



February 5, 2021

Brent Taylor, Senior Policy Analyst  
Water Policy  
Ministry of Environment, Conservation and Parks  
Foster Building 10<sup>th</sup> Floor  
40 St Clair Ave W.  
Toronto, ON M4V 1M2

Dear Brent,

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

Beef Farmers of Ontario (BFO) appreciates the opportunity to comment on *ERO 019-2017 Proposed Implementation of Updates to Ontario's Water Quantity Management Framework*. BFO represents 19,000 beef farmers in Ontario by advocating in the areas of sustainability, animal health and care, environment, food safety, and domestic and export market development.

BFO's comments will focus on the proposed changes to establish priorities of water use in Ontario that will guide water taking decisions and the enabling of an area-based approach to assess and manage water takings in water stressed areas. The establishment of a "priorities of water use" to guide decisions when there are competing demands for water is an effective method to assist possible water stressed areas. BFO views the designation of livestock water use in the "Priority 1: Drinking Water" category as very positive. The inclusion of livestock in Priority 1 highlights how vital livestock agriculture is to Ontario's food production system.

However, the proposed guidance to support the implementation of Area-Based Water Taking Management Strategies for water stressed geographic areas does raise some concern. Despite livestock being included in the Priority 1 water uses and while this proposal focuses on permitted water takings, there is concern this proposal could impose future conditions or restrictions on livestock water taking in designated water stressed areas. Within water stressed areas, ensuring livestock have adequate drinking water and acknowledging the importance of Ontario's food production system must be remembered as highly important factors when such policy decisions are made. BFO requests that we be included to participate and comment further on the development of the Preliminary Assessment stage and through-out the development of the Area-Based Water Taking Management Strategies.

Thank you for the opportunity to provide feedback on the proposed amendments to Ontario's Water Quantity Management Framework. We look forward to being included in future discussions related to the Framework.

Sincerely,

Rob Lipsett  
President