environmental defence

March 6, 2026

Client Services and Permissions Branch
135 St. Clair Avenue West, 1st Floor
Toronto, ON
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RE: ERO 026-0124 Esbaugh Sand & Gravel LTD Permit to Take Water

Environmental Defence Canada (EDC) opposes Esbaugh Sand & Gravel LTD's proposal for a new Permit to Take Water (PTTW) for aggregate washing purposes in Wilmot Township. It is appalling that large industrial water users are still seeking new water taking permits in the Region of Waterloo despite the ongoing and significant water quantity crisis.

The Ministry of Environment, Conservation and Parks (MECP) must deny this application and immediately put a moratorium on all new or expanded industrial and commercial water-taking permits in the region. Waterloo region relies on a complex system of 100 wells, and the Grand River, for drinking water to supply all seven of its municipalities. The province has a responsibility to protect freshwater, and until a plan of action is established and effectively executed, it needs to put a pause on non-essential water-taking.

This water crisis in Waterloo Region is partly the result of numerous, deleterious provincial policy changes. From fast-tracking sprawl development to blindly approving over 100 water-taking permits over the last five years in Waterloo region, the provincial government has failed to protect residents' freshwater security, leaving the region to pick up the pieces.

Safeguarding groundwater in Ontario

Approximately three million people in Ontario get their drinking water from private or municipal wells. Groundwater is a vital source of water supply for many communities and also provides critical baseflow to streams, lakes and aquatic ecosystems. However, Ontario lacks a comprehensive understanding of water permitting and usage patterns, due to gaps in policies specifically focused on groundwater use in Ontario. There is a need for improved internal consistency

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within MECP's datasets as well as direct and transparent linkages between water permits and reported usage. This would support more accurate assessments of water use and compliance as well as evidence-based decision making in groundwater policy and management, which is especially important in groundwater dependent regions. A historical review of PTTW data from 1960 to 2022 reveals a growing reliance on groundwater, particularly in Southern Ontario.[1]

These considerations together, underline the need for greater awareness and more sustainable groundwater management starting at the provincial level. This could include strengthening groundwater data and policy collaborations with other levels of government, Indigenous communities, and academic researchers, and refining the PTTW process to prioritize community water use and enhance transparency. It's critical that these sources are prioritized for residential water supply, agriculture and ecosystems, rather than industrial or commercial use.

EDC requests that MECP deny Esbaugh Sand & Gravel LTD's application for a new PTTW under ERO 026-0124 and block any new or expanded commercial or industrial water taking permits until a plan of action is established and executed in the region.

Thank you for the opportunity to comment on this proposal.

Sincerely,



Ashley Wallis
Associate Director
Environmental Defence Canada

[1] Sima Saadi, Carolyn Johns & Diana Paredes (04 Dec 2025): Groundwater permits in Ontario: an analysis of open data, Canadian Water Resources Journal / Revue canadienne des ressources hydriques, DOI: 10.1080/07011784.2025.2584825