



Ontario Ground Water Association

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1952 - 53 Wilfred Field
1953 - 54 Frank Hammond
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1958 - 59 Ellis McLaughlin
1959 - 61 Norm Faulkner
1962 - 63 Clayton Shantz
1963 - 64 Doug McLean
1965 - 66 Bill Dale
1966 - 67 Carol Rutledge
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1968 - 69 Fred Johnston
1969 - 70 Bill Wilson
1970 - 71 Ken Hart
1971 - 72 Ralph Snider
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1976 - 77 Doug Davidson
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1988 - 89 Clarke Watson
1990 - 91 Theo Gerrits
1992 - 93 Jim Rennison
1994 - 95 Herb Lang
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2003 - 05 Allan Wright
2005 - 07 Kevin Constable
2007 - 09 K.C. Craig Stainton
2009 - 12 Greg Bullock
2012 - 14 David Gunn
2014 - 17 Darren Juneau
2017 - 19 Bryan Watson

Leo Luong
Manager, Water Policy Section
Environmental Policy Branch
Foster Building 10th Floor
40 St Clair Ave W
Toronto, ON
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Re: Proposal for Updating Ontario's Water Quantity Management Framework

Dear Mr. Luong,

The Ontario Ground Water Association (OGWA) represents front line groundwater professionals in Ontario and those companies that support the industry and have chosen to join our cause in "protecting and promoting Ontario's most precious resource". The OGWA is a not-for-profit representing over 845 properly licenced and insured well drillers and pump installers in the Province of Ontario. The OGWA is an affiliate of the National Ground Water Association in the USA as well as a founding supporter of the Canadian National Ground Water Association.

The OGWA supports the Ministry's initiative to Update Ontario's Water Quantity Management Framework. The OGWA however counsels the MECP that what the water is declared to be used for and how the water is actually used is intrinsically important in an equation ending with the sum quantity taken. As we proceed into the future and the effects of Climate Change unfold before us; fresh, truly fresh, water from our aquifers will become more and more valuable.

Whereas this may not be the time for such a major debate the OGWA believes the time is coming where the debate will be impossible to avoid. Increasingly definitions of uses and actual uses are blurred. How can we reconcile water fresh from a groundwater well in the "Proposed Action" labelled as "Highest Priority Use" – *Drinking Water* (livestock watering) – being actually used to flush gutters of refuse in a barn? How can we reconcile water used for "Agricultural Irrigation" applied at different times and wind conditions having totally different effects on soil moisture content, depending on the how and the when? How does one assess value to these uses vs human consumption? Sorting uses will be complex undertaking but very important.

It is the belief of the OGWA that to allow a considered, balanced Quantity Management Framework priorities must be set and oversimplified labelling in massive subject areas need to be edited. Education will be a key component in establishing the priorities and changes to ultimately conserve our fresh water. Regulating new construction and provide incentives to retrofit existing situations is a consideration.

Municipal drinking water supply is proposed as a highest priority use as it should be. Current, planned growth, longer-term growth are all equal priorities when we consider

"Dedicated to protecting and promoting Ontario's most precious resource."

the future strength of Ontario. Why however would we consider that the same water provided for drinking (human consumption) be used for flushing toilets? Some simple changes during new construction (and incentives for retrofits) could have “grey water” systems evolve into appropriate sources of water for toilet flushing. Similarly, in the previously mentioned scenario of the barn, livestock drinking water is a priority as is milking equipment wash water, whereas gutter flushing etc., should be reserved for recycled water. Education, identification, and incentives for retrofits an apt solution.

The OGWA supports modernization of the approach to managing water takings in all areas. Stressed areas immediately with a view to all areas as the model is perfected. Incentives for conservation and innovative methods of recycling water resources are suggested. An emphasis on reporting rather than permitting for categories such as agriculture who are exempt, but taking information is important to know. In all cases, equity and transparency must be the top considerations in the engagement of water users, stakeholders, and Indigenous communities. If a “level playing field” is maintained people will remain engaged and be willing to cooperate with reporting.

Education is the best way that the province can help users be prepared for drought. The province needs to also revisit the subject of “farm drainage”. Systematic farm drainage (often subsidized) has robbed the shallow aquifers of water meant for them by nature. The shallow aquifers no longer provide storage as water no longer gets to the place it was meant to be by nature. Furthermore, this fast flow out of the fields adds to flooding down stream. The water arrives earlier in larger volumes than nature has intended and is not available for use during drought conditions. Development provides similar effects on groundwater storage and off flow.

The OGWA supports making water taking data more accessible. As stated earlier the OGWA believes equity and transparency to be top considerations in engagement. The province’s “Map of Water Well Records” is widely used and appreciated by OGWA members. Expanded to include overlays of water taking permits & vulnerable areas it would help the groundwater industry assess the realities they encounter in the field providing additional information where aquifers may become stressed.

The OGWA supports host municipalities having more input into all water taking decisions involving heavy consumers and especially consumers where the water is incorporated into a product removed from the watershed.

On behalf of the OGWA members & Board of Directors I thank the MECP for the opportunity to comment via ERO# 019-1340. I remain at your service for any additional clarifications or information.

Respectfully,



Executive Director, OGWA

Cc: OGWA Bd. of Directors