

Patrick Spezowka
Supervisor
Ministry of the Environment and Climate Change
Operations Division
Southwestern Regional Office
733 Exeter Road
London Ontario
N6E 1L3
Email: swr-psu@ontario.ca

RE: EBR Registry Number:012-9151: Bottled Water Technical Guidance Document

The Ontario Council of the Canadian Federation of University Women (CFUW Ontario Council) is pleased to respond to EBR 012-9151 – Bottled Water Technical Guidance Document.

CFUW Ontario Council commends the government for its actions to further protect Ontario's vital groundwater resources by strengthening and tightening the regulations and oversight over permitted extraction by the water bottling industry. These changes will enable Ontario to be alert to unsustainable stress on our groundwater resources and to prevent resultant negative effects on the ecosystem.

Proposed New Procedural Requirements:

CFUW Ontario Council is pleased to note the high standard and extent of the mandatory pre-consultation with government qualified persons (QP's) and the extensive public consultation that will be required by government for those companies wishing to obtain a Permit to Take Water (PTTW) licence or to increase or renew an existing PTTW licence.

We are especially pleased to note that the Technical Review must be prepared not only by companies whose proposals are for a new or increased water taking – but also by companies proposing to renew their existing PTTW licence.

We strongly support the change to limit expiry dates to 1-5 years. In five years there can be large changes in conditions that affect a specific site. This could include

- increased development and demand on our groundwater resources in a given area;
- improvements in technology which allow a better ability to measure the groundwater resources and assess any changes to the ecosystem;
- new scientific knowledge and understanding of the cumulative effects of the water taking; and/or
- the potential effects of Climate Change.

It is important that the mandatory reductions in times of drought have been delineated. And we are pleased to see the clear statement that the Director has the discretion, based on reasonable grounds, to amend or revoke a Permit at any time.

Proposed New Technical Requirements:

We commend the procedures that the Ministry will use to guide the technical screening, scientific evaluation and scientific review of proposed water takings from groundwater sources. They are much

stronger and more comprehensive – as are the requirements for the structure and content of the Hydrological study document required for a proposed taking. Both cover a wide range of checkpoints and will flag potential and/or actual unacceptable water quantity or quality interference. This would serve to prevent the approval of or allow the cancellation of unsustainable water-taking. We are especially pleased to note the consideration that will be given to the potential for cumulative effects.

We commend the inclusion of a definition of the term Qualified Person (QP) outlining the specific qualifications required by a QP.

The requirement for baseline data to be collected and used before granting a PTTW approval is an important point. This baseline data will thus be available as a control in reviewing current conditions before granting renewal or increase for a PTTW application.

We are especially pleased to note the extent of the tight daily recording and monitoring of actual takings by PTTW licence holders and the effect of their takings, if any, on the surrounding area. The Groundwater monitoring with its evaluation of the impacts of the taking to the natural functions of the ecosystem is especially important. It is vital to ensure that groundwater elevation levels do not fall and to confirm over time whether there is significant deviation between actual and predicted impacts so that contingency action can be taken and/or so that the PTTW licence can be amended or revoked by the Director.

It is important that all monitoring results will be posted for public review.

We appreciate the fact that the justification for the water taking is linked to and takes into account the Ministry's Statement of Environmental Values (SEV). It will be an important test of the effectiveness of the SEV mandate.

CFUW ONTARIO COUNCIL

Ontario Council of the Canadian Federation of University Women (CFUW) is a voluntary, self-funded, non-profit organization with 54 clubs across the province, which is affiliated with the national CFUW and Graduate Women International.

Our mandate is to promote education and life-long learning, to encourage the participation of members in their communities and to enhance the status of women and girls.

Our main concerns include high quality public education, universal health care, a clean safe environment, the economic security of women as well as the prevention of violence against women.



Sandra Thomson
President, CFUW Ontario Council
president@cfuwontcouncil.ca
president.cfuwontario@gmail.com
www.cfuwontcouncil.ca

Researched and written by Carolyn Day, CFUW Southport, CFUW Ontario Council Environment policy adviser