



November 17, 2020

Brent Taylor
Senior Policy Analyst, Environmental Policy Branch
Ministry of the Environment, Conservation and Parks
40 St. Clair Avenue West
Toronto, ON
M4V1M2

Re: Conservation Ontario's comments on the "Proposal to require municipal support for new or increased bottled water takings" (ERO #019-2422) and Schedule 18 of Bill 213, *Better for People, Smarter for Business Act, 2020*

Dear Mr. Taylor,

Thank you for the opportunity to provide comments on the proposal to require municipal support for new or increased bottled water takings (ERO #019-2422) and Schedule 18 of Bill 213, *Better for People, Smarter for Business Act, 2020*. Conservation Ontario is the network of Ontario's 36 conservation authorities who recognize that water security during times of drought, and sustainable water resources overall, are vital to a healthy economy. These comments are not intended to limit consideration of comments shared individually by conservation authorities.

As per our July 31, 2020 comments on "Updating Ontario's Water Quantity Management Framework" (ERO#019-1340), Conservation Ontario is supportive of the proposal to require water bottling companies to first seek support from the council of their host municipality when applying for a new or expanded permit to take groundwater for the purpose of producing bottled water. Increased consultation with the host municipalities will serve to improve the level of collaboration in the management of Ontario's water resources. This approach will allow municipalities to review long-term growth plans and determine if the proposed 100% consumptive water taking would interfere with municipal plans for longer-term growth.

Through our previous comments, Conservation Ontario identified the concern that water sources may cross multiple municipal boundaries and impacts from a water taking may not be restricted to the 'host' municipality where the water bottling company is proposing to locate.

To address this, Conservation Ontario recommended that support be obtained from all affected municipalities prior to applying for a permit to take water from the Ministry of the Environment, Conservation and Parks. It is our understanding that this concern will be addressed by the fact that applications which receive municipal council support will still undergo technical review, including drinking water source protection considerations, by the Ministry and, as part of this review, will be posted to the Environmental Registry for public comment, with notification sent to all affected municipalities and conservation authorities.

Thank you for the opportunity to provide comments on the proposal to require municipal support for new or increased bottled water takings (ERO #019-2422) and Schedule 18 of Bill 213, *Better for People, Smarter for Business Act*, 2020. Should you have any questions about this letter, please contact myself at 905-717-2008, or Deborah Balika, Conservation Ontario Source Water Protection Lead, at 905-251-2802.

Sincerely,

A handwritten signature in cursive script that reads "Bonnie Fox". The signature is written in black ink and is positioned above the printed name and title.

Bonnie Fox
Manager, Policy and Planning

cc. All CA CAOs/GMs