



Comments on:
Proposed Amendments to the Water Taking and
Transfer Regulations, O.Reg 285/99.

Land Use Policy Branch
Ontario Ministry of the Environment

August 10, 2004

By the

Canadian Federation of University Women
Ontario Council

Submitted by
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Ottawa, August 10, 2004

**Submission RE: EBR # RA04E0011
By The Ontario Council Canadian Federation of University Women**

Dear Mr. Maude:

The Ontario Council of the Canadian Federation of University Women (CFUW) welcomes the opportunity to comment on the Proposed Amendments to O.Reg. 285/99, the Water Taking and Transfer Regulation .

In 2001, CFUW established a policy that:

- declared that water, being a non-renewable natural resource of paramount importance, belongs to the Canadian public and its use must be regulated in the public interest;
- requested that government adopt and implement a sustainable and prudent water management policy to respond to long-term regional needs with due regard to the ecosystem and hydro-geological reality; and
- requested that government promote conservation and more efficient use of surface water and groundwater.

All life depends on a reliable source of clean water to survive. And yet, up until now, there has been no overriding vision from government for a comprehensive policy on water and water management which adequately protects the public interest and the ecological health of our province.

CFUW Ontario Council applauds the commitment of the Government of Ontario to meet the recommendations of the O'Connor Inquiry by strengthening the rules on water-taking with a priority on "the need to protect the natural functions of the ecosystem and a consideration of water availability" and sustainability.

We commend the Ontario Government for the Moratorium on Water Taking (O. Reg. 434/03) imposed in December 2003, especially as it applied to the unrealistic and unsustainable limits given to the OMYA corporation for water taking on the Tay River.

We congratulate the government for its plans, through the amendments to O. Reg. 285/99, "to put new rules in place for water taking and charges for commercial extraction" which put the health of the ecosystem ahead of commercial demands.

Justice O'Connor, in his Report of the Walkerton Commission Inquiry, stressed the importance of watershed planning and the establishment of a "water budget" for each watershed, which would establish water availability within the watershed, and set sustainable limits for water withdrawal from the watershed. He proposed that all significant water withdrawals be identified, including municipal intakes. And he proposed that wherever the total annual amount of water withdrawn exceeded the water budget, negotiations be held among the water takers to bring the total within the budget.

Although the proposed amendments go some way towards realizing this important recommendation, there is no explicit wording that would require a water budget be established as part of each watershed plan, or that would require this water budget be adhered to in each watershed.

CFUW Ontario Council recommends

- **the inclusion of explicit wording that would:**
- **require a water budget be established as part of each watershed plan, and**
- **require that this water budget be adhered to.**

CFUW Ontario Council recommends

- **that a formal Registry be established that would give accurate information on the total water extraction for each watershed area.**
- **that this Registry include total municipal intakes, total limits on all Water Taking Permits issued, as well as total consumable extractions that currently do not require a permit (eg. companies extracting less than 50,000 litres per day, such as small bottling companies)**
- **that the data from this Registry be reviewed and monitored on a regular basis to ensure that it is correct, and that the total extractions do not exceed the water budget in any given watershed area.**

Water bottling companies and beverage manufacturers currently extract a huge volume of water from Ontario water basins and watershed areas. Bottled water and manufactured beverages are consumable products. The water they use is not returned to the watershed from which it is extracted, and results in large profits for the private corporations. At present, these companies are paying no fee to extract the water they use. This does not serve the public interest, or the ecological health of the watersheds.

CFUW Ontario Council recommends

- **that water bottling companies and beverage manufacturers be subject to the same limitations as other commercial businesses, and**
- **that a schedule for extraction charges be set.**

Conservation of our water resources is an important issue. Municipal water systems across Ontario are aging and often inefficient.

CFUW Ontario Council recommends

- **that incentives be established to encourage Municipalities to repair and upgrade inefficient systems and infrastructure.**

CFUW Ontario Council is made up of approximately 6000 women university graduates from all the regions of Ontario. We are totally member - funded. Our members live in 58 Ontario communities, in big urban areas as well as in rural and northern towns. We are non - partisan and non- sectarian. When voting on policy each of our clubs has one vote so that the voice of members from Thunder Bay and Renfrew and St. Thomas have the same weight as those from the Toronto and Ottawa areas. This results in well-balanced policies that may be embraced by most Ontarians.

We are business women, scientists, teachers, university professors, nurses and physicians, seed specialists and engineers, farm women and artists and accountants, wives, daughters, mothers and grandmothers. All put their skills and education at the service of their community, and are active

- § in all public affairs
- § for a high standard in public education,
- § for the improvement of the Status of Women in Ontario, and
- § to ensure Human Rights in the Province.

We are not a charitable fund raising organisation. Our clubs, nevertheless, award more than \$200,000 annually in scholarships and bursaries to students in all the regions of Ontario as well as to charitable and cultural causes.

We are part of the Canadian Federation of University Women (CFUW) and have links to the International Federation of University Women (IFUW)

Our members in all the regions of Ontario have made Water and all policies surrounding this life sustaining resource their priority. We hope that the new Provincial Regulations will help to safeguard this resource and its quality to the benefit of all Ontarians.

Respectfully submitted by,
Edeltraud Neal
President
Ontario Council Canadian Federation of University Women