



Ontario Federation of Agriculture

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The Honourable Leona Dombrowsky
Minister of the Environment
135 St. Clair Ave. W., 12th Floor
Toronto, Ontario
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January 10, 2005

Dear Minister Dombrowsky:

RE: Permit To Take Water Application Fees

It was with great disappointment and displeasure that the Ontario Federation of Agriculture read your December 23, 2004 news release regarding Permit to Take Water Fees.

It is OFA's position that all agricultural operations be exempt from a water taking charge – both administrative and usage charges. Farmers should have administrative fees waived in recognition of the services that farmers render to the environment and to the community as a whole, which amount to more than the administrative fees. Many farmers use surface water for irrigation. Impurities in this water are removed as it percolates through the soil. Farmers are currently providing many safeguards that protect water supplies across the country through buffering, voluntary setbacks from natural and man-made water sources, tree planting, rotations, residue management, cover crops and permanent vegetation against watercourses, to name some of their initiatives, for which they receive little if any compensation.

OFA's policy and supporting rationale has been presented to your Ministry on a number of occasions.

Agriculture, unlike other businesses, is unable to pass increased costs onto the consumer. We are price takers. For example, water bottlers can increase the cost of each bottle of water to recover the application fee and any further studies they may need to commission for their application. Farmers cannot do this. And, this comes at a time when farmers are facing a fragile and worsening economic situation.

Minister, can you guarantee that agricultural Permit To Take Water Applications will be issued for a minimum of ten years? Will Category 2 application fees include the costs of the specialized studies required for these applications? How much money will farmers have to spend to access the water required to save their crops, their years income, and

consequently, be able to feed Ontario's population? What recognition do farmers have of their contribution to society through the provision of safe, affordable, nutritious food that is produced using best management practices designed to minimize environmental impacts? In our calculation, the answer is NONE!

There are also substantive concerns around the service levels for the fee paid. One need only look at the current backlog in issuing permits to be sceptical. Is water allocation policy in Ontario coming down to whomever can pay will get the water?

Minister, it is essential that you review your policy on Applications for Permits to Take Water. I would be happy to discuss this issue with you in greater detail if you require further information.

I look forward to the announcement of agriculture's exemption from the permit application fee.

Sincerely,



Ron Bonnett
OFA President

RB/ts

cc: Honourable Dalton McGuinty, Premier of Ontario
Honourable Steve Peters, Minister of Agriculture
Ontario Commodity Groups