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Great Lakes United



Union St-Laurent Grands Lacs



February 5, 2010



The Hon. Linda Jeffrey
Minister of Natural Resources
Whitney Block
6th Flr Rm 6630
99 Wellesley St W
Toronto ON M7A1W3



Re: Water efficiency in MNR policies



Dear Ms. Jeffrey,



Congratulations on your new appointment as Minister of Natural Resources. In December we met with Daniel Ben-Aron, Special Assistant (Policy) and Richard Linley, Special Assistant (Outreach) to the previous Minister of Natural Resources, the Honourable Donna Cansfield, to encourage 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*. We would like to arrange a meeting with your current policy advisor, and yourself, to discuss the same at your earliest convenience.



A strong water conservation and efficiency strategy has the potential to enhance water security, improve the 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 *H₂Ontario: 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 conservation into MNR policy, we urge you to support the following key opportunities:

- **Provide leadership in water conservation by:**
 - **upholding the ecological definition of watershed for new or expanding Intra-Basin Transfers**
 - **develop rigorous conservation criteria well in advance of considering any and all applications for Intra-Basin Transfers**
 - **in partnership with the Ministry of the Environment, educate water takers about the myriad cost and ecological benefits of water conservation**
- **Impose a timeline for finalizing the Water Resources Information Program database, and consolidate Permit to Take Water information on the actual water use of various sectors and water users to create an accurate, publicly accessible (through Land Information Ontario) portrait of water withdrawals within Ontario**

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**

As mentioned above, 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 theresa@cela.ca to arrange a meeting.

Thank you for your time and consideration.

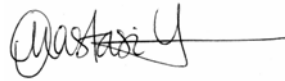
Sincerely,



Theresa McClenaghan
Canadian Environmental Law Association



Derek Stack
Great Lakes United



Anastasia Lintner
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Carol Maas
POLIS Project on Ecological Governance

Encl.: 2
c.c. Lindsay Maskell, Chief of Staff