



File No.

13.221.008

To: Janet Laird, Director of Environmental Services
From: Dave Belanger, Water Supply Program Manager
Division: Waterworks
Date: May 2, 2007
Subject: **Notification of Application for Permit to Take Water**
Ministry Reference Number: 0275-6ZSQSL

Nestlé Canada Inc., operating as Nestlé Waters Canada, proposes to renew an existing Permit to Take Water No. 6673-6CAJWK for the taking of water from a supply well as follows:

- Source Name: Drilled Well TW3-80
- Purpose of Water Taking: Bottle Water
- Maximum rate of taking per minute: 2500 Litres
- Maximum number of hours of taking in a day: 24 hours
- Maximum volume of taking per day: 3600000 Litres
- Maximum number of days of taking in a year: 365
- Length of Time: 5 years

The Nestlé Well, TW3-80, is located in Aberfoyle, in the Township of Puslinch and lies approximately 3.2 km from the southern boundary of the City of Guelph.

Waterworks has reviewed Nestlé's Permit to Take Water (PTTW) application and the Nestlé 2006 Annual Monitoring Report prepared by Conestoga-Rovers and Associates (CRA). In its review, Waterworks considered potential impacts from the Nestlé water taking on the City's current and future water supply.

Potential Impacts on Current Water Supply:

The City operates 22 municipal water supply wells in and around the City and in the Arkell Spring Grounds. The City municipal wells primarily draw their water from the Amabel Formation which is the same bedrock formation as used by Nestlé.

Memo



Nestlé Canada Inc. has applied to the Ministry of Environment (MOE) for a renewal of an existing PTTW of 3,600 m³/day to supply its water bottling plant in Aberfoyle in the Township of Puslinch. The Nestlé water taking lies in the Mill Creek watershed and the City of Guelph's water taking for its municipal wells lie in the Eramosa River and Speed River watersheds. A review of groundwater capture zones for the City's wells indicate that the current capture zones do not extend into the Mill Creek watershed and, in the southern part of the City, do not extend past the Paris Moraine and the groundwater divide between the Speed River and Mill Creek.

Similarly, based on drawdown information provided in the Nestlé 2006 Annual Monitoring Report, the capture zone of the Nestlé well appears to be limited to the immediate area of the well and does not appear to extend to the Mill Creek watershed boundary.

Based on this information, the Nestlé water taking will not interfere with the City's water taking over the next five years. Nestlé has not proposed to increase its taking such that it would change these groundwater capture zones and interfere with the City's current water taking.

Potential Impacts on Future Water Supply:

The City of Guelph, as part of its 50-year Water Supply Master Plan (WSMP), has identified areas in the south end of the City and in the Mill Creek watershed for potential future increases in its water supply. Two specific areas were identified in the Mill Creek watershed: one to the northeast in the headwaters of Mill Creek (southeast of the City); and one in the central part of the Mill Creek watershed (southwest of the City) on the Mill Creek/Irish Creek boundary. (Note: The WSMP stipulates that these areas would only be developed as water supply sources with the cooperation and approval of the Township of Puslinch.)

The WSMP identified these areas based on an understanding of *available* groundwater, which in turn was dependent on assumptions of current water takings in the watershed versus the amount of groundwater recharge across the area (i.e. the water budget for the watershed). Since the amount of available groundwater is finite, any increases in the water taking would reduce the amount of available groundwater for municipal use. Future municipal drinking water supplies may be limited if Nestlé or other users maintain or increase the total water taking from the Mill Creek watershed.

Recommendation:

Waterworks recognizes that the Permit to Take Water process is intended to allow for the beneficial use of waters while ensuring the fair sharing, conservation and sustainable use of waters of Ontario. However, Waterworks would prefer that no new water takings be permitted in the City and surrounding area, other than for municipal, domestic and agriculture use. It is important that the MOE recognize that are limits to the local drinking water supply and controls must be placed on local water use to accommodate future municipal growth.



On a technical basis, Waterworks is not opposed to the renewal of the Nestlé PTTW for a five year period since, based on available information, their current water taking will not interfere with the City's water takings over the next five years. However, Waterworks does have concerns regarding the availability of water supply in the area to satisfy future municipal growth. Waterworks requests that the MOE not increase Nestlé's PTTW beyond its current approved rate and that, prior to any future renewals of the current permitted rate, the MOE consider the water needs of all municipalities in the area and the constraints of the natural ecosystem to provide sustainable drinking water supplies.

Yours truly,

A handwritten signature in black ink that reads "Dave Belanger". The signature is written in a cursive style.

Dave Belanger, M.Sc., P.Geo.
Water Supply Program Manager

cc: Mayor Karen Farbridge and Members of Guelph City Council
Peter Busatto, Manager of Waterworks