

November 19, 2020

Juwairia Obaid
Senior Program Advisor, Policy and Program Development
Ministry of Environment, Conservation and Parks
135 St Clair Avenue West
Toronto, ON
M4V 1P5

Via email: Juwairia.obaid@ontario.ca

Dear Ms. Obaid,

Re: ERO 019-2525 - Proposed amendments to regulations made under the *Environmental Protection Act* and *Ontario Water Resources Act* to make modifications to Environmental Activity and Sector Registry requirements and exemptions for low risk short-term water taking activities

OFA appreciates the opportunity to provide comments with respect to the Ministry of Environment, Conservation and Parks' proposed regulatory changes under the *Environmental Protection Act* and *Ontario Water Resources Act* to streamline permissions for certain low risk short-term water taking activities.

OFA has significant concerns surrounding this proposal. Examples exist of substantial interference with wells and water sources caused by these types of 'low risk and short-term water takings', particularly with construction dewatering. This proposal fails to address issues respecting interferences such as these, nor does it provide a process to resolve these concerns. A loss of water to wells and water sources due to these activities can result in a lack of drinking water for livestock and potential crop losses, not to mention impacts on personal/household uses. OFA believes there must be a clear system in place for checks and balances to ensure that the water supplies used by other water users are not interrupted or significantly impacted by these types of 'low risk and short-term water takings'. OFA strongly recommends the implementation of a process to ensure farm operations are supplied adequate water and provided financial compensation for losses and/or increased costs when other water users cause an interruption to critical water sources.

OFA encourages the Ministry to consider including well rehabilitation in the exemptions under this proposal. In this sense, we are referring to rehabilitation as cleaning out a clogged well, for example. It would be minor in scope with little likelihood of impacting other water users. We believe that well rehabilitation should also be subject to a system that protects impacted water users, as discussed above.

We trust our opinions and recommendations will be given due consideration in this consultation.



The Ontario Federation of Agriculture (OFA) is the largest general farm organization in Ontario, proudly representing more than 38,000 farm family members across the province. OFA has a strong voice for our members and the agri-food industry on issues, legislation and regulations governed by all levels of government. We are passionate and dedicated to ensuring the agri-food sector and our rural communities are included, consulted and considered in any new and changing legislation that impacts the sustainability and growth of our farm businesses.

Ontario's diverse and innovative agri-food sector is a powerhouse for the province – growing and producing more than 200 farm and food products, fuelling our rural communities and driving the provincial economy by generating more than 860,000 jobs and contributing over \$47 billion to Ontario's annual GDP. We are the leading agricultural advocate for Ontario farmers, their businesses and their communities.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith Currie", is written over a light blue horizontal line.

Keith Currie
President

cc: OFA Board of Directors