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July 31, 2025

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

On behalf of Township of Puslinch Council, the following comments are respectfully submitted for consideration with respect to ERO Posting 023-0730.

The Township of Puslinch is reliant on groundwater as its primary drinking water source, and therefore any proposed changes to the regulatory framework surrounding Permits to Take Water (PTTW), are of significant concern to the Township. Council appreciates the opportunity to provide feedback and encourage the Ministry to carefully consider the implications of this proposal on the long-term sustainability and transparency of Ontario's water management systems.

The Township is concerned that any loosening of environmental requirements, even under the scope of streamlining previously approved permits, could result in insufficient safeguards for groundwater. Water taking has long-term implications, especially during periods of drought or groundwater stress. The Ministry must ensure that any amendments do not reduce the rigour of environmental oversight or the ability to mitigate risk.

Further, monitoring wells associated with these operations must remain fully accessible, and their continued operation and reporting should be a requirement of any renewed or transferred permit regardless of if the well are located on the operator's properties or neighbouring properties.

Additionally, while the Township acknowledges that this proposal applies to previously approved PTTWs at the same location, for the same purpose, and at the same or lesser volume, clarification is requested that the proposed streamlining process will not be applied



retroactively. The Township respectfully requests that the change to legislation should only apply to cancelled, expired or revoked permits that occur following the change in legislation.

The Township is concerned that the proposed process removes public consultation and municipal engagement for ownership changes and believes that community members and municipalities must have the opportunity to provide input when there are changes to who is extracting groundwater. Transparency is key to maintaining public trust. Even if no changes are proposed to volume or location, changes in ownership, especially to entities with poor environmental track records, warrant review.

The automatic eligibility for a streamlined permit transfer ignores critical considerations such as the new owner's environmental compliance history and operational practices. Municipalities often have insight into the reputations and past performance of local operators, and their input should be considered in the process.

A new permit process ensures that the new owner understands and accepts their responsibilities, including compliance with monitoring requirements, drought contingency planning, and engagement with the local community. Automatically transferring a permit removes this important check. The existing requirement under Section 34.1(11) of the Ontario Water Resources Act that prohibits permit transfers exists for good reason. Circumventing this requirement risks undermining the integrity of Ontario's water protection framework.

In summary, the Township urges the Ministry to reconsider elements of this proposal that may reduce transparency and local input. A streamlined process may be appropriate in cases where minimal risk is demonstrated, but it must not come at the expense of environmental protection, community trust, or municipal input. Any future changes to water-taking permits, regardless of ownership, should include a robust vetting process, opportunities for public comment, and clear criteria for environmental review.

Council thanks the Ministry for the opportunity to comment and would welcome any further engagement on this matter.

Sincerely,

Justine Brotherston  
Director of Corporate Services/Municipal Clerk



Township of Puslinch