

Document 6 – Backflow Prevention Program Consultation Summary

The consultation was launched on February 17, 2016 and concluded on March 31, 2016. Property owners, industry representatives and other stakeholders were notified of the consultation via a public service announcement, advertisements and social media. A new Backflow Prevention Program web page and email address was established. Information on the consultation and an invitation to attend one of the public meetings was emailed to approximately 1,000 property owners.

There have been over 2,900 visits to the Backflow Prevention Program web page since it was launched in February 2016, including over 2,300 unique visitors – driven largely by online newspaper and social media.

There were 64 participants in attendance at two public meetings and 36 participants at meetings with Ottawa's Building Owners and Managers Association and the City's Institutional, Commercial and Industrial Working Group. There were 34 participants at meetings with Ottawa Community Housing and City departments. Extensive comments, suggestions and questions were shared during these meetings. Only 12 survey responses and written submissions were received.

The key issues and questions from these meetings are highlighted in the points below:

- Notification process: determine when and how property owners, rather than tenants, will be notified of the program requirements and their responsibilities
- Implementation timelines: provide sufficient notice for property owners to budget for costs, consider capacity of the industry to do the work, and allow sufficient time to complete assessments and install devices
- Premise isolation approach: determine what is needed for properties that already have backflow devices installed at hazards, and whether premise isolation is also required, or if existing devices satisfy the program intent
- Site assessment requirements: change the name to site survey, determine what is required and what form will be used, clarify why a survey is needed, confirm when a new survey is needed and when previous work will meet the requirements
- Qualified persons: consider how to track certified professionals and minimize the risk of others doing the work, confirm whether a certified person can sign off on the work of a colleague, and if engineers need to complete the training to conduct site assessments

- Moderate risk buildings: define what multi-residential buildings are included in the moderate risk category and what is a minor risk, confirm that churches are included, and if it applies to buildings slated for demolition
- Device installation: specify the acceptable height requirements for devices, and what is needed for fire protection systems
- Communications: provide clear information that will address questions about the need for the program, the program requirements and the process for registration, site surveys, device installation and annual testing

Similar issues and questions were raised in the surveys and written submissions. They are highlighted in the points below:

- Qualified professionals: the City has a role to help ensure property owners can find qualified people to meet the program requirements
- Tester's license: disagreement as to whether professional engineers should be required to obtain the Certified Tester's License.
- Industry capacity: need to better understand whether there is enough capacity in the industry to implement this program within the proposed timeframe
- Program costs: need to balance water safety with a reasonable timeframe and only necessary requirements to minimize costs to property owners
- Risk-based approach: agreement with proposed approach to address severe risk properties first, and then moderate risks
- Timelines: there are some questions and concerns about whether the program can be implemented within the next four years, given capacity issues and cost implications
- Implementation options: lack of clear support for one option over the other, which indicates that a hybrid solution is likely needed
- Notifications: preference to roll out the program over a period of time to manage the demand, but some would also like to receive advance notification for budgeting purpose
- Site survey: prescribe what needs to be done as part of the site survey

- Extensions: provide additional time for some property owners to meet the requirements if there is justification for this and a plan in place to achieve compliance
- By-law authority: question about the City's authority to implement a retroactive requirement that exceeds the Building Code requirements
- Related projects: need to be aware that implementing this program could trigger the need for other projects, which increases costs for building owners