







February 5, 2010























The Hon. James J. Bradley Minister of Municipal Affairs and Housing 777 Bay St, 17th Floor Toronto ON M5G 2E5

## Re: Water efficiency in MMAH policies

Dear Hon. James J. Bradley,

Congratulations on your new appointment as Minister of Municipal Affairs and Housing. We are writing to follow up on a letter we sent to the Honourable Jim Watson in November, 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*. Along with revisions to the *Ontario Building Code*, this strategy has the potential to enhance water security and the ability of Ontarians to adapt to the impacts of climate change. The benefits for Ontarians of water conservation and efficiency will include long-term relative cost savings to homeowners, businesses and municipalities on both their water and energy bills.

There is a significant opportunity for water efficiency improvements in residential building and the way we plan our urban communities. Many of the proposed policy changes would alleviate the need to dole out millions of municipal dollars in toilet, showerhead and clothes washer rebates.

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 associated with water services is a significant proportion of municipal and residential 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 Municipal Affairs and Housing 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 MMAH policy, we urge you to support the following key opportunities:

- Incorporate water efficiency principles into the Ontario Building Code
- Update the Ontario Building Code to reflect best available technology and include a water efficiency expert in the Building Code review process
- Make funding grants issued by MEI, MMAH and other provincial ministries and agencies contingent on water conservation initiatives
- Include water efficiency as an aspect of all energy efficiency programs, policies & projects where applicable

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

- Require water conservation plans for specified land use planning decisions
- Mandating conservation plans for water taking permit holders and municipalities
- Supporting 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)
- Acknowledging water conservation as the most economical form of new water infrastructure, and providing funding for water conservation initiatives accordingly
- 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 so as to integrate and maximize the joint savings of these diverse aspects of municipal planning

We would like to request a meeting with you in the next couple of weeks to discuss how the Ministry of Municipal Affairs and Housing 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,

Theresa McClenaghan

Canadian Environmental Law Association

Anastasia Lintner

**Ecojustice Canada** 

Derek Stack

Great Lakes United

Carol Maas

POLIS Project on Ecological Governance

Encl.: 2

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