



July 31, 2025

Permissions Modernization Team  
Client Services and Permissions Branch  
Ministry of the Environment, Conservation and Parks  
135 St. Clair Avenue West  
Toronto, ON  
M4V 1P5

**Re: Conservation Ontario's comments on "Proposed changes to provide flexibility for water taking activities" (ERO#025-0730).**

Water taking activities in Ontario are governed by the *Ontario Water Resources Act* and associated regulations. Proponents seeking to take over 50,000 litres of water per day from the environment are required to obtain a permit to take water (with limited exceptions). The Ministry of the Environment, Conservation and Parks is proposing regulatory amendments to Ontario Regulation 387/04 (Water Taking and Transfer) to introduce flexibility through a new, streamlined permit to take water (PTTW) application process to apply where a permit was in place that was cancelled, expired, or revoked.

Conservation Ontario is the voice of Ontario's 36 Conservation Authorities (CAs). We offer the following comments further to CA mandatory programs and services, including natural hazard management (e.g., drought and low water response) and drinking water source protection.

**Conservation Ontario supports the government's commitment to protect and responsibly manage water resources, while exploring opportunities to provide flexibility while maintaining oversight.**

- We support the proposal to apply appropriate conditions to the new, streamlined process, including that the proposed water taking is from the same location, source, for the same amount or less, and same purpose as the previously issued PTTW.
- We support the proposal to ensure applications submitted through the streamlined process are reviewed by Ministry staff to ensure compliance with applicable requirements.

Section 7 of Ontario Regulation 387/04 requires a Director who is considering an application for a PTTW to give notice to “any conservation authority within whose area of jurisdiction the proposed water taking is located”.

**Conservation Ontario recommends that the process of notifying all affected municipalities and Conservation Authorities be retained in the proposed streamlined application process.**

- To access the streamlined process, proponents may apply within one year of the cancellation, expiry or revocation of the original PTTW. Notification would provide clarity to impacted municipalities and CAs that the water taking activity is resuming in accordance with the original PTTW.
- Providing notice to local Conservation Authorities supports the delivery of CA mandatory programs and services as enumerated in O. Reg. 686/21, including natural hazard protection, drought and low water response, and drinking water source protection.
- Timely and consistent notification supports effective CA management of potential impacts associated with the water taking and a fulsome understanding of current water quantity stressors within their watershed jurisdiction. For example, CAs may use this information to inform modelling (hydrological, flood, drought) to support the delivery of mandatory programs and services.

Thank you for the opportunity to review and provide comments on “Proposed changes to provide flexibility for water taking activities” (ERO#025-0730). We would be pleased to further discuss these comments at your convenience.

Sincerely,

*Nicholas Fischer*

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c.c. Conservation Authority CAOs/GMs