

August 1, 2025

Permissions Modernization Team  
Client Services and Permissions Branch  
135 St. Clair Avenue West, Floor 1  
Toronto, ON, M4V 1P5, Canada

**Re: Proposed changes to provide flexibility for water taking activities (ERO 025-0730)**

Dear Permissions Modernization Team,

Ontario Greenhouse Vegetable Growers (OGVG) support the government's proposed changes to provide flexibility for water taking activities. Water is a fundamental input for greenhouse agriculture. Ensuring continuity and facilitating reapplication for farms in the event of a change in ownership, or lapsed due to an administrative oversight, supports farm businesses. The greenhouse vegetable sector, which has seen 5% annual growth over the last decade, now contributes \$2.4 billion in Gross Domestic Product (GDP) to the Ontario economy. OGVG represents 170 farming families managing over 4,250 acres of tomatoes, peppers, and cucumbers, supporting more than 35,000 jobs through the full value chain across Ontario.

Limiting the streamlined permit process to previous permit approvals from the same location, for the same amount (or less), and for the same purpose as was approved under the previously issued permit reduces duplication, administrative burdens and red tape. Providing short-term permits on the same terms and conditions as expired permits while renewal applications are under consideration further supports greenhouse businesses and is a welcome improvement to the process. We are further pleased to see the government supporting greenhouse agriculture while maintaining strong environmental oversight in the process. While the streamlined process exists within one year of the cancellation, expiry, or revocation of the permit, we would hope to see the extension of this period to up to 3 years for greenhouses and agricultural purposes. The additional time would support transitions in farm ownership during volatile economic conditions while maintaining strong environmental standards.

OGVG members look forward to further streamlined permitting and reduction of red tape. Reducing the administrative burden on greenhouse farms allows operators to focus on delivering fresh, affordable and sustainable fruits and vegetables to Ontarians. We look forward to supporting future streamlining initiatives that support greenhouses across Ontario and are always available to answer any questions and provide further comment.

Sincerely,



Richard Lee  
Executive Director