

**Ministry of the Environment,
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Environmental Permissions Branch
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**Ministère de l'Environnement, de la
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October 2, 2026

Township of Melancthon
Attn: Denise B. Holmes, Chief Administrative Officer/Clerk
157101 Highway 10
Melancthon ON L9V 2E6

Sent via e-mail: dholmes@melancthontownship.ca

**Re: Strada Aggregates Inc. Shelburne South Pit, Permit to Take Water Amendment
Application (Ministry Reference No. 4235-DL5A93; Environmental Registry of Ontario No.
025-1082)**

Dear Denise Holmes,

On behalf of the Ministry of the Environment, Conservation and Parks (the "Ministry"), I am responding to concerns raised by the Township of Melancthon (the "Township") regarding the above-noted Permit to Take Water (PTTW) application submitted by Strada Aggregates Inc. ("Strada") for the Shelburne South Pit. Specifically, regarding the Township's concerns raised in the following correspondence:

- Letter from the Township dated June 22, 2026 and titled "Strada Aggregates Inc. PTTW No. 3210-AKRL9C and ARA Licence No. 129167, 625155 and 626199"; and
- Letter from legal counsel David N. Germain sent on behalf of the Township dated June 23, 2026 and titled "Township of Melancthon re Permit to Take Water amendment application (ERO 025-1082) Our File No. 501050."

Please note that the letter from the Ministry's Guelph District Office dated September 11, 2026, addressed the Township's concerns pertaining to compliance with the existing PTTW (No. 3210-AKRL9C), while this letter is addressing the remaining concerns pertaining to Strada's application to amend the existing PTTW under Application Reference No. 4235-DL5A93.

The Ministry has issued PTTW No. 8115-DY2LP4 (the "amended PTTW") as of October 2, 2026, which revokes and replaces PTTW No. 3210-AKRL9C; a copy of the amended PTTW is attached for the Township's reference. The information and concerns raised by the Township, including its comments of October 31, 2025, have been carefully considered in this decision, together with the findings of the Guelph District Office's compliance review. The amended PTTW includes additional monitoring and reporting conditions intended to support continued compliance oversight and conformance with Ministry standards. The notice for this decision can be found on the Environmental Registry of Ontario at <https://ero.ontario.ca/notice/025-1082>.

The Ministry appreciates the detailed comments provided on behalf of the Township, including the reviews prepared by Bluewater Geoscience Consultants Inc. and Hydrogeology Consulting Services Inc. (HCS). I am providing some further information below regarding how the comments were considered in the Ministry's review.

The Ministry sought further clarification from Strada with respect to the rationale for the requested increase in the maximum daily taking (up to 5,040,000 litres per day for 250 days between April 1 and December 6 of each year), and whether this request was in any way contingent upon approval of the separate application to amend the *Aggregate Resources Act* (ARA) license for the site, which remains under consideration by the Ministry of Natural Resources (MNR). Strada advised that production at the Shelburne South Pit has increased and that the requested volume for aggregate washing reflects current operational requirements as well as anticipated production volumes over the ten-year term applied for. Strada confirmed that the requested taking is for aggregate washing purposes only, with no dewatering planned. A condition has been added to the amended PTTW to clarify that, should the operation at the site proceed to below-water-table aggregate extraction, a new PTTW application would be required, supported by an updated hydrogeological assessment and accompanied by all monitoring data, reports and other records required by the conditions of the amended PTTW.

The technical matters raised in the HCS reviews were provided to Ministry technical staff and considered together with Strada's most recent (2025) Annual Monitoring Report. The inconsistencies identified by HCS between the reports supporting the amendment application and those supporting the ARA amendment proposal relate to that proposal and are matters for MNR's review under the ARA. Note that the Ministry's review of the PTTW application did not rely on the reports prepared in support of Strada's ARA amendment proposal, which is a separate proposal for a different set of activities.

The Township's submissions also questioned the conclusion that the surface water features adjacent to the wash pond are perched above the water table. The amended PTTW compels additional monitoring at the adjacent wetland and vernal pool and analysis of these data to determine more conclusively whether these features are in fact perched or if they are hydraulically connected to groundwater.

While a decision has now been made on this PTTW application, the Ministry remains committed to communication with the Township about water resources management issues under MECP's jurisdiction at the Shelburne South Pit, and at other sites of interest to the Township.

Should you have any further questions or comments about the amended PTTW, please refer them to Ajay Persaud, Environmental Scientist, at ajay.persaud@ontario.ca.

Sincerely,



Neil Taylor, M.Sc.

Supervisor, Permit to Take Water Program
Environmental Permissions Branch
Ministry of the Environment, Conservation and Parks

c: David N. Germain, Thomson Rogers LLP