

December 12, 2019

Shari Sookhoo  
Ministry of the Environment, Conservation and Parks  
Environmental Policy Branch  
40 St Clair Avenue West  
Floor 10  
Toronto, ON  
M4V 1M2

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

Dear Ms. Sookhoo,

**RE: Environmental Registry of Ontario posting 019-0913 Proposal to extend the current moratorium on water bottling permits**

The OFA is pleased to have this opportunity to respond to ERO 019-0913 - Proposal to extend the current moratorium on water bottling permits.

The Ontario Federation of Agriculture (OFA) is Canada's largest voluntary general farm organization, representing more than 38,000 farm family businesses across Ontario. These farm businesses form the backbone of a robust food system and rural communities with the potential 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.

OFA is in favour of extending the existing moratorium on Permits To Take Water (PTTW) for new or increasing water bottling while the Ministry looks to “complete its analysis of the water quantity review and to publicly consult on and finalize changes to how we manage water takings before the moratorium ends.”

OFA recommends that the Ministry work directly with the agricultural community regarding proposed changes to the PTTW program and policies. The agricultural sector holds approximately 64% of all PTTW across the Province. Therefore, it is essential that the agricultural community is included in any discussions regarding potential changes to the PTTW program. The realities of agriculture must be clearly understood to ensure that any proposed changes accommodate the unique nature of agricultural water takings.



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The OFA looks forward to working closely with the Province in reviewing the PTTW program.

Sincerely,

A handwritten signature in black ink, appearing to read 'Keith Currie', written over a light grey rectangular background.

Keith Currie  
President

cc: OFA Board of Directors