ERO 026- 0124 Submission Regarding Proposed Category 3 Permit to Take Water
03/06/26

I am writing regarding this proposed Category 3 Permit to Take Water. A Category 3 designation represents the highest level of environmental risk under Ontario's permitting system. This proposal seeks to withdraw up to 9,720,000 litres per day, for up to 230 days a year, over a 10-year period; more than 2.2 billion litres annually, and potentially over 22 billion litres in total, for aggregate washing and dust suppression.

My primary concern is that this level of extraction places sustained pressure on a highly sensitive groundwater recharge area at a time when climate uncertainty is increasing. The Hallman Pit sits atop permeable sand and gravel deposits that feed an aquifer supporting private wells, municipal drinking water, and wetlands serving communities such as Kitchener, Waterloo, and Cambridge. My understanding is that water moves easily through this system which means impacts can move easily too.

A decade of high-volume withdrawals during months when recharge is typically lowest raises serious questions. Ontario is already experiencing greater precipitation variability and longer dry periods. In that context, groundwater resilience is foundational to community and ecosystem stability. Even gradual drawdowns, when repeated year after year, can lower water tables, stress wetlands, and affect private wells.

There is also a climate dimension to factor in. Wetlands and groundwater systems store carbon in saturated soils. When water levels decline, stored carbon can be released as carbon dioxide and methane, weakening the land's natural ability to buffer climate change. Reduced vegetation along wetland margins further diminishes long-term carbon storage. This creates a troubling cycle: less stored carbon contributes to warming and drought stress, which further strains water systems. Approving large-scale industrial water takings in this context would negate climate resilience goals.

While I am not a hydrogeologist or climate scientist, it seems clear that future mass takings of fresh water must be carefully scrutinized, especially Category 3 permits. We must ensure that our groundwater systems remain intact and resilient for generations to come.

This permit should be reviewed and amended in both its size and need for water taking. It should include: comprehensive hydrogeological analysis of recharge rates and aquifer connections; a full cumulative impact assessment of all water takings in the watershed; and climate-adjusted drought modelling. Any revised permit should include: clear withdrawal limits and automatic triggers to reduce or halt pumping during low-water conditions must be established; mandatory independent, transparent monitoring and regular public reporting; and the permit subject to ongoing review rather than a fixed 10-year approval. I respectfully urge that this proposal be evaluated with precaution, transparency, and long-term responsibility at the forefront.

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.