ERO 026- 0124 Submission Regarding Proposed Category 3 Permit to Take Water **timeline March 6 2026**

Permit Type: New Category 3 – Aggregate Washing & Dust Suppression

This proposal seeks to withdraw up to 9,720,000 litres per day, for up to 230 days per year, for a period of 10 years, for industrial aggregate washing and dust suppression. This equates to more than 2.2 billion litres annually, potentially exceeding 22 billion litres over the life of the permit. The permit has been classified as Category 3, meaning it carries the highest potential risk of causing unacceptable environmental impact or interference. Climate Action Newmarket Aurora has the following concerns:

Summary of Concerns

The Hallman Pit site lies within a highly sensitive groundwater recharge area that supports private wells, municipal drinking water systems, and local wetlands in surrounding communities, including Kitchener, Waterloo, and Cambridge. Because the pit sits atop permeable sand and gravel deposits, the aquifer is particularly responsive to changes in water levels. Large, sustained industrial withdrawals from this location could alter groundwater flow, reduce aquifer recharge, and affect connected ecosystems, climate resilience and water users.

Volume, Duration and Cumulative Climate Impacts

Sustained withdrawals at this scale can lower groundwater tables, reduce wetland water levels, affect private wells, and alter aquatic systems. The 10-year duration compounds the risk, especially under climate variability and drought conditions.

Ontario's climate projections indicate increased variability in precipitation and longer dry periods. Withdrawals during March–December overlap with seasonally low groundwater recharge, heightening the potential for stress on the environment and local water users.

High-volume water withdrawals from Hallman Pit carry implications beyond immediate water availability. Wetlands, ponds, and the groundwater systems connected to the pit act as natural carbon sinks, storing carbon in soils, sediments, and vegetation. Lowering water levels through sustained industrial extraction can expose previously waterlogged soils to oxygen, accelerating microbial decomposition and releasing stored carbon dioxide and methane into the atmosphere. This reduces the overall carbon storage capacity of the ecosystem.

Vegetation along wetland margins is also highly sensitive to water fluctuations; stress or dieback diminishes plant growth and organic litter deposition, further limiting carbon sequestration over time. These effects are amplified by seasonal timing, as industrial withdrawals peak during spring, summer, and fall. That is the same period when natural recharge is lowest and temperatures are highest.

The broader consequence is what is called a feedback loop: reduced carbon storage contributes to higher atmospheric greenhouse gas concentrations, which can worsen local temperature extremes and drought conditions, placing additional stress on water systems, wildlife, and communities. Even with water recirculation, losses to evaporation and dust suppression mean the pond must supply millions of litres daily, maintaining pressure on the hydrological system and connected wetlands. Considering this, the high-risk industrial water takings do not just pose a local environmental concern, they directly intersect with climate resilience and carbon management objectives on a wider scale. Protecting water levels and connected ecosystems is therefore a key component of broader climate mitigation strategies, and must be considered in any long-term permit approval.

Significance and Public Concern

While this proposal may appear to take water from “just a pond,” it is understood that the scale of withdrawal is massive for any taking, let alone for a non-essential service of industrial washing and dust control. The pond is hydrologically connected to the local groundwater and nearby wetlands, meaning water levels in the wider area would be affected. Seasonal timing, long-term duration, and cumulative effects are critical: even temporary drawdowns can stress private wells, wildlife, and aquatic habitats. Many people may not realize that this water is for non-essential use, and that losses through dust suppression, evaporation, and sediment removal mean the pond must supply continuous, high volumes. The Category 3 designation signals the highest risk of environmental impact, yet the public rarely sees how interconnected the system is, or how closely the monitoring will be required to prevent harm.

Recommendations

Consistent with regulations for a category 3 permit to take water, and to ensure that the proposed water taking does not cause harm to public water supplies, ecosystems, or climate-related carbon storage, Climate Action Newmarket Aurora strongly advocates for:

1. A comprehensive understanding of the water source to determine recharge rates, seasonal variability, and connected aquifers.

2. A cumulative impact assessment through the evaluation of all existing and planned water takings in the watershed.

3. Climate-adjusted low-water scenario modelling to prevent effects under drought or low-precipitation conditions.

4. Safeguards to protect freshwater supplies and carbon sinks through withdrawal limits and a plan if water levels drop beyond safe thresholds

5. Mandated independent monitoring and reporting of water levels, ecological impacts, and compliance with permit limits with potential for ongoing reviews

Sources

1. Ontario Ministry of the Environment, Conservation and Parks (MECP) – *Permit to Take Water Manual* (2016, updated guidance).

2. Ontario Water Resources Act, R.S.O. 1990, c. O.40.

3. Ontario Low Water Response Program Guide – MECP.

4. Government of Ontario – Climate Change Impact Assessment (2023).

5. The Environmental Commissioner of Ontario reports on groundwater protection and cumulative impacts under the PTTW system.

6. Conservation Authorities Act, R.S.O. 1990.

7. Walkerton Inquiry Report (Part II) – Justice O'Connor.