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INSPIRING CHANGE

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BY Email: moecc.waterpolicy@ontario.ca

Leo Luong
Manager
Ministry of the Environment and Climate Change
Climate Change and Environmental Policy Division
Land and Water Policy Branch
135 St. Clair Avenue West
Floor 6
Toronto, Ontario
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Re: A regulation establishing a moratorium on the issuance of new or increasing permits to take water for water bottling (EBR Registry Number: 012-8783)

Dear Mr. Luong,

We the undersigned are pleased to provide comments on Ontario's proposed regulation to establish a moratorium on the issuance of new or increasing permits to take water for water bottling ("A regulation establishing a moratorium on the issuance of new or increasing permits to take water for water bottling", EBR Registry Number: 012-8783).

Thank you for taking the first step toward protecting Ontario's groundwater, and for putting the needs of communities before the profits of water bottlers. We support the proposed two year moratorium on the issuance of new or increasing permits to take water for water bottling, and are encouraged by the proposal's stated purpose:

This would allow time for the Ministry [of Environment and Climate Change] to undertake a comprehensive look at our current understanding of Ontario's groundwater resources and the rules that govern water bottling facilities that take groundwater.

We urge the Ministry of Environment and Climate Change to ensure this process yields:

1. A thorough and comprehensive understanding of the hydrogeology of surface and groundwater resources throughout the province, that anticipates future demand from increasing population growth and the impacts of climate change;
2. A science-based, precautionary approach to approving water-taking permits where community, agricultural and ecosystem needs are prioritized over water bottlers;

3. Full cost recovery through the water charges scheme, to ensure the costs paid for water taking permits balance the administrative costs associated with managing permits, robust monitoring programs, and the risks to the environment they pose;
4. Strong government oversight to ensure appropriate monitoring and timely responses to conditions that could negatively impact groundwater levels. Raw monitoring data and scientific analysis should be available to the public and to third party peer review and analysis; and
5. A deposit return program for plastic bottles, to address Ontario's abysmal 50 per cent collection rate and the growing problem of plastic pollution in the Great Lakes.

As the Ontario government has acknowledged, water bottling is a unique, consumptive industry. Beyond impacts on provincial water quantity, and related changes to base flow, Ontario needs to address the plastic pollution problems associated with this industry. Each year, an estimated one billion bottles end up in landfill or littered in the environment.

Ontario has the lowest polyethylene terephthalate (PET) bottle collection rate of any province—capturing only 50 per cent of the plastic bottles purchased in the province. It is no coincidence that Ontario is one of only two Canadian provinces without a deposit return program for plastic bottles; other provinces recycle 72 to 95 per cent of their bottles¹.

Ontario needs to put a price on plastic, as almost every other province has done with a deposit return program. With a deposit return program, Ontario could recover recyclable materials, and keep plastic out of landfills and the environment. Moreover funds from the program could go towards environmental efforts that protect waterways, and address water quality issues, as they do in New Brunswick and Michigan.

It's time to comprehensively address the problems with bottled water in Ontario, by fixing the permitting system for water bottlers, and by putting a price on plastic pollution through a deposit return program.

Thank you for the opportunity to provide these comments meant to support Ontario's proposal to put a two year moratorium on new or increasing water bottling operations, and encourage further action to safeguard Ontario's freshwater.

If desired, we are willing to meet to discuss our submission with you.

¹ <http://www.cmconsultinginc.com/2014/07/newly-released-pays-2014/>

Sincerely,



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Tim Gray, Executive Director
Environmental Defence



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Linda Heron, Chair
Ontario Rivers Alliance

Ontario
Headwaters



Andrew McCammon, Executive Director
The Ontario Headwaters Institute