

Laura Bowman

1910-777 Bay Street, PO Box 106
Toronto, Ontario M5G 2C8
Tel: 416-368-7533 ext. 522
Fax: 416-363-2746
Email: lbowman@ecojustice.ca
File No.: 840

November 10, 2020

Brent Taylor
Water Policy
Ministry of the Environment, Conservation and Parks
waterpolicy@ontario.ca

Dear Mr. Taylor,

Re: ERO 019-2422 – Bill 213

Ecojustice is a national environmental law organization with offices across Canada. For more than 25 years we have gone to court to protect wilderness and wildlife, challenge industrial projects, and keep harmful chemicals out of the air, water, and ecosystems we all depend on. We represent community groups, non-profits, Indigenous communities and individual Canadians in the frontlines of the fight for environmental justice. This submission is made on behalf of Ecojustice and not on behalf of any client organization.

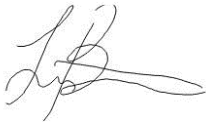
Thank you for providing additional consultation opportunities on this proposal and for consulting on the specific legislative language in Bill 213, as we requested.

We continue to disagree with the use of the 379,000 litre per day threshold for municipal support under the proposed amendment to s.34.01 of the *Ontario Water Resources Act*. We request that subsection 34.01(2) be removed from the Bill so that the threshold for municipal support would be the 50,000 lpd threshold for all permits to take water.

We are disappointed that our recommendations (set out in our August 2, 2020 letter) to take an integrated watershed management approach, and to clarify the prioritization of municipal drinking water and environmental flows over water bottling were not considered.

We ask that further consultations be conducted on the prioritization issue. This new posting provides no additional clarity regarding how water uses would be prioritized under the new scheme. Specific regulatory language should be consulted on so that it is clearly understood what the prioritization will be and how the referenced terms are defined.

Sincerely,

A handwritten signature in black ink, appearing to read 'LB', with a long horizontal flourish extending to the right.

Laura Bowman
Staff Lawyer