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APPENDIX C

June 2, 2026

File: 0220-20 2026 Correspondence

Quentin Brisotto
Enforcement Officer
Environment and Climate Change Canada
Environmental Enforcement Directorate
101 – 401 Burrard Street
Vancouver, BC V6C 3R2
Via email: quentin.brisotto@ec.gc.ca

Dear Quentin Brisotto:

**RE: RESPONSE TO WRITTEN WARNING – FILE NO. 8530-2026-04-01-6917
MCLOUGHLIN POINT WASTEWATER TREATMENT PLANT**

The Capital Regional District (CRD) acknowledges receipt of Environment and Climate Change Canada's (ECCC) written warning dated April 29, 2026, and recognizes the outstanding reporting requirements identified therein, including those associated with sections 45.2(3)(f), and 45.2(4) of the *Wastewater Systems Effluent Regulations* (WSER).

The CRD also acknowledges that the matters outlined in the written warning were a matter of discussion between CRD staff and ECCC Wastewater Section between June and November 2025 and were discussed with the Enforcement Branch during a March 12, 2026 meeting. The CRD considered these discussions constructive in clarifying regulatory expectations and informing the actions now underway.

The McLoughlin Point Wastewater Treatment Plant (MPWWTP), which began operations on January 1, 2021, is still considered a relatively new and complex facility. CRD staff continue to refine operational procedures and validate system performance, including those related to maintenance activities that require temporarily bypassing various components of treatment. This work is being undertaken with the objective of ensuring compliance with all requirements from both provincial and federal regulatory agencies.

The CRD acknowledges that a plan to meet requirements of WSER section 45.2(3)(f), including public availability, has not yet been finalized and we are taking steps to address this deficiency.

CRD staff have initiated a structured work program to identify plant components that may necessitate full or partial bypass during maintenance or replacement. The CRD has retained the original MPWWTP engineer of record to undertake a systematic assessment of planned and unplanned bypass scenarios, associated risks, and regulatory considerations; and to develop appropriate mitigation plans to minimize any impact to the marine receiving environment.

This work will culminate in the development of a Maintenance Bypass Risk and Mitigation Assessment Report and an updated Operating Plan, with the intent of satisfying the outstanding

reporting requirement (WSER 45.2(3)(f)), including provision of an implementation schedule and measures to minimize the frequency and duration of future temporary bypass authorizations.

In addition, the CRD is advancing information related to the bypass(es) to the Core Area Liquid Waste Management Committee, a standing committee of the CRD Board, at a meeting scheduled for July 22, 2026. Following this, and receipt by the CRD Board, the CRD will update its public website with information regarding the requirements for maintenance bypasses, and the CRD's related plans. Subject to completion of the technical work and committee review, the CRD anticipates finalizing the reporting in Q3 2026, and will provide ECCC with a formal update upon completion.

Please let me know if ECCC requires any additional information regarding the CRD's approach at this stage to support regulatory oversight.

Please also advise whether the approach and timeline described above are acceptable for the purposes of addressing the identified non-compliance, or alternatively, that ECCC provide any additional direction necessary to ensure alignment with regulatory requirements.

The CRD remains committed to achieving and maintaining full compliance with the *Fisheries Act* and WSER and to exercising due diligence and best practices in the operation of its wastewater systems.

Best Regards,



Alicia Fraser, P.Eng.
General Manager, Infrastructure and Water Services
Capital Regional District

cc: Ted Robbins, Chief Administrative Officer, CRD
Jason Dales, Senior Manager, Wastewater Infrastructure Operations, CRD