

February 5, 2021

Brent Taylor
Ministry of the Environment, Conservation and Parks
Environmental Policy Division
5th Flr, 438 University Ave
Toronto, ON M7A 1N3

Sent by email: waterpolicy@ontario.ca

Dear Mr. Taylor,

Re: EBR Posting 019-2017 - Proposed Implementation of Updates to Ontario's Water Quantity Management Framework

Ontario Pork is the voice of the province's 1,143 pork farmers, and a leader in the agriculture industry. Led by producers, Ontario Pork is committed to sustainable growth in the pork sector, delivering government representation, research investment, and industry improvements in areas including animal care and environmental sustainability, while growing the brand and reputation of producers and their product. Ontario's pork sector represents a significant part of the Canadian economy, combining - from "farm to fork" - \$1 billion in GDP, over 15,300 full time jobs and over \$2.7 million in economic output.

Identifying livestock watering as a Priority 1 use recognizes and supports the importance of food production. Ontario Pork strongly believes that food production must continue to be recognized as a fundamental priority in any decisions made regarding competing water demands. Water use by pork producers and other livestock farmers is a key part of the self-sustaining nature of livestock agriculture with organic waste from animals applied as nutrients to a managed crop rotation, supporting plant growth and naturally recycling large volumes of water within individual farms' ecosystems.

Concerns and Recommendations

As the Ministry considers geographic based Water Taking Management Strategies, Ontario Pork is concerned that producers could be negatively impacted by certain policies that restrict water use for an identified Priority 1 use. We also believe that it should be recognized that not all water taking for "municipal systems" is for Drinking Water. In some situations a significant percentage of the water taking for municipal systems could be Priority 3 uses (Industrial and Commercial). This should be recognized when developing Area Based Water Taking Management Strategies.

While livestock use is currently exempt from Permit to Take Water (PTTW) requirements, a position that we continue to support, in the event that PTTWs for livestock operations become required in water "stressed areas", there may be a requirement to identify private livestock farm well locations and to provide data from private well volumes.

Ontario Pork has been made aware that through the government's open access data, the Ministry already publicly releases information including the permit holder's name, location and the permitted amount of water allowed to be taken. It is our belief that the information currently posted by the

Ministry jeopardizes Ontario's food security and food safety, as anyone can see and potentially tamper with the water source (tap/line) for farms.

We are supportive of the use of water taking information for water management and scientific purposes, but believes it has no basis for broad public release of information that allows identification of individual agricultural permits. We are also supportive of aggregated data being available for use to assist with water management. We suggest the Ministry investigate the use of aggregated data that eliminates the identification of any specific agricultural PTTW.

Ontario Pork requests an opportunity to participate and comment during the Preliminary Assessment Stage and throughout the development of Area Based Water Taking Management Strategies.

Thank you for the opportunity to provide comments on this consultation.

Sincerely,

Eric Schwindt
Board Chair