

November 19, 2020

Brent Taylor
waterpolicy@ontario.ca

Re: Proposal to require municipal support for new or increased bottled water taking, ERO No. 019-2422

Public Works

10 Peel Centre Dr.
Suite A
Brampton, ON
L6T 4B9
tel: 905-791-7800

peelregion.ca

Dear Mr. Taylor:

Thank you for providing us the opportunity to comment on ERO No. 019-2422 - Proposal to require municipal support for new or increased bottled water taking.

The Region of Peel staff acknowledge the Ministry's proposed measures that focus on creating effective communication channels and foster collaboration between interested parties with the aim of protecting the natural environment, including drinking water sources. Further to feedback provided by the Region of Peel staff on July 31, 2020 in response to Ontario's Water Quantity Management Framework (ERO No. 019-1340), we would like to highlight our recommendations.

1. This proposal specifies that the local host municipality, which is the lower or single-tier municipality where water taking is proposed, requires advanced approval through council resolution from the host municipality before applying for a new permit to take water or an increase to existing water takings.

The Region of Peel is the upper tier of a two-tier municipal structure, and owner as well as an operating authority of municipal drinking water systems. Since the lower tier municipalities (Brampton, Caledon and Mississauga) receive all their drinking water from the Region of Peel water systems and since we largely oversees the Source Water Protection program, the Region of Peel would have direct input on supporting or objecting to the proposed new or increased water taking.

Therefore, the Region of Peel staff recommend that all tiers of municipal structure are considered in the approval of requests for new or increased water takings, as both would be potentially affected by the outcomes of the decision.

2. In the event of the municipal council objecting to the proposed water taking, which would result in the application not proceeding for review by the Ministry, the Region of Peel staff asks for clarification around the process of appeal of the municipal decision and resources available to the municipality and the applicant in the management of potential conflict.

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3. This proposed requirement for municipal support would only apply to companies with total maximum permitted water taking that is greater than 379,000 litres per day. Therefore, for new water taking or increases to existing water taking that reaches this threshold, water bottling companies will not be bound to consult with municipalities to seek council resolution.

The Region of Peel staff is concerned about the cumulative impact of multiple water takings from groundwater sources that are each below the established threshold of 379,000 litres per day and we ask that the municipality is consulted on all applications from a water bottling company for any daily water taking volume. The Region of Peel staff recognizes that this option may be onerous and administratively burdensome to obtain approval through municipal council resolution and recommends that a documented consultation with the host municipality and opportunity to share and review the plans for new or increased water taking be a condition of the application process for takings below the set threshold.

Otherwise, lowering the total maximum permitted daily taking that requires approval through council resolution would alleviate the risk of potential impact on the municipal water supply, and safeguard water quantity and quality for existing and future demands.

Thank you for the opportunity to comment on the Ministry's legislative proposal for municipal support for new or increased bottled water taking. If you have any questions, please contact me at justyna.burkiewicz@peelregion.ca

With Best Regards,



Justyna Burkiewicz
Manager Water and Wastewater Compliance
Public Works
Region of Peel

- C: Anthony Parente, General Manager, Water and Wastewater Divisions (Peel)
Elvis Oliveira, Director, Water Division (Peel)
Giancarlo Cristiano, Advisor, Strategic Planning Policy, Clerk's Division (Peel)
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