



Leo Luong
Manager, Water Policy
Ministry of the Environment and Climate Change
Climate Change and Environmental Policy Division
Land and Water Policy Branch
Email: moecc.waterpolicy@ontario.ca

March 7, 2017

RE: EBR Registry Number: 012-9574 A regulation establishing a new water bottling charge

The Ontario Council of the Canadian Federation of University Women (CFUW Ontario Council) is pleased to respond to EBR 012-9574 – a Regulation establishing a new water bottling charge.

CFUW Ontario Council strongly supports Ontario's plan to raise the extraction fee for water bottling to \$503.51 per million litres.

The extraction of groundwater for the bottled water industry is taken from one watershed and instead of being returned to the same watershed after use, is usually transported elsewhere out of the original watershed for provincial, federal or even international distribution. Thus it actually enables a de-facto Intra-Basin Transfer of water.

While the new fee (which only amounts to a cost of \$.005 per litre of bottle water for the industry) will not likely discourage bottling companies to take less water, it will provide extra funds needed to help Ontario recover more of the costs of managing and monitoring affected groundwater resources and monitoring compliance by the bottling industry.

CFUW Ontario Council would also recommend that a large portion of the money collected from the increased fees be allocated to Conservation Authorities across Ontario. They have the best understanding of the local conditions that could be impacted by ongoing, expanded or new water takings by water bottlers. Their staffs have spent the past 10 years in partnership with Drinking Water Source Protection Committees developing Water Budgets for their regions, studying the quality and quantity of water supplies and working toward a better understanding and more accurate mapping of Ontario's groundwater resources. And they have amassed a large bank of collected data which can be used efficiently to help evaluate any PTTW (Permit to Take Water) applications.

CFUW Ontario Council further recommends that this new increased fee for water-taking be extended to other companies who extract large quantities of water for juice, pop and other similar beverages – where the water which is extracted is not returned to the watershed, and the finished product is transported out of the watershed for sale.

CFUW ONTARIO COUNCIL

Ontario Council of the Canadian Federation of University Women (CFUW) is a voluntary, self-funded, non-profit organization with 54 clubs across the province, which is affiliated with the national CFUW and Graduate Women International.

Our mandate is to promote education and life-long learning, to encourage the participation of members in their communities and to enhance the status of women and girls.

Our main concerns include high quality public education, universal health care, a clean safe environment, the economic security of women as well as the prevention of violence against women.

Respectfully submitted



Sandra Thomson
President, CFUW Ontario Council
president@cfuwontcouncil.ca
president.cfuwontario@gmail.com
www.cfuwontcouncil.ca

Prepared by Carolyn Day, Environment Policy Advisor, CFUW Ontario Council

CFUW Ontario Council

EBR Registry Number: 012-9574 A regulation establishing a new water bottling charge
www.cfuwontcouncil.ca | info@cfuwontcouncil.ca