Client Services and Permissions Branch
MECP
On-line submission and PDF via email to
enviropermissions@ontario.ca

March 6, 2026

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

The Ontario Headwaters Institute, a registered charity that promotes watershed security - healthy and resilient watersheds that protect regional ecological integrity, social wellbeing, and economic vitality – urges the Ministry to defer approval of this permit application for the foreseeable future. at this time due to significant regional uncertainties.

As you are aware, the Ontario Water Resources Act mandates the conservation, protection, and sustainable management of our waters. While water-taking permits support essential services, the current situation in the vicinity of this proposed use appears to exacerbate existing threats and may trigger unknown potentially negative future impacts.

Our concerns include that:

1. This application flies in the face of the current water shortage and its resulting moratorium on new development in Waterloo due to a regional water shortage;
2. The application is for water in close proximity to existing municipal wells, with potentially serious constraints on those wells;
3. The allocation of so much water in this permit may impact water needed for the proposed 700-acre land assembly converting what is now mostly farmland into an unknown industrial application, with potentially massive water needs; and,
4. There appears to be no cumulative assessment for either long-term water availability in the Region, nor the protection of its long-term supply, such as by protecting the Paris-Galt Moraine.

In short, approving this request at this time would be against the fundamental obligations of the Ontario Water Resources Act and would constitute an irresponsible action in the current circumstances.

Sincerely,

Andrew McCammon
Executive Director

Water is Life.
Let's act like it

The OHI Promotes Watershed Security in Ontario: Water for People and for Nature
www.ontarioheadwaters.ca 416 231 9484 andrew@ontarioheadwaters.ca