



**Ontario Federation of Agriculture**

**Ontario AgriCentre**

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November 23, 2016

Mr. Leo Luong, Manager  
Ministry of the Environment and Climate Change  
Climate Change and Environmental Policy Division  
Land and Water Policy Branch  
40 St. Clair Avenue West, Floor 10  
Toronto, ON M4V 1M2

[moecc.waterpolicy@ontario.ca](mailto:moecc.waterpolicy@ontario.ca)

Dear Mr. Luong,

The OFA is pleased to have this opportunity to respond **EBR #012-8783: A regulation establishing a moratorium on the issuance of new or increasing permits to take water for water bottling.**

The OFA is Canada's largest voluntary general farm organization, representing over 36,000 farm families across the province. These farm businesses form the backbone of a robust food system; helping to drive the Ontario economy forward.

Farmers are integral partners in managing the natural environment. They rely on the air, soil and water to conduct their business, and as such, have a vested interest in the sustainability of these resources. Because of the nature of agriculture in Ontario, and the fact that farmers interact intimately with the natural environment on a daily basis, an agricultural perspective to water resource management is critical.

While the focus of this EBR posting is on establishing a moratorium on Permits To Take Water (PTTW) for new or increasing water bottling, there are other aspects alluded to within the posting that are of primary interest to OFA. Specifically, the agricultural community is interested in the proposed steps that will be taken if this moratorium is imposed, such as examining water pricing and other tools; reviewing water taking rules; and advancing knowledge of water resources. It is critical that the agricultural community is actively engaged from the very beginning of conversations regarding all three aspects.

The agricultural sector holds approximately 64% of all of the PTTW across the Province. Any discussions regarding potential changes to the program must include this sector. This program must understand the realities of this sector and work to ensure that any proposed changes accommodate the unique nature of agricultural water takings.

In late 2010, OFA was asked by the Ministry of Economic Development and Trade (MEDT) to coordinate the agriculture and agri-food sectors response to the Open for Business Initiative.

Through this initiative, OFA was able to work closely and collaboratively with the government to address concerns arising with the PTTW program for agricultural users. We were also able to reaffirm the reasoning behind specific aspects of the existing program. It was a very successful working arrangement for all involved.

The OFA looks forward to working closely with the Province in reviewing all aspects of the PTTW program. Please contact Tina Schankula, OFA Policy Researcher at 416-559-4962 or [tina.schankula@ofa.on.ca](mailto:tina.schankula@ofa.on.ca) to initiate these conversations.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith Currie", is centered on a light gray rectangular background.

Keith Currie  
President