

December 1, 2010

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Mr. John Rowse
Executive Director
BC Onsite Sewage Association
Box 101 6450 Island Hwy
Nanaimo BC V9T 1X2

Dear Mr. Rowse:

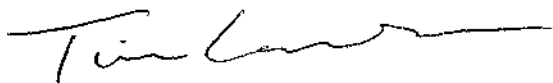
Thank you for your letter, dated November 5, 2010, expressing concerns regarding section 3.1(2) of the *Sewerage System Regulation*, which stipulates minimum setback distances of both septic and holding tanks from drinking water wells.

As you know, groundwater protection is a valued goal in British Columbia as it serves both a source of drinking water and a resource for our economy. The setback distances in the current *Sewerage System Regulation* were developed with those goals in mind among other considerations such as British Columbia's unique geology, potential cumulative effects, alignment with drinking water well requirements under the *Public Health Act*, the need for flexibility for landowners and risk management principles. Other jurisdictions with similar provisions were also considered. Our approach strikes a balance between public health protection and flexible options allowing modifications based on site-specific circumstances.

I appreciate your information on minimum setback provisions drawn from the draft Canadian Standards Association document and note another important excerpt in the draft that "Local regulations might require larger setback distances and should be consulted". We support this approach because a national standard may not reasonably capture conditions unique to various provinces, especially those specific to British Columbia. Consequently, it appears there is no conflict between BC's requirements and the current draft of the CSA minimum setback standard.

I'd be happy to review any scientific rationale you may have to support alternative BC setback distances for consideration in future amendments of the *Sewerage System Regulation*.

Yours truly,



Tim Lambert
Executive Director
Health Protection