Reform Gravel Mining Coalition

March 6, 2026

Minister of the Environment
135 St Clair Ave West
1st Floor
Toronto, ON
enviropermissions@ontario.ca

RE: Permit to Take Water ERO 026-0124 Esbaugh Sand and Gravel

Dear Minister McCarthy,

Reform Gravel Mining Coalition members urge the Minister to deny issuing a permit to take water to Esbaugh Sand and Gravel within the Waterloo Moraine. We endorse the submission made by the Citizens for Safe Groundwater in Wilmot identifying the significant threat this water taking permit poses to a vulnerable aquifer system in the Waterloo Moraine.

As you are aware, the aquifer in the Waterloo Moraine is under intense strain from existing water taken by area municipalities and industry. Data compiled by Citizens for Safe Groundwater in Wilmot near the Esbaugh site identifies a 1.5 metre drop in rural drinking water wells. To enable the cities in Waterloo Region to protect the water security of existing residents and businesses, the existing freeze on development applications in Waterloo Region must be extended to include all commercial/industrial water taking permits.

Aggregate operations around the world manage to clean aggregate with limited water resources. There are available waterless technologies to clean aggregate rather than utilizing settling ponds that impact local groundwater systems.

Throughout Ontario we urge the province to require cumulative impact assessments of groundwater systems before issuing or extending water taking permits. A cumulative assessment provides data to measure the impact of multiple users on natural water systems in order to sustainably manage groundwater systems.

Thank you for your attention to this vitally important matter.

Reform Gravel Mining Coalition
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cc. Mike Harris, Minister of Natural Resources
Heather Malcolmson, Director, Ministry of the Environment, Permissions branch