



BC Onsite Sewage Association

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Mr. Tim Lambert
Executive Director, Health Protection
4th Floor - 1515 Blanshard St
Victoria BC V8W 3C8

September 30, 2010

Dear Mr. Lambert

Re: Sewerage System Regulation Processes

A significant number of issues were raised at the Registered Onsite Wastewater Practitioner Meeting in Prince George September 14th 2010 regarding the administration of the Sewerage System regulation at all levels. At your invitation, we are writing to you regarding issues that BCOSSA will be able to assist the ministry and industry with.

Central Filing Program:

The BC Onsite Sewage Association has developed and implemented a central filing process known as BCFiling.ca which is currently being used through Vancouver Island Health Authority's lower island jurisdiction. BCFiling.ca is a web based process that allows authorized persons to submit filings to the health authority from the comfort of their home or office. The system provides the AP with the ability to submit filings at any time of the day or week without traveling to a health authority office, saving time and money. The system also provides the AP with a permanent record, storage and tracking for all their filings and letters of certification.

For the health authority the system provides secure electronic record management, saving time and resources. The BCFiling.ca system provides the ability to receive and review (if desired) documentation submitted by all APs in their region within one health authority office. The system is compatible with the current Health Space data management tool used by the health authorities. The BCFiling.ca system provides long term permanent storage of filing records and all attachments, significantly reducing storage and staff resources for the onsite industry.

The system is "user pay" and accessible to the health authorities at no cost. Current health authority filing fees are paid directly to the HA through the system.

BCFiling.ca is the first component of a two component system of file management and onsite system management. BCFiling.ca can be integrated into the patent pending onsite system management tool Guardian®, a web based tool designed for the ongoing management of onsite systems. The Guardian® system tracks the ongoing function and maintenance of onsite systems within a community ensuring timely maintenance and proactive management of onsite systems to prevent malfunction.

Illegal Systems

It is well recognized by our association and its membership that the prevention and control of the installation of illegal system is a challenge that requires the cooperation of all parties involved. Fundamental to proper prevention of illegal activities is recognition of the value of the industry at large and its role in preventing water contamination. Industry support will encourage participation in regulatory solutions to illegal activities long before problems occur.

There are a number of critical control points that could be utilized inexpensively and effectively with a coordinated approach for example:

- Point of sale
- Building alteration
- Rural subdivision processes
- Community water supply
- Well drilling
- Public education

The use of these control points within a proper data management process and in cooperation with the industry and local government would substantially increase the effectiveness of the regulation and traditional enforcement.

Insurance

BCOSSA recognizes that compensation protection for consumers and Practitioners is an important issue to the credibility of the industry.

As for industry protection, BCOSSA through actuarial service provided by AON Reed Stenhouse Inc. developed Errors and Omissions, General Liability and Pollution insurance package specifically for Practitioners. BCOSSA invested \$40,000.00 to ensure Practitioners had an affordable protection plan for their business activities.

The insurance outlined above only partially protects the consumer. Processes should be developed to provide consumers with support and resources when necessary if their system malfunction prematurely or through the actions or inactions of an Authorized Person. The process developed could mirror current home warranty programs that provide support and prevent long term hardship while insurance or other provisions are engaged.

Industry Support

Industry support includes technical support, education, communication and advocacy. BCOSSA continues to supply industry support within all these categories to all of its members.

BCOSSA continues to supply technical support through our Technical Review Committee providing guidance with respect to the Sewerage System Standard Practice Manual. Additionally, we supply tool such as the “Dash Board Manual” technical work sheets and standardized contract forms.

BCOSSA has initiated programs through our educational arm, the Westcoast Onsite Wastewater Training Centre, to update curriculum and material to meet entry level student needs and support ongoing training for currently registered Practitioners and Professionals. All of our educational material

meets the current BC Water and Waste Associations "Training Program Outline" developed for the Ministry.

Communication with industry participants during the development of standards, regulations, policies or directives is critical. BCOSSA continues to provide mechanism for communicating with industry participants through the BCOSSA newsletter, e-mail and through the Local Services Groups. We welcome your utilization of our existing programs and any suggestions you may have for improvement.

During the summary of the Prince George meeting Minister Bell suggested that the BC Onsite Sewage Association was well placed to be the advocates for Practitioners through a "College of Practitioners", supporting their interests during government policy initiatives, technical guidelines, disciplinary activities or legal issues. This approach is welcomed by BCOSSA and we will be developing terms of reference for the "college" which we would like your input on.

BC Onsite Sewage Association is dedicated to the ongoing success of the Sewerage System regulation and the industry at large. We would like to work with you to assist you in any issue related to the regulation and its application.

Yours truly,

A handwritten signature in cursive script, appearing to read "John Rowse".

John Rowse
Executive Director
BC Onsite Sewage Association

cc: John Rustad MLA
Pat Bell MLA
Michael Zemanek
John Leech