

Ontario

Ministry of the Environment

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TO	INITIALS	DATE
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 RECEIVED SEP 21 1976  
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 Toronto Ontario  
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September 14, 1976

*cc letter to G. Borgey  
 a Joe E. Lee  
 action*

Mr. K. Shikaze,  
 Chief, Environmental Control Division,  
 Environmental Protection Service,  
 Ontario Region, Environment Canada,  
 135 St. Clair Avenue West,  
 Toronto, Ontario

Dear Kim:

Re: PLUARG Task A Legislative Study Interim Report No. 2

I found the Legislative Study Interim Report No. 2 on Provincial and Local Controls thorough and crisp. I have marked suggested editorial changes in pencil throughout the text. In addition, I have specific comments on several portions of the report which are listed below by section:

I. Overview  
 para. 1

I suggest rewording the last sentence to specify also the types of pesticides for which farmers do not require permits or licences. The information in the second sentence of Reference 70 might be suitable. The present wording implies a hazard for the exempted pesticides, although this is not recognized by the legislation as such.

II.2 The Ontario Water Resources Act  
 para. 5, under 'Comment'

The portion of the paragraph beginning 'In the absence of such requirements ... ..' should be deleted, as the purpose of the report is to deal with what the Government does, not how it needs to explain its actions.

para. 7 & 10, under 'Comment'

Although I agree with Mr. Castrilli's record that we used the terminology technically and politically feasible, I would prefer to see the terminology technically and socially feasible, as I believe the Ministry staff are not in a position to make political judgments.

/cont'd.

II.2 para. 7, under 'Comment'  
last sentence

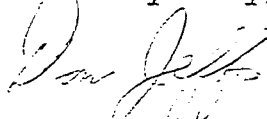
The intent of the Thames River Study recommendation referred to was for selective surveillance and enforcement based on data concerning the location of large livestock operations. In this regard, and contrary to footnote 39, a valuable reference is the 1974 unpublished report by Agriculture Canada, entitled: "A Selective Inventory of Large Livestock Operations in Southern Ontario". This report, and the associated computerized information, contains a variety of valuable information, including a detailed breakdown of the location, size, and type of feedlot operations in Southern Ontario.

V.2 Agricultural Code of Practice  
last para., under 'Comment'

I suggest deleting the words 'if not more so', and the reference, as documents are prepared in draft form for the purpose of obtaining modifications and it does not seem suitable to reference them.

I believe it would be desirable to send the draft report or pertinent sections of it to those people to which comments are attributed. Additionally, I suggest that it be sent to Messrs. N. Mulvaney, R. Frank, E. Brubaker, E. Turner, V. Morley and R. Code.

Yours very truly,



Donald Jeffs,  
PLUARG Task C Co-Chairman

DNU/fc

cc: V. Morley  
P. Dennis  
G. M. Wood