

Goal	Proposed Actions	How	Discussion Questions	Comments
1	Establish priorities of water use in the Water Taking and Transfer Regulation	Amend the Water Taking and Transfer Regulation (O. Reg. 387/04)	<p>1. Do you support including priorities of water use in regulation? Why or why not?</p> <p>2. How should priorities of use be applied to water taking decisions? When should it be applied? What process should be followed? Who should be involved? What information should be considered?</p> <p>3. Municipal drinking water supply is proposed as a highest priority use. What</p>	<p>1. Agree that priorities need to be established in the order as identified ie. environment/drinking water, agricultural, industrial/commercial and cosmetic. Golf courses should be considered cosmetic. Health and welfare of people always must come first.</p> <p>2. Projected use of water in the planning horizon of 30 years should be undertaken taking into consideration factors such as growth, climate change etc. This should be undertaken by the cities, counties, and townships in concert with the local CA and MOECP.</p> <p>3. At a minimum the anticipated needs for the 30 year planning horizon should be used.</p> <p>4. Agree that priorities need to be established. i.e. environment/drinking water, agricultural, industrial/commercial and cosmetic. Golf courses should be considered cosmetic. Health and welfare of people always must come first.</p> <p>5. Projected use of water in the planning horizon of 30 years should be undertaken taking into consideration factors such as growth, climate change etc. This should be undertaken by the cities, counties, and townships in concert with the local CA and MOECP.</p> <p>6. The suggestion that Municipal drinking water supply should be the highest priority use raises some concerns. Drinking water for rural residents on a private communal system or private well is just as important to residents as drinking water for residents connected to a municipal supply. Also some municipal systems are fully consumptive groundwater based</p>

			<p>municipal drinking water needs should be considered a priority (e.g., current, planned growth, longer-term growth)?</p>	<p>systems that draw their water from ground water supply wells and discharge the waste water into a river. Where as private rural systems are either no loss non consumptive or only partial loss systems since they return the water back into the ground locally. Many municipal systems are also no loss non consumptive or only partial loss where they draw their water from a river or lake and return that water back to the same source. So Water taking should be directed away from full loss consumptive groundwater dependant municipal systems and more towards no loss or limited loss surface water systems. For all cases at a minimum the anticipated needs for the 30 year planning horizon should be used.</p>
1	Provide guidance on applying priorities of water use	Guidance to be developed		Should be done in concert with potentially affected municipalities.
2	Add authority in regulation to manage water takings on an area basis	Amend the Water Taking and Transfer Regulation (O. Reg. 387/04)	<p>1. Under what circumstances should the ministry consider assessing and managing water takings on an area basis?                  2. What suggestions do you have for the process of assessing and developing a strategy to</p>	<p>1.The Ministry should be doing it now as there is a perceived concern by the public.</p> <p>2.Local potentially affected municipalities, must be consulted as is done for current Tier 3 studies. Water taking quantities should not be based on the long term rate but rather what is required. It is improper when there is a drought and a reduction in water taking is requested, that the large water takers justify not reducing by stating they are under permitted maximum taking. Refer to p7 of</p>

			<p>manage water takings on an area basis? For example, how should local water users, stakeholders, and Indigenous communities be engaged?</p> <p>3. How can the province help water users be more prepared for drought?</p>	<p><i>“A Report of a Panel of Independent Experts Assembled by Professional Geoscientists Ontario Submitted to MECP on May 19, 2020”</i></p> <p>3.Engagement of general public through the municipalities with outreach programs and legislate penalties for industrial/commercial water takers.</p>
<b>2</b>	Update existing guidance for managing water takings on an area basis	Guidance to be developed		Should be done in concert with potentially affected municipalities.

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2	Develop additional guidance for managing water takings in drought conditions	Guidance to be developed		Should be done in concert with potentially affected municipalities.
2	Replacing high use watershed maps and prohibitions in the regulation	Amend the Water Taking and Transfer Regulation (O. Reg. 387/04)		There should be a source document to indicate the cumulative water takings in a particular area.
3	Enable sharing of water quantity data	Amend Water Taking and Transfer Regulation (O. Reg. 387/04) and Environmental Activity Sector Registry (EASR) - Water Taking Regulation (O. Reg. 63/16)	<p>1. Is there any water quantity and monitoring information reported to the ministry that should not be made publicly available? If so, why?</p> <p>2. Would the proposed online resource be helpful to you? Why or why not? Are there other mechanisms for sharing this information that would be helpful to you?</p>	<p>1.No. The methodology used to assess the viability of granting a PTW should be available for review by the municipalities affected. The municipalities should not need to request a FOI.</p> <p>2. Yes this information as well as the methodology would be most helpful to dispel the notion that the Ministry is not being transparent.</p> <p>3. Individual and cumulative takings, links to reports used to justify the water taking and resultant affect on the water table.</p> <p>4. The information should be in a format that is intuitive for the average person.</p>

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			<p>3. What data would you like to see included in the online resource?</p> <p>4. How would you like to see water quantity data presented? What are the most useful formats (e.g. maps with embedded information, reports, tables, story pages)?</p> <p>5. What water resources information and guidance would you like to see made available to the public?</p>	5. As discussed above.
<b>3</b>	Enhance access to water quantity data	Build dedicated public-facing online resource Review, update existing and develop new water quantity data sets		Comments above

		Regularly communicate information on the state of water resources in Ontario and management programs via the ministry’s water quantity online resource		
4	Require water bottling companies to report whether they have support from the host municipality when applying for a new or expanded water taking	Amend the Water Taking and Transfer Regulation (O. Reg. 387/04)	1. Do you support the proposal to require water bottling companies to seek support from their host municipality when applying for a Permit to Take Water? Why or why not?	<p>1. Yes <u>and for all major</u> water takers. The municipality should be satisfied that the proponent has adequately undertaken the necessary studies and investigations to demonstrate minimal impact on the water table, surface water environment, and quality of water.</p> <p>2. Do not support the singling out of one water use regarding proof that the municipality is a “willing host” and are concerned about the use of the concept of “willing host” without some parameters being attached to this determination.</p> <p>However, we do support requiring an Industrial or commercial applicant for a PTTW to provide confirmation from the host municipality that the land use for which the water is intended to support is a permitted land use on that site and that the host Municipality is satisfied that the proponent has adequately undertaken the necessary studies and investigations to demonstrate that the amount of water proposed to be taken in support of that land use will have minimal impact on the water table, surface water environment, and quality of water.</p>

				<p>For municipal well PTTW’s, the majority of the impacts associated with the municipal water taking can often extend well into neighbouring municipalities that are not connected to that well. This could include impacts to the natural environment as well as impacts to land owners associated with Well Head Protection policies. So for new or renewing municipal PTTW’s, any municipality whose wells and or Well Head Protection areas are located or extend into another municipality, should be required to provide documentation that the impacted municipality is satisfied that the applicant municipality has addressed any concerns that the impacted municipality has raised regarding the impact on the water table, surface water environment, and quality of water as well as addressing any concerns regarding the recovery of any costs related to the presence of the Well Head Protection Areas within the impacted municipality.</p> <p>The proposal to single out one particular subset of beverage bottlers appears to be based on an assumption that the natural environment is capable of responding differently depending on what is added to the water prior to packaging. However, since the natural environment does not change it’s response based on what is or is not added to the water prior to packaging but what is being packaged is of relevance to the zoning of the property, it should be the land use planning process that determines if the proposed land use that the water is intended to support, is an</p>
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				<p>appropriate land use for the site regardless of the proposed land use. Additionally, municipal takings are far larger than individual commercial or industrial takings and are often 10 or 20 times greater than the takings used for water bottling. Considering the assessments done by independent experts, “determined that bottled water takings in Ontario are not impacting the sustainability of groundwater resources While the much larger municipal takings of groundwater are understood to have a much larger impact on the local aquifers and there are ongoing costs born by neighbouring rural municipalities to protect these large municipal supplies, it would make the most sense to apply any “willing host” test to the largest takings rather than exclusively to one of the smaller takings.</p>
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