









November 20, 2009



















The Hon. Donna H. Cansfield, Minister of Natural Resources Whitney Block 6th Flr Rm 6630 99 Wellesley St W Toronto ON M7A1W3

**Re: Water efficiency in MNR policies** 

Dear Hon. Donna H. Cansfield,

We are writing to encourage you and your ministry to support the Ministry of Environment's provincial water conservation and efficiency strategy, as part of *Safeguarding and Sustaining Ontario's Water Resources for Future Generations*. A strong water conservation and efficiency strategy has the potential to enhance water security, improve ability of Ontarians to adapt to the impacts of climate change, and secure Ontario's leadership role in the international green economy.

The interconnectedness of water and energy means that a significant amount of energy is required to extract, treat, heat and distribute water, as well as to collect and treat the resulting wastewater. A study by the POLIS Project, *Greenhouse Gas and Energy Co-benefits of Water Conservation*, demonstrates that the energy required for water pumping and treatment is a significant proportion of municipal energy use. For example, the City of Toronto, the Region of Peel and the City of Guelph identified water and wastewater management as accounting for 25-60% of their municipal energy use. Accordingly, a strong water conservation and efficiency strategy in the province will not only save water, but will also contribute significantly to the province's energy conservation, energy planning goals and greenhouse gas reduction strategies.

Our coalition of 16 groups of water professionals, university think-tanks, and environmental and citizen-based groups support the 25 actions outlined in  $H_2Ontario$ : A Blueprint for a Comprehensive Water Conservation and Efficiency Strategy. We encourage the Ministry of Natural Resources to consider the many opportunities for water conservation and efficiency to conserve energy, save Ontarians money, contribute to a more sustainable environment and create healthier communities.

In terms of incorporating water efficiency into MNR policy, we urge you to support the following key opportunities:

- Establish, and make publicly available, a database of water withdrawals
- Initiate studies on ecological needs for water in high use watersheds
- Support R&D for conservation and innovative use of non-potable water sources (rather than require all water to be treated as if it is drinking water regardless of use)

In addition, we encourage you and your Ministry to support other key opportunities in your colleagues' portfolios, such as:

- Updating the Ontario Building Code to reflect best available water efficient technologies
- Requiring water conservation plans for specified land use planning decisions
- Mandating conservation plans for water taking permit holders and municipalities
- Making funding grants issued by MEI, MMAH and other provincial ministries and agencies contingent on water conservation initiatives
- Acknowledging water conservation as the most economical form of new water infrastructure, and providing funding for water conservation initiatives accordingly
- Including water efficiency as an aspect of all energy efficiency programs, policies & projects where applicable
- Enacting water efficiency standards under the new powers provided in the Green Energy Act, including a water efficiency labelling program
- Supporting community energy planning inclusive of district energy, water use and supply, transit and transportation

We would like to request a meeting with you in the next couple of weeks to discuss how the Ministry of Natural Resources can develop and support policies that contribute to Ontario's new water conservation and efficiency strategy. Please feel free to contact me at 416-960-2284 ext. 219 or by email at <a href="mailto:theresa@cela.ca">theresa@cela.ca</a> to arrange a meeting. Thank you for your time and consideration.

Sincerely,

CELA publication 692

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Canadian Environmental Law Association

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Encl.: 2

c.c. Sarah Baker, Chief of Staff