

August 1, 2025

Permissions Modernization Team
Client Services and Permissions Branch
135 St. Clair Avenue West, Floor 1
Toronto, ON M4V 1P5

Submitted via website and permissions.modernization@ontario.ca

Dear Permissions Modernization Team,

Re: ERO # 025-0730: Proposed changes to provide flexibility for water taking activities

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

OFA appreciates this opportunity to provide input on the consultation on “Proposed changes to provide flexibility for water taking activities.” The consultation proposes that, under certain conditions, an expired Permit to Take Water (PTTW) could be renewed through a streamlined process, rather than requiring a new permit application.

OFA is in favour of this proposal as it has the potential to reduce an administrative burden. OFA farmers have encountered the need to apply for a new PTTW due to administrative changes such as a farm that incorporates, undergoes an in-family transfer or succession, or the death of the permit holder, without any changes to the water source, use or quantity.

We are supportive of the proposed criteria for renewing a PTTW – that the water is being taken from the same source, for the same purpose, and in the same or a lesser quantity, thereby not affecting the availability of water resources. These parameters will help ensure that water resource availability remains unaffected. However, we recommend that any conditions attached to the original permit be carried over to the new permit holder. OFA also recommends that instead of the applications being submitted within one year of the permit’s cancellation, expiry, or revocation, that agricultural PTTW allow for applications within three years.

OFA would also like to re-open dialogue with MECP regarding both the response times by MECP in reviewing both agricultural renewals and new permits; and if there is a means of amending the renewal process so farmers are not required to re-submit documentation

OFA looks forward to the implementation of these proposed changes and further dialogue with the Ministry to reduce this administrative burden while maintaining the integrity and intent of the PTTW system.

Sincerely,



Drew Spoelstra
President

cc: Hon. Trevor Jones, Minister of Agriculture, Food and Agribusiness
OFA Board of Directors

This submission has been approved by the OFA Board of Directors and will be posted to OFA's website: <https://ofa.on.ca/resources/>