

Township of Oro-Medonte Drinking Water Quality Management System

OPERATIONAL PLAN

Applicable to the following Drinking Water Systems:

(Braestone, Canterbury, Cedarbrook, Craighurst, Harbourwood, Horseshoe Highlands, Maplewood, Medonte Hills, Robincrest, Shanty Bay, Sugarbush and Warminster)

VERSION #: 16-2024 Endorsed: June 27, 2024





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Director's Directions for Operational Plans - Subject System Description Form

		Municipal Resident	ial D	rinking Water System				
Owner of Municipal Residential Drinking Water System:		The	The Corporation of the Township of Oro-Medonte					
Subject Systems								
Name of Drinking Water System	Licence Number	Name of Operational Subsystems (if Applicable)	Name of Operating Authority		DWS Number(s)			
Braestone	126-112	n/a	The Corp. of the Township of Oro-Medonte			260095498		
Canterbury	126-106	n/a	The Corp. of the Township of Oro-Medonte			220007454		
Cedarbrook	126-108	n/a	The Corp. of the Township of Oro-Medonte		220006936			
Craighurst	126-109	n/a	The Corp. of the Township of Oro-Medonte		250001322			
Harbourwood	126-110	n/a	The Corp. of the Township of Oro-Medonte			220006703		
Horseshoe Highlands	126-101	n/a	The Corp. of the Township of Oro-Medonte		250001402			
Maplewood	126-104	n/a	The Corp. of the Township of Oro-Medonte		220004135			
Medonte Hills	126-111	n/a	The Corp. of the Township of Oro-Medonte		Medonte	220003920		
Robincrest	126-107	n/a	The Corp. of the Township of Oro-Medonte		Medonte	220010752		
Shanty Bay	126-105	n/a	The Corp. of the Township of Oro-Medonte		220005198			
Sugarbush	126-102	n/a	The Corp. of the Township of Oro-Medonte		220001518			
Warminster	126-103	n/a	n/a The Corp. of the Township of Oro-Medonte 220005125			220005125		
Add attachments if there are additional Drinking Water Systems or Operational Subsystems								
Contact Information for Questions Regarding the Operational Plan								
Name Title		Title	Phone No(s).		Email Address			
Primary: Michelle Jakobi	Dire	Director of Environmental Service		705.487.2171 x2503	mjakobi@oro-medonte.ca			
Alternate: Jennifer Barrick	En	Environmental Systems Manager		705.487.2171 x2501	jbarrick@oro-medonte.ca			

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Introduction

Justice Dennis O'Connor, in Part Two of the Report of the Walkerton Inquiry, recommended the adoption of quality management for municipal drinking water systems. It was also recommended that a quality management standard specifically designed for drinking water systems be developed and implemented in Ontario, thus leading to the creation of the Drinking Water Quality Management Standard (DWQMS).

Ministry of Environment, Conservation and Parks (MECP) requires Owners of municipal drinking water systems to obtain a licence for the operation of the drinking water system. To obtain a licence, the Owner must have the following components:

- Drinking Water Works Permit A permit to establish or alter a drinking water system.
- 2. Permit to Take Water A permit to authorize the withdrawal of water for each source in accordance with the Ontario Water Resources Act (OWRA).
- Operational Plan Written documentation of the Operating Authority's Quality Management (QMS) that satisfies the requirements of the DWQMS as approved by the MECP.
- 4. Accreditation Accreditation is issued based on a fulsome audit of the Operating Authority's QMS by a third-party organization designated as an accreditation body in accordance with Section 22 of the Safe Drinking Water Act (as amended).
- Financial Plan A financial plan meeting all requirements of O.Reg 453/07: Financial Plans under the Safe Drinking Water Act (as amended) indicating that the drinking water system(s) are financially viable is created and approved by Council resolution.

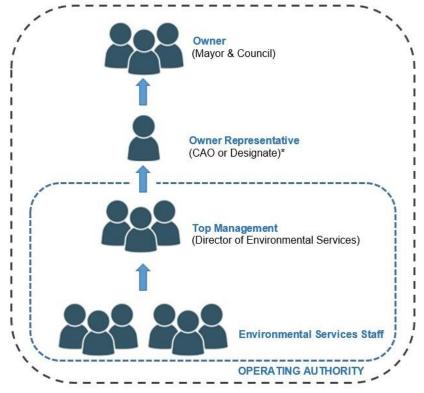
Element 1: Quality Management System

The Municipal Drinking Water Licensing Program, pursuant to the Safe Drinking Water Act (SDWA) and its Drinking Water Quality Management Standard (DWQMS), requires the Operating Authority to establish a Quality Management System (QMS).

The QMS is a formalized system for achieving policies and objectives to support the production and delivery of safe drinking water, which is documented in this Operational Plan (Plan) as part of efforts to ensure that safe and reliable drinking water is supplied to all customers serviced by the Township of Oro-Medonte drinking water systems.

Township of Oro-Medonte Environmental Services (ES) department, designated through Council Motion No. CW090318-11 as the 'Operating Authority', is responsible for the operation and maintenance of the drinking water systems, the QMS and the Operational Plan. The QMS Structure is illustrated in Figure 1 on the subsequent page.

Figure 1 – QMS Structure



* Council Motion #CW090318-11

Environmental Services has developed an integrated Operational Plan to display the Operating Authority's ability to meet the requirements of the MECP's *Drinking Water Quality Management Standard, Version 2.0 (as amended),* approved under the Safe Drinking Water Act (as amended). The Plan contains documentation to support each of the twenty-one (21) required DWQMS elements, with a proactive and preventive approach to assured drinking water quality. It provides an understanding of the drinking water systems; the roles and responsibilities of the Owner and Operating Authority; and fundamentals for long-term sustainability. For efficiency and clarity, common elements of QMS are outlined in this document with procedural documents and requirements specific to individual systems referenced.

The Operational Plan is available in two formats: one in electronic format, which acts as a controlled document and contains the most up-to-date information; and the second, a printed copy, which is printed annually for re-accreditation purposes. For public viewing, the Operational Plan is available on the municipal website (www.oro-medonte.ca) or upon request at the Township Administration Office.

The continual improvement and annual review to maintain the currency of this Plan will help ensure that all regulatory requirements are consistently met and that consumers can be confident that their drinking water is protected through the effective application of the QMS.

Element 2: Quality Management System Policy

The Quality Management System Policy is a requirement of the DWQMS and acts as the driver for the QMS, documenting commitments to assure that quality management is important in the management and operation of the drinking water systems.

The Township of Oro-Medonte is committed to managing the treatment and supply of clean, safe drinking water to all of its customers and commits to meet consistently, all applicable legislative and regulatory requirements along with customer needs. This commitment is defined and documented in the Quality Management System Policy and resonates throughout the Plan.

The Township of Oro-Medonte has established and maintains a Quality Management System Policy that is; regularly reviewed, maintained, and continually improved upon by management and staff involved in the supply of safe drinking water. The Quality Management System Policy is readily available, in hard copy, at the Township Administration Office and available to the public on the Township of Oro-Medonte website (www.oro-medonte.ca).

Element 3: Commitment and Endorsement

The Owner and Top Management of the Operating Authority (as defined in Element 9 – Organizational Structure, Roles, Responsibilities and Authorities) demonstrate their ongoing responsibilities and commitment to an effective QMS by ensuring the following:

- A QMS has been created and maintained that meets the DWQMS requirements.
- The Operating Authority (Environmental Services) is aware of all applicable legislative and regulatory requirements.
- Communication of the QMS with all applicable stakeholders is performed in accordance with details summarized in the system procedure for Element 12: Communications.
- Resources needed for the maintenance and continual improvement of the QMS have been determined, obtained and provided.

These commitments are substantiated through the written endorsement included in this Plan on the subsequent page.



COMMITMENT AND ENDORSEMENT

The Owner (The Corporation of the Township of Oro-Medonte as represented by the Chief Administrative Officer (CAO) and elected Council) endorses this Operational Plan and demonstrates commitment in support of the implementation, maintenance and continual improvement of an effective Quality Management System (QMS). The Owner has designated an Owner Representative (Owner Rep) through a motion of Council to assume the roles and responsibilities as they relate to the QMS while ensuring its continued performance and requirements are communicated to the Owner, in accordance with the Operational Plan.

The Owner, (represented by the CAO (or designate)) and Top Management of the Operating Authority (represented by the Director, Environmental Services or (designate)) are committed to the implementation, maintenance and continual improvement of a QMS that meets the requirements of the Drinking Water Quality Management Standard (DWQMS). The QMS for the municipally-owned drinking water systems is documented in this Operational Plan. Top Management's endorsement of the Operational Plan and the QMS is provided through the signatures below.

Chief Administrative Officer (or designate)

Director Environmental Services (or designate)

June 27, 2024

June 27, 2024

Element 4: Quality Management System Representative

The DWQMS requires Top Management to appoint and authorize a Quality Management System Representative (QMS Rep). The Appointment of QMS Representative document outlines the authority, roles and responsibilities belonging to the role of QMS Rep, which has been signed by Top Management and is attached.

In the event of a prolonged absence of the QMS Representative, Top Management will appoint an alternate.

This appointment is documented through the written endorsement included in this Plan on the subsequent page.

Oro Nedonte Proud Heritage, Exciting Future

APPOINTMENT OF QMS REPRESENTATIVE

Top Management of the Operating Authority (Environmental Services) for the Corporation of the Township of Oro-Medonte has appointed the role of Quality Management System Representative (QMS Rep) to the position of Environmental Services Technologist.

The QMS Rep acts as the liaison between Top Management and Environmental Services. The QMS Rep, irrespective of other responsibilities, shall:

- 1. Administer the QMS by ensuring that processes and procedures required are established and maintained,
- 2. Report to Top Management on the performance of the QMS and any need for improvement,
- 3. Ensure that current versions of documents required by the QMS are being used at all times.
- 4. Ensure that personnel are aware of all applicable legislative and regulatory requirements that pertain to their duties for the operation of the Township of Oro-Medonte's drinking water systems, and
- 5. Promote awareness of the QMS throughout the Operating Authority.

Director, Environmental Services (or designate)

June 27, 2024 Date

Element 5: Document and Record Control

The Document and Record Control procedure is located in the Policies and Procedures Manual. This procedure describes how documents and records required by the QMS are:

- Kept current, legible and readily identifiable;
- Retrievable:
- Stored, protected, retained and disposed of in accordance with legislative retention requirements (if applicable).

Element 6: Drinking Water Systems

Detailed descriptions of the drinking water systems owned and operated by the Township of Oro-Medonte are outlined in the following documents, located in the Operations Manual and Policies and Procedures Manual:

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Drinking Water System Description – Braestone
Drinking Water System Description – Canterbury
Drinking Water System Description – Cedarbrook
Drinking Water System Description – Craighurst
Drinking Water System Description – Harbourwood
Drinking Water System Description – Horseshoe Highlands
Drinking Water System Description – Maplewood
Drinking Water System Description – Medonte Hills
Drinking Water System Description – Robincrest
Drinking Water System Description – Shanty Bay
Drinking Water System Description – Sugarbush
Drinking Water System Description – Warminster
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These procedures describe the Township of Oro-Medonte's drinking water systems; including treatment processes and distribution components, a process flow chart and descriptions of any upstream or downstream processes relied upon to ensure the provision of safe drinking water.

Alterations made to the drinking water systems are completed in accordance with the conditions found within the Municipal Drinking Water Licence (MDWL) and/or Drinking Water Works Permit (DWWP) (as amended).

Element 7: Risk Assessment

The Risk Assessment procedure is located in the Policies and Procedures Manual. The Risk Assessment procedure is a systematic methodology that identifies, assesses and ranks potential hazards and events, monitors limits and actions taken to prevent, mitigate, or respond to hazards, and considers the reliability and redundancy of equipment. Also, it defines Critical Control Limits and Critical Control Points where required. Risk

Assessments for each subject system are documented in the Risk Assessment Tables located in the Policies and Procedures Manual.

At least once every calendar year, the QMS Rep and Environmental Services Staff review the risk assessment and ensure information and assumptions remain current and valid.

At a minimum, the QMS Rep will assemble the Environmental Services Staff to ensure that the risks are assessed at least once every thirty-six months.

Element 8: Risk Assessment Outcomes

The outcomes from the risk assessment process are documented in the Risk Assessment Tables.

The document summarizes outcomes, Critical Control Points and Limits, and control measures determined through the risk assessment process. This document also describes the procedures for recording Critical Control Limit deviations.

Element 9: Organizational Structure, Roles, Responsibilities and Authorities

Key roles in the management of drinking water quality for the Township of Oro-Medonte are defined in the attached Organizational Structure.

Responsibilities and authorities for positions directly affecting drinking water quality for the Township of Oro-Medonte are defined in the Safe Drinking Water Act, 2002 (as amended), through Environmental Services job descriptions that are located in the Policies and Procedures Manual and are further communicated through on-the-job training. Job descriptions can be found on the appropriate corporate network drive. Owner/Owner Representative and Top Management roles and responsibilities are defined below:

Owner/Owner's Representative – Responsibilities and Authorities:

The Township of Oro-Medonte, represented by an elected Mayor and Municipal Council, is responsible for ensuring the delivery of a safe and reliable supply of drinking water to the residents of municipal drinking water systems within the Township of Oro-Medonte. The Mayor and Members of Council, as Owners, have the authority to delegate the management of the drinking water system to qualified staff. Council has appointed the Chief Administrative Officer as the Owner's Representative.

Additionally, the Owner assumes the applicable responsibilities and authorities outlined in the Safe Drinking Water Act, 2002 (as amended) and the DWQMS, which include:

Ensuring the Operating Authority is accredited;

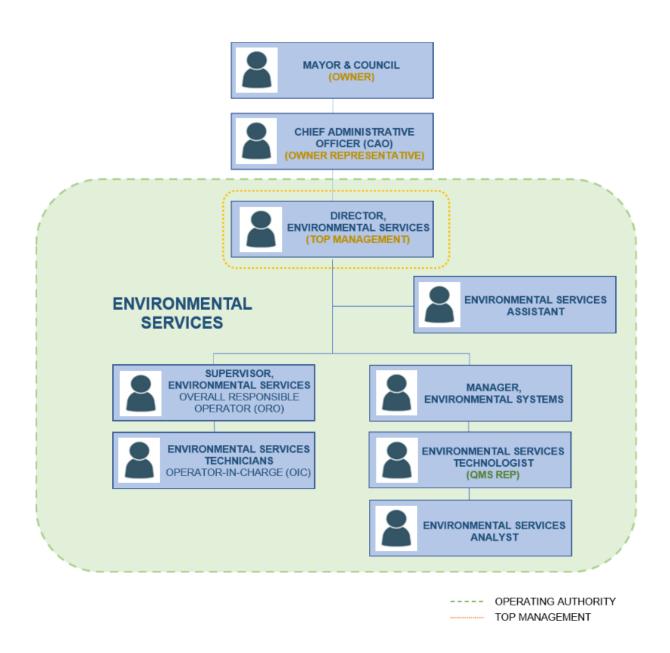
- Endorsing and submitting the Operational Plan to the Ministry of the Environment, Conservation and Parks (MECP);
- Developing and submitting Financial Plans to the Ministry of Municipal Affairs and Housing.

Director of Environmental Services - Responsibilities and Authorities:

- The Director is responsible for arranging reports to the Mayor and Members of Council on the oversight of the municipal drinking water systems.
- The Director is responsible for providing resources/infrastructure, long-term planning and budgeting;
- The Director ensures the DWQMS is implemented and communicated to Council;
- The Director is authorized by Council to ensure that management staff is in place to ensure the drinking water systems are supplying safe and reliable drinking water, in accordance with all applicable legislation and regulations.
- The Director has the authority to ensure staff is in place to manage the water supply system, appoint a QMS Representative, develop administrative and technical policy, and evaluate and prioritize long-term utility needs;
- Execute documents for the Municipal Drinking Water Licence, Drinking Water Works Permit, Permit to Take Water, and all associated documentation (as per Council Report ES2022-07: Delegated Authority for Environmental Services);



ORGANIZATIONAL STRUCTURE



Element 10: Competencies

Competencies required by personnel whose duties directly affect drinking water quality for the Township of Oro-Medonte are defined in Environmental Services job descriptions, located in the Policies and Procedures Manual. Owner/Owner Representative and Top Management competencies are defined below:

Chief Administrative Officer (CAO) – Competencies:

 The CAO is briefed on operating conditions and is provided updates required by regulations at regular meetings with the appropriate personnel. These activities provide the CAO with the awareness and competency to perform his/her duties.

Director of Environmental Services – Competencies:

- Shall possess advanced theoretical and working knowledge of administrative skills expected of senior level management;
- Shall possess an intermediate theoretical and working knowledge of the Safe Drinking Water Act, 2002 (as amended) and applicable regulations, and the Township of Oro-Medonte Water Supply Systems;
- Shall possess a basic understanding of the Drinking Water Quality Management System.

The competency requirements, as outlined above and in the Environmental Services job descriptions, are ensured through the following activities:

- All new employees must provide evidence of MECP certification and other competency requirements. All drinking water operator certificates are filed in their training file at the Administration Building and on the appropriate corporate network drive;
- All new employees undergo training under the QMS Representative, including a review of the Operational Plan, the Policies and Procedures Manual, and on-thejob instruction;
- Employees are trained annually. Annual training ensures that employees are aware of the relevance of their duties and how their roles affect the safety of drinking water.

Actions taken to verify competence may include; observing job performance, appropriate on-the-job training documentation, internal audit results, corrective actions issued and annual job performance evaluations.

Documented evidence of these requirements are maintained in Human Resources personnel files and Environmental Services training files. Personnel files include training.

education, skills, experience and performance reviews. These records are maintained for all permanent employees.

Element 11: Personnel Coverage

The Personnel Coverage system procedure, located in the Policies and Procedures Manual, describes how adequate staffing and personnel coverage are ensured and maintained within the Operating Authority. The procedure details personnel coverage measures followed during regular business hours, as well as during evenings, weekends, holidays, during emergencies, pandemics, and union strike situations.

Element 12: Communications

The following activities describe how the relevant aspects of the QMS are communicated between the Owner/Owner Rep, Top Management, Operating Authority, suppliers, internal/external stakeholders, and the public:

- The Director of Environmental Services ensures that the Owner (Mayor and Council) is provided with a current copy of the Operational Plan;
- The Director of Environmental Services keeps the Owner informed of any changes to the QMS, the adequacy of infrastructure requirements, the outcome of ongoing activities as a result of Management Review and other QMS issues;
- The Operational Plan is circulated and reviewed by all Environmental Services employees and meetings are recorded on the 'On-the-Job' Training Form;
- Procedures are circulated and reviewed by all Environmental Services employees through on-site training meetings and documented in the staff training files and Environmental Services training database;
- New Environmental Services staff is required to be given a copy of the QMS to review and to sign the 'On-the-Job' Training Form;
- Copies of the currently approved QMS for all staff are kept in the Environmental Services main office. Personnel are informed of the QMS, and any changes or updates to it, through informal meetings and feedback between the QMS Representative and Environmental Services Technicians;
- Water System Work Order/Complaint Forms are reviewed and approved by the appropriate personnel. These forms are reviewed annually for trends and opportunities for improvement as part of the requirements of Elements 14 and 15 of the DWQMS;
- Essential suppliers receive information regarding the QMS for the Township of Oro-Medonte, if and when necessary, as described in the Essential Supplies and Services procedure;
- Copies of the QMS are publicly available at the Township Office, 148 Line 7 South, and on the Township website at www.oro-medonte.ca.

- Consumers are also notified through social media of the availability of the Drinking Water Compliance Reports, as required by Ministry regulations, and of the DWQMS Operational Plan at the Township Office and on the Township website;
- Any consumer comments or concerns with respect to the QMS are forwarded to Top Management through the QMS Representative, who responds to the consumer.

Element 13: Essential Supplies and Services

The Essential Supplies and Services procedure, located in the Policies and Procedures Manual, identifies the supplies and services deemed essential to the delivery of safe drinking water and describes how the quality of these essential supplies and services is met continually. The list of essential suppliers is reviewed annually during the Internal Audit.

Element 14: Review and Provision of Infrastructure

The Director of Environmental Services, on an ongoing basis, assesses the immediate status and adequacy of the Township of Oro-Medonte's drinking water infrastructure. Resource requirements for maintaining adequacy are determined and communicated annually through the budget process.

The Review and Provision of Infrastructure procedure, located in the Policies and Procedures Manual, documents the process followed by the Township of Oro-Medonte for the annual review of the adequacy of its drinking water system infrastructure.

Inputs for Infrastructure Review can include, but are not limited to:

- The current Capital Plan
- Results from previous infrastructure reviews
- Corrective and preventative maintenance histories
- Customer complaint reviews
- Life Cycle Cost Analysis
- Information regarding water quality initiatives and regulations
- Water quality data, and
- Any other relevant information

Outputs of the Infrastructure Review can include, but are not limited to:

Documented Capital Plan

Element 15: Infrastructure Maintenance, Rehabilitation and Renewal

The Infrastructure Maintenance, Rehabilitation and Renewal procedure that is located in the Policies and Procedures Manual, describes how the Township of Oro-Medonte carries out maintenance and infrastructure renewal programs related to the drinking water infrastructure. Infrastructure maintenance is addressed through both, planned (preventative) and unplanned (corrective) maintenance.

Planned (Preventative) Maintenance:

Preventative maintenance is a schedule of planned maintenance activities to prevent breakdowns and failures. Preventing equipment failure before it occurs ensures a safe and reliable supply of drinking water.

Maintenance activities are described in procedures specific to the equipment being maintained. Scheduled maintenance activities and frequencies are developed from the manufacturer's recommendations, operator experience/observations, and general accepted industry standards and best practices. Planned maintenance tasks are communicated to the person responsible for the issuance of the Water System Work Order/Complaint Form. Completed forms are reviewed and signed by the appropriate personnel. Completed and signed Water System Work Order/Complaint Forms are filed in accordance with the Document and Records Control procedure found within the Policies and Procedures Manual.

<u>Unplanned (Corrective) Maintenance:</u>

Unplanned maintenance tasks result from equipment malfunction, breakage and/or customer complaints. The Operator-in-Charge (OIC) responds to unplanned maintenance, as required. Results of unplanned maintenance are documented on the Water System Work Order/Complaint Form. Completed and signed Water System Work Order/Complaint Forms are filed in accordance with the Document and Records Control procedure found within the Policies and Procedures Manual.

Annual Maintenance Review:

At a minimum, once every calendar year, the Director of Environmental Services prepares a summary of the infrastructure maintenance, rehabilitation and renewal program, which specifically looks at unplanned maintenance work to determine if additional planned maintenance or replacement is required. This data may be used as input to the annual Review and Provision of Infrastructure program and Management Review. This summary is also communicated to Owner/Owner Representative during the annual Management Review meeting and during Budget review.

Element 16: Sampling, Testing and Monitoring

The Sampling, Testing and Monitoring system procedure, located in the Policies and Procedures Manual, describes how the Township of Oro-Medonte performs water sampling, testing, and monitoring to ensure the production and distribution of safe drinking water. This document includes requirements for sampling and monitoring the conditions most challenging to the subject system.

A description of how results are communicated throughout the organization is also provided in this document.

Sampling, testing and monitoring requirements are identified and incorporated into system-specific sampling plans and a sampling schedule that are based on the requirements set out by the MECP. These documents are reviewed and updated as necessary, to incorporate regulatory and/or operational sampling, testing and monitoring requirements. Incidents of regulatory non-compliance and adverse drinking water tests, deviations from critical control point limits and response actions, and water quality tests are discussed during Management Review.

All groundwater systems are non-GUDI wells and as such, require no upstream sampling.

Element 17: Measurement & Recording Equipment Calibration & Maintenance

The Measurement and Recording Equipment Calibration and Maintenance procedure, located in the Policies and Procedures Manual, describes the requirements for the calibration and verification of measurement and recording equipment used for monitoring raw and potable drinking water through treatment, storage, pumping and distribution systems owned by the Township of Oro-Medonte.

This procedure lists the equipment governed under this program. For each type of measurement and recording equipment, the procedure provides information, including maintenance/calibration frequency and methods, a listing of who is responsible for the maintenance of equipment (internal or outsourced), and related record-keeping requirements.

Element 18: Emergency Management

Potential emergencies that have been identified in the Contingency Plan are located in each of the pumphouses.

Emergency management incidents are reported on the Corrective Action Report form. The Continual Improvement procedure describes how this form is used. Both the system procedure and the form are located in the Policies and Procedures Manual.

Environmental Services is required to review the written Policies and Procedures Manual, Operations Manual and Contingency Plan, annually. When practical, emergency

procedures are tested on an annual basis. Records of these reviews are recorded in the Environmental Services Training Database.

Emergency communication protocol and operating authority responsibilities have been included in the response procedures for each potential emergency, as found in the Contingency Plan and Policies and Procedures Manual.

The emergency contact information is located in each pumphouse on the Environmental Services Emergency Contact List, the Contingency Plan, and the Essential Supplies and Services procedure.

Owner/Owner Rep responsibilities during emergencies are defined in the Township's internal Emergency Operation Centre program.

Element 19: Internal Audit

Internal audits are conducted to ensure that the QMS conforms to the requirements of the Township of Oro-Medonte Operational Plan and meets or exceeds the requirements of the MECP's Drinking Water Quality Management Standard (DWQMS).

The Internal Audits procedure, located in the Policies and Procedures Manual, describes how the Township of Oro-Medonte:

- Evaluates conformity of the QMS with the requirements of the DWQMS;
- Identifies internal audit criteria, frequency, scope, methodology and recordkeeping requirements;
- Considers previous internal and external audit results; and,
- Describes how Quality Management System corrective actions are identified and initiated.

Non-conformances are reported on the Corrective Action Report form. The Continual Improvement procedure describes how this form is used. Both the system procedure and the form are located in the Policies and Procedures Manual.

Element 20: Management Review

The Management Review system procedure that is located in the Policies and Procedures Manual, describes the process followed by Top Management in planning, executing, and documenting DWQMS Management Reviews. The Management Review process ensures that all levels of the organizational structure are kept informed and aware of DWQMS and DWS performance.

The QMS Rep coordinates and facilitates the Management Review meetings and the compilation of required input data for presentation to the Owner/Owner Rep and Top Management. Required inputs to Management Review are defined by the DWQMS and

are listed in the Management Review procedure. Owner/Owner Rep and Top Management are responsible for reviewing the input materials presented and generating outputs as specified in the Management Review procedure.

Management Review meetings are conducted at least once every calendar year. However, multiple Management Review meetings can be held within a year, if required, as long as all defined review requirements are addressed annually.

Management Review outputs are documented on the Management Review Record Form and retained as documented evidence of the review. The Management Review Record documents topics discussed, as well as action items, and can also serve as meeting minutes.

Negative trends in data and opportunities requiring investigation are explored further through our continual improvement process. The Continual Improvement procedure describes the process and how it is documented. Both the system procedure and the associated forms are located in the Policies and Procedures Manual.

The Owner Representative is responsible for communicating Management Review results to the Owner, as defined in the Management Review procedure located in the Policies and Procedures Manual.

Element 21: Continual Improvement

The Township of Oro-Medonte undertakes continual improvement initiatives to prevent or reduce non-compliant and non-conformance events by addressing their root causes. These initiatives also document potential non-conformities as opportunities for improvement, which can be identified when new methods or efficiencies are found to optimize resources. This is achieved through, but not limited to, the application of the Quality Policy, Operational Plan, Audit Outcomes, data analysis, Corrective and Preventative Measures, Work Order/Complaint Data Trends, and the Management Review Process.

The Continual Improvement system procedure, located in the Policies and Procedures Manual, describes the process and how the associated forms are used to track and measure continual improvement of its Quality Management System (QMS)Continual improvement initiatives or opportunities for improvement may result from the following, but not limited to:

- Ministry of the Environment, Conservation and Parks (MECP) best management practices (when published, at least once every 36 months)
- MECP Regulatory Inspections
- Internal and External Audit Results
- Meetings (Corporate, Departmental, and/or Management)
- Management Review
- Customer Complaints and Feedback

- Operational Trends and Challenges
- Best Management Guidance and Practices

The continual improvement process serves as a method for collecting data. This data, along with the Management Review Record, assists in identifying opportunities for efficiencies, continual improvement and non-conformities in the DWQMS while implementing changes necessary to ensure and maintain the continued suitability and effectiveness of the DWQMS.