environmental defence

October 31st, 2025

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

RE: ERO 025-1082 Strada Aggregates Inc. Permit To Take Water

Environmental Defence Canada (EDC) opposes the proposal for an amendment to Strada Aggregates Inc. Permit To Take Water (No. 3210-AKRL9C) for aggregate washing purposes presumingly for the company's newly proposed pit and quarry, which would operate below the water table. EDC requests that the Ministry of Environment, Conservation and Parks (MECP) deny the proposed permit amendments.

The proponent is requesting to take up to 5,000,000 litres of water per day for up to 365 days per year—more than double of what the current Permit To Take Water allows. As is described in the ERO posting, this proposed water taking qualifies as a Category 3 Permit and is anticipated to have the highest potential of causing unacceptable environmental impact or interference. This high potential for environmental harm is reason enough to deny this request.

Water in Ontario already faces a variety of threats including climate change, land development and population growth. On top of this, recent changes to the province's long-standing rules for water use have made it easier for companies to obtain permits without adequate environmental review, public oversight, and Indigenous consultation. The province does not keep a public record of how many companies hold water taking permits and how much water is taken each day. This means the government and the public cannot know the cumulative impacts of various water taking activities.For this reason, it is crucial MECP deny permit requests that have clear environmental impacts, such as Strada's most recent proposal, in order to mitigate the pressure on the province's water systems and prioritize long term water security in the community.

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We thank you for the opportunity to comment on this proposal and ask the Ministry to deny the proposed amendments to Strada's permit to take water, as described in ERO 025-1082.

Sincerely,

Rebecca Kolarich
Program Manager
Environmental Defence Canada