Dufferin county

A community that grows together

October 31, 2025

Hon. Todd McCarthy
Minister of the Environment, Conservation and Parks
777 Bay Street, 5th Floor
Toronto, ON M7A 2J3

Minister McCarthy

Re. Strada Aggregates Inc. Application to the Ministry of Environment, Conservation and Parks for an Amendment to a Permit to Take Water (ERO #: 025-1082)

On behalf of the County of Dufferin, staff are writing this letter to voice our objection to Strada Aggregates Inc.'s application to amended Permit to Take Water No. 3210-AKRL9C, as it is presented today. Dufferin County currently experiences significant issues relating to water supply and, in our opinion, the proposed amendment to the Permit to Take Water will only exacerbate the significant water supply issues present in the County of Dufferin.

The County of Dufferin is of the understanding that Strada Aggregates Inc. plans on using upwards of 5,000,000 litres of water per day for a period of 10-years. This, in our opinion, is highly concerning since this amount of water is larger than the amount of water utilized for each of the eight (8) lower-tier municipalities in Dufferin County. With such a significant amount of water being proposed to be withdrawn by this permit, the potential impacts to the County of Dufferin's water table could be severely detrimental to the systems overall health. If the water system were to be negatively affected, this would likely have serious implications on the quality and quantity of water in Dufferin, a result severely problematic for one of Dufferin County's economic drivers – the agricultural sector.

In Dufferin the agricultural sector represents a significant portion of county's economy and, as such, the protection of agricultural lands is paramount. The County of Dufferin understands that the availability of a safe and abundant water source is critical to farmers production of crops that are not only produced in large quantities but are also of the highest quality. It is our belief that Strada Aggregates Inc. amendment to their Permit to Take Water will harm the Dufferin County farmers ability to produce crops in high yields and maintain the current standard of crops. The permit's large, proposed volume amount of 5,000,000 litres per day will likely lead to a notable decrease in the water table level and, in turn, the availability of water for farmers to use for their crops. A reduction in water availability will have profound impacts on current agricultural practices, adaptability of water system, and, ultimately, crop output for farmers in Dufferin County.

A community that grows together

Beyond the agricultural sector, the County of Dufferin also believes that at a fundamental level the safety and quality of resident drinking water will be brought into question should the amendment to the Permit to Take Water be approved. As noted previously, the proposed volume amount of 5,000,000 litres per day will likely lead to a lower water table, which means that the water system becomes more susceptible to emerging impacts to existing water supply. For one, the availability of groundwater supply is likely to be reduced, and, as a result, the number of drinking water sources for residents will also be diminished. Further to that, there is a heightened potential for large residential areas to be negatively influenced by the emergence of a contaminant in the water system. Given that the Permit to Take Water has the potential to reduce the number of drinking water sources, it is likely that larger numbers of residents will become reliant on a certain water source in Dufferin County. Should this water source become infiltrated by a harmful contaminant, the number of residents now subject to lesser quality drinking water or, in extreme cases, undrinkable water, will be much greater than in a scenario where the Permit to Take Water is not approved and the number of water sources in Dufferin County remains unchanged.

Based on the above, the County of Dufferin wants to once again emphasize our strong objection to Strada Aggregates Inc.'s submission to the Ministry of the Environment, Conservation and Parks for an amendment to a Permit to Take Water. It is our belief that the approval of the amendment to the permit will have detrimental impacts to Dufferin County's water system, ones that would greatly impact residential drinking water and the availability of water to support agricultural production. We will also request to be included on all updates relating to ERO #: 025-1082 and having the associated technical materials available for review through the ERO posting when available.

Respectfully submitted,

Liam Morgan, MCIP, RPP
Acting Planning Manager
Phone: 519-941-2816 Ext. 2511
lmorgan@dufferincounty.ca