



MANITOBA ASSOCIATION OF COTTAGE OWNERS Inc.

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RE: PROPOSED AMENDMENTS TO OWMS REGULATIONS (MR 83/2003)

The Manitoba Association of Cottage Owners Inc. (MACO) are pleased to have the opportunity to provide input regarding the amendments proposed to our OWMS regulations. We hope that our opinions will be respected and reflected in change.

The first thing to notice is the picture of restrictions affecting the Red River region between Selkirk and Winnipeg. This is long overdue, and a welcome change. We hope that the restricted area will also mean that no repairs will be allowed. That is not clear in the document. If this is not the case, it would appear to be an ineffective move when it comes to solving any problems. Stopping new does not fix old problems. A problem definitely exists and needs addressing. Clear plans to deal with problems on existing lands are omitted and will cause problems between neighbors. The old systems will have to be addressed right away. They should all be listed and operated under permit until they are dealt with.

This restricted area seems to fall short of a more environmentally sensitive region near the Netley Creek area, and we are not sure why you stopped where you did with the proposal. The wider, stiller Red River and Netley Creek would seem to be popular

habitat for animal and aquatic life, and at risk from sewage runoff. We see a great start, with the hope that this region will expand North in the near future.

Septic systems should only be allowed by exception. Property owners should have to prove a need for these systems. It is not very common that a residence cannot be serviced by a waste removal service and effluent taken to a lagoon that receives proper treatment. At present there is this feeling that people have a right to install septic systems. MACO see the need to end septic systems except where there is no ability to service a holding tank, or no public sewer system within a reasonable distance to connect with. All that must be in conjunction with acceptable methods as determined by the percolation methods in the existing regulations.

Septic systems should require a larger area than 2 acres. We need this to be 3 or 4 acres. Without that, it is too likely that this could affect neighbors and be in an area with too much density for these fields to remain effective. There should also be automatic caviats so that no land with a septic system can be subdivided unless it retains an area suitable for the septic system to the satisfaction of Conservation. Many cottage areas and backlots near them are up to 2 acres in size. We need to eliminate the concerns that septic systems are being installed where a cottage area may not be identified by Conservation.

There should be no septic systems in cottage country. There should be no septic systems within an area that drains directly into a waterway. There are many septic systems within 300 m of Lake Winnipeg, and nothing is being done about them. This is true along the Winnipeg River also. These properties are showing signs of direct drainage by the growth patterns on the lakefront. They are not legal systems and never were. They are not serviceable or inspectable. They do not meet proper clearances of any regulation in the past even. They cannot be proven to be working so they should be required to be replaced and compliant. Allowing an old problem to fester is not doing the environment any good. This is a common cause of problems in cottage country, and we are not seeing action to deal with this.

Manitoba does not have the geological makeup to allow septic systems along waterways. There is either rock or clay under the soil and not very far down. This is causing direct runoff at a lower level, and is polluting the shallow wells in cottage country. Grandfathering has to be a thing of the past. That is just not acceptable. Grandfathering is a way for the Province and the Municipalities to ignore the problems created by decades of ignoring inspection and permit requirements.

Regulations requiring inspection of septic systems are still missing. There are international regulation standards being used in the USA that require annual inspections of septic systems to prove they are working properly. If the owner does not provide this inspection report annually, they could lose their occupancy permit. These could be simply adopted here. If you are affecting the environment, you should prove you are being responsible and maintaining a system.

People who own septic systems rarely understand how they work and how to maintain them. They need pumping regularly to remove solids. They should have some treatment to ensure that they are getting the bacteria they need to operate. They should not have kitchen sinks and food product put into them. They should not have chlorine and harsh chemicals used for cleaning toilets and dishes put down them. They concentrate all that

chemical and kill all the effective bacteria in a system. This effectively shuts down the system. That will guarantee trouble prematurely. All this comes down to a holding tank doing a much better job for less trouble and less risk and less money in the long run.

Ejector elimination is a good thing. I am not sure how many of these systems there are, but surface disposal is never a good thing with untreated sewage.

MACO are still at a loss over pit privies. Why are they necessary? Why are they still allowed? You want to restrict septic systems, but allow people to use pit privies. That is absurd. Vault privies I understand, but pit privies are no longer an acceptable thing. This practise has been a concern for us many years prior to the first version of the OWMS Regulations. If they are to remain tolerated in the regulations, they should be by exception, not the rule. They should have to demonstrate the need, and only for temporary purposes, not long term. They should be eliminated throughout cottage country as well. There is no need to have these things flooding every spring spreading stuff who knows where. Pit privies must be ended.

SUMMARY

- End septic systems except:
 - where they can be successfully installed with percolation testing
 - periodic submission (1 or 2 yrs max.) of inspections to ensure operation with penalties for failure to do so
 - where there is no service to pump out a holding tank
 - where there is no municipal service within a reasonable distance
 - where geotechnical surveys show the land is capable of handling the effluent
 - where they are not going to affect a waterway or within 300 m
 - where there is 4 acres or more land
 - where they are not in a subdivision or cottage development
- End the pit privy. They are a dinosaur and no longer necessary. Vault privies only
- Extend the restrictions to the North of Selkirk. Full time residents only (not seasonal or weekend) to be given special consideration with the expectation of upgrading when repairs are required
- Eliminate all septic systems and pit privies from cottage country. All cottage areas should be contained and serviceable. If they are particularly remote, then they must go back to the septic system recommendations we made
- All septic systems should be on a permit system and inventoried
- There are not enough inspectors to deal with all the problems, and they are the responsibility of the landowner, not Conservation. We need to put more responsibility on the land owner
- Landowners should have to prove things are working and correctly installed regardless of age or system type when a complaint is made just like any other appliance like a wood stove. Then there is documentation to eliminate confusion or misunderstandings for clear rulings.
- Grandfathering must end. The only way to reduce the problem is eliminating the old ones that are doing the most damage

MACO hope that the amendments take place with the recommendations we have provided. In general all the changes are a step forward and worthy of being made regulation with some improvements. We also look forward to improved enforcement with the new officers being touted in the news.

Thank you for offering us a chance to provide input on the proposal. Please keep us informed where you can. We would be happy to consider other environmental changes and regulations in future. It is important that we maintain open communication between our offices.

Sincerely,

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