

November 30, 2016

Mr. Leo Luong  
Manager  
Ministry of Environment and Climate Change  
Environmental Policy Division  
Land and Water Policy Branch  
40 St. Clair Avenue West, 10<sup>th</sup> Floor  
Toronto, Ontario  
M4V 1M2

*Delivered via Facsimile*

Dear Mr. Luong:

**Re: A regulation establishing a moratorium on the issuance of new or increasing permits to take water for bottling; EBR Registry No. 012- 8783**

The Canadian Environmental Law Association (CELA) strongly supports the Ministry's proposed regulation to establish a moratorium for new or increasing permits to take water (PTTW) for water bottling.

The Ministry has indicated that it will undertake a comprehensive review of its management of groundwater resources while the moratorium is in place. We were pleased to see that one of the actions planned during the moratorium is to examine water pricing and other tools that could be used to further protect and conserve water. CELA has consistently advocated water-taking charges to help finance data collection, monitoring, planning and implementation of source protection on a watershed basis. Ontario currently only charges companies \$3.71 for every million litres of water. The Environmental Commissioner of Ontario's 2007/2008 Annual Report stated that Ontario's water is undervalued and that the low fee will "help cover only a small portion of the costs of the province's needed water management programs" and would do "nothing to encourage water conservation or efficient use of Ontario's waters." As part of its review, we would urge the Ministry to charge water takers an appropriate fee to ensure the long term sustainability of Ontario's water.

We look forward to continued involvement with the Ministry on this important issue.

Yours truly,

**CANADIAN ENVIRONMENTAL LAW ASSOCIATION**



Ramani Nadarajah  
Counsel

**Canadian Environmental Law Association**

T 416 960-2284 • F 416 960-9392 • 130 Spadina Avenue, Suite 301 Toronto, Ontario M5V 2L4 • [cela.ca](http://cela.ca)