

ONTARIO FEDERATION OF ANGLERS & HUNTERS



Ontario Conservation Centre

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OFAH FILE: 333A/794
January 10, 2017

Mr. Patrick Spezowka, Supervisor
Ministry of Environment and Climate Change
Operations Division
Southwestern Regional Office
733 Exeter Road
London, Ontario
N6E 1L3

Dear Mr. Spezowka:

Subject: EBR Registry Number 012-9151: Bottled Water Technical Guidance Document

The Ontario Federation of Anglers and Hunters (OFAH) is Ontario's largest, non-profit, conservation-based organization, representing 100,000 members, subscribers and supporters, and 740 member clubs. Our organization is heavily invested in the conservation of Ontario's groundwater resources, which provide irreplaceable habitat for stream-dwelling cold- and cool-water fish species such as Brook Trout and Atlantic Salmon. As such, the OFAH is highly supportive of the direction to enhance water security in Ontario through a moratorium on the expansion of existing water takings or new Permits to Take Water (PTTW) for the purpose of bottling for commercial sale. This will provide the Ministry of Environment and Climate Change (MOECC) an opportunity to strengthen its policies and regulations related to manufacturers using groundwater to produce bottled water. Additionally, we are supportive of the more stringent procedural and technical requirements contained within this document, particularly related to the monitoring and reporting sections.

Requiring permit holders to make weekly water-taking reports publicly on a website is an excellent step in improving the accountability of companies that utilize a public resource for profit. We do, however, caution that despite an increase in required reporting, there is a remaining (and quite possibly increased) need for provincial oversight and auditing to ensure that the information posted is accurate and being provided in an accessible format.

The OFAH recommends that the elements of the application process that deal with cumulative impacts to groundwater resources are considered on a broad-enough scale as to encompass the watershed in question rather than just the immediate vicinity. In addition to considering the current state of the pressures on groundwater resources, it will be imperative to conservatively account for an increase in water demand due to future population growth, a reduction in groundwater recharge rates through urbanization and finally, future uncertainties related to climate change.

Regarding the prioritization of water-taking uses, drinking water and ecological function (i.e. surface flow levels that support the ecological requirements of resident fish species) should far outweigh a manufacturers' need for water supply.

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Overall, the OFAH is very supportive of this document and the proposed moratorium. We are appreciative of the opportunity to provide comments and are interested in providing feedback on future regulation proposals related to PTTWs in Ontario.

Yours in Conservation,

A handwritten signature in black ink, appearing to read 'Tom Brooke', with a stylized flourish at the end.

Tom Brooke
Fisheries Biologist

TB/gh

cc: OFAH Fisheries Advisory Committee
Angelo Lombardo, OFAH Executive Director
Matt DeMille, OFAH Manager, Fish & Wildlife Services
OFAH Fish & Wildlife Staff