TORONTO

REPORT FOR ACTION

Sewers and Water Supply By-laws 2025 Compliance and Enforcement Annual Report

Date: May 27, 2026
To: Infrastructure and Environment Committee
From: General Manager, Toronto Water
Wards: All

SUMMARY

This report summarizes Toronto Water's administrative compliance and enforcement responsibilities and activities for 2025 under the City of Toronto's Municipal Code Chapter 681 (Sewers By-law) and Municipal Code Chapter 851 (Water Supply By-law). These by-laws are in place to provide that the City's distribution and collection systems are used responsibly, municipal infrastructure is safeguarded, the environment is protected, and regulatory compliance is maintained.

Through proactive monitoring and enforcement, Toronto Water staff identify violations, work with industrial customers and residents on compliance issues, prevent contamination of drinking water, and advances nearshore water quality and pollution prevention objectives. These efforts have supported cleaner beaches, measurable reductions in pollutants, progress toward delisting areas of concern, and reduced regulatory risks.

In 2025, Toronto Water:

- Undertook over 2,900 compliance and enforcement activities, including investigations of 606 pollution complaints
- Completed over 4,400 sampling events, resulting in over 21,800 laboratory analyses
- Issued 371 Notices of Violation, involving 296 businesses and 4 residential households
- Identified 9 new cross-connections (sanitary wastewater being misdirected to a storm sewer) and verified the resolution of 9 existing cross-connections, improving water quality at affected outfalls
- Supported legal action against 9 companies, leading to 8 convictions and $199,000 in fines
- Recovered $18.3 million from Industrial Waste Surcharge Agreements and Sanitary Discharge Agreements to offset the impacts of discharges with higher-than-normal concentrations of treatable parameters on infrastructure and treatment processes

RECOMMENDATIONS

The General Manager, Toronto Water, recommends that:

1. The Infrastructure and Environment Committee receive this report for information.

FINANCIAL IMPACT

There are no financial implications to the City as a result of this report.

The Chief Financial Officer and Treasurer has reviewed this report and agrees with the financial impact information.

DECISION HISTORY

On November 27, 2007, the Executive Committee requested the General Manager of Toronto Water to report annually to the Public Works and Infrastructure Committee on compliance and enforcement activities related to the Sewers By-law.

Following the restructuring of the City's standing committees, the General Manager of Toronto Water began reporting to the Infrastructure and Environment Committee and submitted the following reports to the August 19, 2021, May 25, 2022, June 5, 2023, July 3, 2024, and June 11, 2025 meetings respectively:

Sewers and Water Supply By-laws 2020 Compliance and Enforcement Annual Report
https://www.toronto.ca/legdocs/mmis/2021/ie/bgrd/backgroundfile-170285.pdf
Sewers and Water Supply By-laws 2021 Compliance and Enforcement Annual Report
https://www.toronto.ca/legdocs/mmis/2022/ie/bgrd/backgroundfile-225670.pdf
Sewers and Water Supply By-laws 2022 Compliance and Enforcement Annual Report
https://www.toronto.ca/legdocs/mmis/2023/ie/bgrd/backgroundfile-236718.pdf
Sewers and Water Supply By-laws 2023 Compliance and Enforcement Annual Report
https://www.toronto.ca/legdocs/mmis/2024/ie/bgrd/backgroundfile-246777.pdf
Sewers and Water Supply By-laws 2024 Compliance and Enforcement Annual Report
https://www.toronto.ca/legdocs/mmis/2025/ie/bgrd/backgroundfile-255787.pdf

COMMENTS

BACKGROUND

Toronto Water is responsible for enforcing the Sewers By-law (Municipal Code Chapter 681) and the Water Supply By-law (Municipal Code Chapter 851). These by-laws are essential to safeguarding public health, municipal infrastructure, and the natural environment by regulating the responsible use of the City's water and wastewater systems.

The Sewers By-law regulates discharge to both the sanitary and storm sewer systems, with a focus on controlling pollutants from industrial, commercial, and institutional (ICI) properties. Toronto Water conducts routine inspections, sampling, and permitting to prevent harmful substances from entering wastewater treatment facilities, stormwater systems, and ultimately receiving waters such as rivers, creeks, and Lake Ontario.

The Water Supply By-law protects the integrity of Toronto's drinking water distribution system by requiring the installation and maintenance of backflow prevention devices at ICI and multi-residential properties. These devices prevent contaminants from entering the potable water system during pressure fluctuations or cross-connections.

Together, these by-laws support strategic environmental and operational objectives, such as:

- **Improved Nearshore Water Quality**: The identification and remediation of sewage cross-connections, combined with stormwater outfall monitoring and the regular monitoring and enforcement of stormwater discharge, spill responses, and pollution complaint investigations, have contributed to measurable improvements in the water quality of Toronto's nearshore areas.

- **Remedial Action Plan (RAP) Progress and Delisting**: Compliance with the Sewers By-law, administration of Industrial Waste Surcharge Agreements and Permits, and administration and management of the Pollution Prevention (P2) Program all support the City's commitments under the Toronto and Region Remedial Action Plan(1). These programs contribute directly to actions aimed at improving aquatic habitat, sediment quality, and reducing water use restrictions in the Area of Concern which extends from north shore of Lake Ontario from Etobicoke Creek in the west to the Rouge River in the east.

- **Pollutant Reduction:** Compliance monitoring and targeted pollution prevention initiatives have improved the quality of wastewater, reducing the environmental impact of wastewater treatment. Toronto Water enforces compliance through inspections, sampling, orders and other remedial measures and prosecutions.

(1) Toronto & Region Remedial Action Plan, https://torontorap.ca/

- **Infrastructure and Compliance Risk Mitigation:** By taking measures to provide only compliant discharges enter the sewer system, Toronto Water reduces the risk of infrastructure damage, costly treatment upgrades, and non-compliance with provincial and federal regulations.

Toronto Water's compliance program uses a combination of approaches to raise awareness of its by-laws and requirements, including education, collaboration to help establish compliance, continuous monitoring and where necessary, enforcement action. When violations are identified, Notices of Violation are issued. Where necessary, legal action or immediate orders are used to address risks to health or the environment. This approach promotes long-term behavioural change among regulated parties and supports continuous improvements in environmental quality and service delivery.

Toronto Water will be undertaking a comprehensive internal review of Municipal Code Chapter 681 - Sewers in 2026/2027. The review will focus on strengthening Toronto Water's connection between service delivery, strategic environmental and operational objectives.

COMPLIANCE AND ENFORCEMENT PROGRAM AREAS

The following provides information regarding major compliance and enforcement program areas and details of activities in 2025.

Major program areas are:

1) Sewers By-law Compliance – Industrial Inspections and Sampling Program
2) Industrial Waste Surcharge Agreements and Permits
3) Sanitary/Storm Discharge Agreements and Permits
4) Compliance Program/Agreements
5) Spills & Pollution Complaints
6) Pollution Prevention (P2) Program
7) Storm Sewer Outfall Monitoring Program
8) Water Supply By-law Compliance and Enforcement
9) Collaborative Surface Water Monitoring Programs

1) Sewers By-law Compliance – Industrial Inspection and Sampling Program

This program monitors industrial compliance with the Sewers By-law with the objective of preventing harmful contaminants from entering the City's sewer system. The potential for non-compliance for businesses is determined by factors such as industry type, on-site activities, and past sampling results. The frequency of inspections and sampling is then set accordingly.

In 2025, nearly 900 inspections and over 4,100 samples were completed under this program. Those sites with a high potential for non-compliance with the Sewers By-law are carefully monitored every two months.

Table 1: Breakdown of Various Activities in 2025 at Industrial and Commercial Sites

Activity	**Number Completed**
Industrial, Commercial and Construction Site Sampling	4,158
High Potential Industry Inspections	32
Medium Potential Industry Inspections	98
Automotive, Restaurants, Spill Follow-up, and other Commercial Facility Inspections	567
Construction Site Inspections	176
Dye Testing to Confirm Discharge to City Sewers	231
Compliance Meetings	47

Convictions – Sewers By-law

The primary objective is to assist companies in understanding and meeting their obligations under the Sewers By-law, and to gain compliance through education and voluntary corrective action. When a Sewers By-law violation is identified, a Notice of Violation is issued. Depending on the circumstances, the individual or business involved may be given the opportunity to resolve the issue voluntarily. However, if immediate action is required, an Order to Comply can be issued requiring prompt corrective measures. Recurring, multiple, or severe violations will result in charges under the relevant by-laws, with case management transitioning to the City's Legal Services' Prosecutions Section. Table 2 provides an overview of activities related to sewer compliance and enforcement.

Table 2: Sewers By-law Compliance and Enforcement Activities 2025

Activity	**Number of Activities**
Inspections	1,125
Lab Tests Conducted	15,096
Notices of Violation Issued	369
Pollution Complaints	606
Investigations*	17
Prosecutions**	9
Convictions***	8
Withdrawn where charges laid****	0

Fines (excluding 25% victim fine surcharge)	$199,000

* Some companies were investigated multiple times for different violations/occurrences; thus, the number of investigations can be higher than the actual number of companies who were issued summonses.

** Prosecution refers to the total number of summonses issued to companies or individuals, with some companies receiving multiple summonses in a year. Summonses can include multiple violations. For 2025, 9 companies received summonses for offences under the Sewers By-law. There may be companies who were under investigation in 2025 and have pending summonses to be issued in 2026.

*** Convictions may include multiple prosecutions for a company or individual and may include prosecution files initiated in prior years and concluded in 2025. Convictions are reported by company or individual, not by the number of individual counts convicted on.

**** Charges that were laid and later withdrawn following a global resolution with a similarly charged or jointly charged company having been convicted.

Attachment 1 of this report references the individual categories of violations in 2025.

For detailed information on the 2025 convictions under the Sewers By-law, see Attachment 2 of this report.

2) Industrial Waste Surcharge Agreements and Permits

There are five treatable pollutants permissible under an IWSA at Toronto's wastewater treatment plants include:

1) Biological Oxygen Demand (BOD)
2) Total Suspended Solids (TSS)
3) Total Phosphorous (TP)
4) Phenols
5) Total Kjeldahl Nitrogen (TKN).

Businesses found to be exceeding the sanitary sewer discharge by-law limits for these treatable parameters can achieve compliance with the Sewers By-law by adopting more effective treatment processes, undertaking pollution prevention measures, or entering into an Industrial Waste Surcharge Agreement (IWSA) with the City.

The IWSA surcharge recovers the extra treatment costs incurred by the City and provides a financial incentive to businesses to either reduce or eliminate their high strength discharges. The City takes a composite sample from a company’s premises to evaluate the wastewater quality. The results determine the fees the company must pay the City for treating the discharge above the By-law limits.

Since April 1, 2019, the program used a formula for calculating IWSA surcharge fees on all the treatable parameters to enable Toronto Water to recover the associated wastewater treatment costs. This approach was phased over a six-year period using an annual adjustment factor. The implementation of the adjustment factor was complete as of April 1, 2025.

Table 3: Treatable Parameter Fees for Toronto Water IWSA

	Treatable Parameter			
	BOD / Phenolics (4AAP)	**Total Suspended Solids**	**Total Phosphorous**	**Total Kjeldahl Nitrogen**
Rates ($/Kg)	$0.64	$0.70	$2.24	$1.43

Table 4: 2025 IWSA Program Details

Businesses with Active IWSA	380
Industrial Waste Surcharge 2025 Recoveries	$11.37M
Industrial Waste Surcharge Permit Recovery	$500

Details on surcharge dischargers, their 2025 status, and companies under an IWSA are documented in Attachment 3 of this report.

3) Sanitary/Storm Discharge Agreements and Permits

The City enters into agreements with, and issues permits to applicants and property owners who draw from private water sources (e.g. groundwater and forms of collected water) and discharge into the City's sanitary, combined, or storm sewers. Fees are assessed based on the volume of water discharged into the City's sewers that require wastewater treatment.

Storm sewers flow into watercourses, rivers, and Lake Ontario. Discharges to these sewers are not subject to a fee but must meet specific quality and quantity requirements.

Table 5: 2025 Sanitary/Storm Discharge Agreements and Permits Statistics

Active Agreements	901
New Agreements	398
New Permits	8
Applicants Engaged	264
Sanitary Discharge Permit Recoveries*	$50,000
Sanitary Discharge Agreements Recoveries**	$6.91M

*Permits are issued when discharge activities are to be completed within a short period of duration and the discharge fee will not exceed $20,000.

**Agreements are issued when the discharge activities are long-term (perpetual), and the discharge fee will exceed $20,000.

4) Compliance Program/Agreements

Section 7 of the Sewers By-law permits businesses whose discharges do not comply with the by-law parameter limits to submit a compliance plan application to the General Manager for review. The plans are reviewed to ensure activities taking place will result in the prevention or reduction of excess pollutants from the business entering the sewer infrastructure. Once a Compliance Agreement is approved, the company is permitted to temporarily exceed the by-law discharge limits while undertaking capital upgrades and implementing prevention measures according to an agreed schedule.

Compliance agreements have been found to be an effective tool for encouraging compliance as they provide a proactive approach to resolving issues collaboratively, reducing the need for escalated enforcement measures. The agreement is designed so that the company achieves compliance by the conclusion of the agreement and includes a requirement for regular sampling and progress reporting to the City. Failure to meet the conditions outlined in the agreement may result in its termination and enforcement measures to be taken.

Table 6: 2025 Compliance Program/Agreement Statistics

Compliance Agreements Issued 2025	4
Effluent quality improvements activities	1 pollution prevention measures
Effluent quality improvements activities	3 enhanced/installed wastewater treatment systems

Details of these agreements are listed in Attachment 4 of this report.

5) Spills and Pollution Complaints

In 2025, Toronto Water's Provincial Offences Officers responded to 606 reports of potential spills and pollution complaints from the Ministry of the Environment, Conservation and Parks or members of the public. Overall, this reflects a 13% decrease in reported potential spills and pollution complaints from the previous year.

While complaint volumes can fluctuate year to year due to seasonal conditions and reporting behaviours, this reduction is encouraging and may reflect the impact of ongoing outreach initiatives by Toronto Water.

6) Pollution Prevention (P2) Program

This program requires industries discharging any amount of the 33 identified subject pollutants in the Sewers By-law to submit and maintain a P2 Plan. Plans must continue to be submitted until that business continually meets the requirements of, and is participating in, a Best Management Practices (BMP) plan. A BMP is intended to assist commercial businesses in improving their environmental performance and minimizing contaminants discharged to the sewers along with any impact their operations may have on the quantity and quality of wastewater.

Approximately 5,500 facilities fall under the P2 Program. In the over two decades the P2 program has been in place, it has been instrumental in proactively reducing pollution at the source. This has led to significant improvements in both industrial and commercial practices. By encouraging businesses to be more mindful of their waste disposal, the program has successfully addressed specific pollutants in the wastewater stream. These targeted efforts have not only enhanced the quality of the City's biosolids but have also expanded their beneficial applications, including agricultural land use, pelletization, and mine reclamation.

Table 7: Pollution Prevention 2025 Reporting Statistics

Sectors	**Total Number of Facilities**	**Compliance Rate**
Autobody Refinishing	323	79%
Automotive Services	2,737	68%
Dental Offices	1,304	99%
Photo Labs	9	89%
Metal Finishing	57	98%
Printing	111	97%
Non-Sector*	174	91%

Manufacturing	95	96%
Dry Cleaners & Commercial Laundry	155	81%
Textile and Industrial Laundry	18	94%
Hospital/Health Care	41	93%

* Includes any industry that is not listed as a subject sector in Appendix 1 of the Sewers By-law.

Many sectors, including dental offices, hospital/health care, and metal finishing, typically have high P2 and BMP compliance rates. These sectors are more likely to have the resources required to maintain and document compliance. In contrast, sectors such as autobody refinishing and automotive services, which have lower compliance rates, typically lack these resources. The high turnover in some industries also makes it difficult for the City to track whether a business is out of compliance or if it has ceased operation. As a result of these factors, compliance rates can vary considerably year over year.

A targeted review of the automotive sector will be undertaken in 2026, as part of a proactive compliance strategy. The desired outcome of this review is to provide insight on current compliance with the by-law and identify opportunities to address non-compliance with the submissions of BMPs. It will also focus with providing opportunities for education and guidance to help encourage compliance where needed.

7) Storm Sewer Outfall Monitoring Program

Toronto Water oversees the Outfall Monitoring Program (OMP), which monitors water quality at outfalls (the point where municipal storm sewers exit into the environment via the city’s waterways). There are more than 2,600 outfalls throughout the city’s watercourses. Improper "cross connections" are when sanitary sewer pipes are incorrectly connected to the storm sewer. When this happens, it allows wastewater to enter the storm sewer system, eventually impacting the quality of Toronto's waterways and Lake Ontario. The Sewers By-law establishes storm sewer discharge limits for a number of parameters (in Table 2 of the by-law). Under the OMP, samples collected at outfalls are analyzed for these parameters, as well as for elevated levels of bacteria and phosphorus, which can indicate sanitary cross-connection contamination. Outfalls showing potential sanitary cross-connection contamination are termed high priority and are further investigated to identify the source. Any corrective action is then pursued through enforcement under the Sewers By-law.

In 2025, Toronto Water completed 48 outfall surveys along the Rouge River, resulting in one new priority outfall (RRM14) being added to Toronto Water's priority outfall list for further investigation in 2026. Outfall surveys include documenting the geographical location, construction material, overall condition, and photos. If an outfall has dry weather flow, samples are collected for laboratory analysis. These surveys support effective planning and help guide the appropriate next steps.

In addition, several sanitary cross-connections were identified in 2025 following odour complaints from residents related to storm sewer infrastructure. Toronto Water identified the source and took the necessary corrective action, which resulted in the removal of one priority outfall (BC114) in the Black Creek watershed and improvements in stormwater quality.

The OMP plays a critical role in maintaining and improving stormwater quality. As a result of ongoing efforts made under this program, the health of receiving water bodies continues to show measurable improvement. A 2025 Progress Report of the Parties highlights that continued cooperation on both sides of the border have contributed to meaningful environmental improvements across the Great Lakes basin, including enhanced water quality and healthier beach conditions(2). One project that will contribute to this effort, is the Ashbridges Bay Treatment Plant Outfall project. This project involves the construction of a new 3.5km outfall tunnel under Lake Ontario for the release of treated effluent, which will significantly improve water quality.

Table 8: 2025 Data on Cross Connections Found and Addressed, Priority Outfalls, Outfalls of Concern and De-listed Priority Outfalls

Precipitation (mm/year)	777
Cross Connections Found	9
Cross Connections Corrected	9
Total Priority Outfalls*	49
Outfalls of Concern**	0
Delisted Priority Outfalls	1

*Priority outfalls are defined by discharge concentration levels exceeding twice or more times the storm sewer limit under the Sewers By-law or if there is an Escherichia Coli (E. Coli) bacteria concentration greater than 10,000 colony-forming unit (cfu) per 100ml.

**Outfalls of Concern are those that do not have enough sampling data and require additional monitoring.

(2) 2025 Progress Report of the Parties, https://binational.net/wp-content/uploads/2026/01/Progress-Report-of-the-Parties-2025.pdf

Table 9: Summary of 2025 Stormwater Related Activities

Activities	**Total Completed**
Inspections*	345
Sampling Events	294
Laboratory Analyses	6,781

Notices of Violation Issued	5

*Inspections include sewer tracing and dye testing within sewer sheds ranging in size from approximately 1 kilometer to over 20 kilometers in length.

Attachment 5 of this report summarizes cross connections identified and corrected in 2025.

Attachment 6 of this report summarizes priority outfalls, outfalls of concern, and delisted outfalls for 2025.

8) Water Supply By-law Compliance and Enforcement

Administered by Toronto Water since 2008, the Backflow Prevention Program involves the inspection of industrial, commercial and institutional properties to verify compliance with the backflow prevention provisions of the Water Supply By-law.

Toronto Water did not find any violations in 2025 that necessitated orders, investigations or prosecutions under the Water Supply By-law.

Table 10: Water Supply By-law 2025 Compliance and Enforcement Activities

Activity	Total Completed
Inspections	303
Notices of Violation Issued	2
Fire Hydrant Complaints	6

For detailed information on the 2025 convictions under the Sewers and Water Supply By-laws, see Attachment 2 of this report.

9) Collaborative Surface Water Monitoring Programs

Parks and Recreation, Toronto Public Health and Toronto Water continue to partner on the Beaches Monitoring Program. In accordance with the Ministry of Health and Long-Term Care’s Recreational Water Protocol 2019, Toronto's beaches are monitored for E. coli, an indicator of water quality. From late May to Labour Day, water samples are collected 7 days a week at each of the City's ten supervised beaches and analyzed for E. coli levels. Results are provided to Toronto Public Health, which determines whether beaches are posted as safe for swimming. Toronto's beaches are currently posted as unsafe for swimming if E. coli levels exceed 100 colony-forming units (cfu) per 100mL of water, a threshold more stringent than provincial or federal mandates water quality standards.

In 2025, 5,698 water samples were taken, and 111 beach reports were completed. Notably, in 2025, seven of the City's beaches were awarded the internationally recognized Blue Flag designation for meeting exceptional recreational water quality.

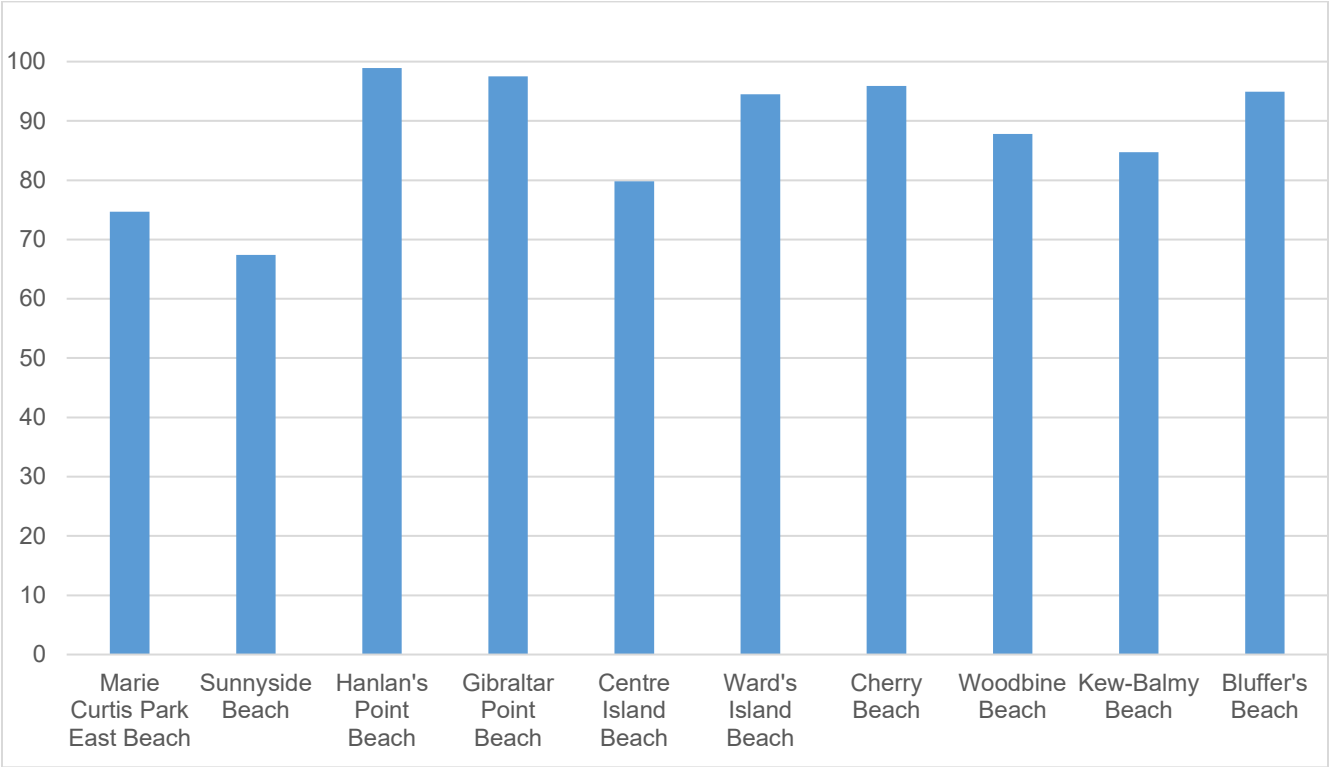

Figure 1: Percentage of Days Supervised Swimming Beaches in Toronto were posted safe to swim in 2025

Table 11: Percentage of Days Supervised Swimming Beaches in Toronto were posted safe to swim in 2025

	Days Posted Safe to Swim	Days Posted Unsafe to Swim	Days Posted Data Unavailable	% Days Posted Safe to Swim
Marie Curtis Park East Beach ***	65	22	12	75
Sunnyside Beach ***	62	30	7	67
Hanlan's Point Beach	91	1	7	99
Gibraltar Point Beach	78	2	19	98
Centre Island Beach **	67	17	15	80
Ward's Island Beach	86	5	8	95
Cherry Beach	94	4	1	96
Woodbine Beach	86	12	1	88
Kew-Balmy Beach	83	15	1	85
Bluffer's Beach	93	5	1	95

* Toronto Public Health beach statuses are posted as follows: Safe to swim, Caution is advised or Data unavailable.

** The percentage of beach openings at Centre Island Beach has declined since 2022 ranging between 72% and 80%. Discussions with Parks and Recreation and Toronto Public Health are ongoing, and a microbial source tracking study will be underway during the 2026 swimming season to better understand the underlying causes.

*** Water quality at Marie Curtis East Beach and Sunnyside Beach is influenced by flows from Etobicoke Creek and the Humber River, respectively. These watercourses receive E. coli inputs from extensive upstream watersheds that extend beyond the City's

boundaries. Ongoing efforts to identify pollution sources are underway as part of the outfall monitoring program.

The presence of E. coli indicates fecal contamination but does not identify the source, as it can originate from humans, mammals, and birds. To better distinguish between different sources of fecal contamination, Toronto Water will undertake a microbial source tracking initiative in the summer of 2026. The results of this initiative will be shared with Parks & Recreation and Toronto Public Health to better target mitigation efforts and support more informed water quality decision-making.

CONTACT

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SIGNATURE

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ATTACHMENTS

Attachment 1 - Sewers By-law Violations in 2025 by Category

Attachment 2 - 2025 Sewers and Water Supply By-law Convictions

Attachment 3 - Companies with Industrial Waste Surcharge Agreements, as of December 31, 2025

Attachment 4 - List of Companies with a Compliance Agreement in 2025

Attachment 5 - 2025 Outfall Monitoring Program (OMP) Cross-Connection Summary

Attachment 6 - Comparison of 2024 and 2025 Priority and De-listed Outfalls