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February 13, 2015

Satish Deshpande, Team Leader
Ontario Ministry of the Environment and Climate Change
Environmental Sciences and Standards Division
Standards Development Branch
Drinking Water Standards
40 St. Clair Avenue West, 7th Floor
Toronto, ON M4V 1M2

Dear Satish Deshpande,

Re: Technical Discussion Paper on Proposed Ontario Drinking Water Quality Standards

The Ontario Public Health Association (OPHA) values the opportunity to provide comments on your ministry's Technical Discussion Paper on Ontario Drinking Water Quality Standards. As a non-profit organization that brings together a broad spectrum of groups and individuals committed to improving health and wellbeing, we welcome measures that protect and enhance people's health. As the provision of a safe and potable drinking water supply is vital to all Ontarians, the public health sector is actively involved in managing human health risks associated with the provision and safety of drinking water here in Ontario and across Canada. Outlined below are our comments in response to your ministry's proposed changes.

The OPHA supports the proposed revisions to the Ontario Drinking Water Quality Standards (ODWQSS) as they pertain to the four substances listed in the Technical Discussion Paper (i.e. arsenic, carbon tetrachloride, benzene, and, vinyl chloride,) and welcomes the creation of new standards for the four compounds identified (i.e. chlorate, chlorite, 2-methyl-4-chlorophenoxyacetic acid (MCPA), and haloacetic acids (HAAs).

The following are areas included in the Technical Discussion Paper which we recommend be addressed:

- While OPHA supports the Ministry's efforts to update the ODWQSs by lowering the reportable, allowable levels of these substances, at the same time smaller Ontario accredited labs will need support to be able to provide accurate low level test results for these parameters.
- The proposed changes to the standards could have implications for monitoring of source water protection zones and modeling of water plant intake zones. They can also serve to alert local public health units when there are Imminent Drinking Water Health Hazards (IDWHH's) (e.g. benzene and those that are defined as a drinking water health hazards under the Safe Drinking Water Act, 2002, S.O.2002, Chapter 32). As a consequence, there will need to be effective communication between professionals working in public health and those at the Ministry of Environment and Climate Change to ensure continued protection of the sources for drinking water.

The Discussion Paper classifies some of the compounds, such as arsenic, benzene and vinyl chloride, as human carcinogens while others are noted as demonstrating serious, non-cancer health impacts in humans and animals. These additions to the standards are welcomed and important to help minimize exposure to contaminants from all sources over a lifetime and maintain a cancer risk of less than one in one million. Once implemented by drinking water purveyors, adopting these new more rigorous drinking water standards will provide a benefit to communities and their residents, by helping reduce exposure to these compounds and providing a greater level of public health protection in Ontario drinking water supplies.

OPHA encourages the Ministry to work closely with Health Canada in order to continually improve drinking water quality standards in Ontario and ensure the most up to date science is used to make evidence based decisions on all target compounds that constitute a cancer risk greater than one in one million.

OPHA appreciates the opportunity to provide input on these important health based standards.

Please do not hesitate to contact me at pwalsh@opha.on.ca or OPHA's Environmental Workgroup Chair, Helen Doyle, at Helen.Doyle@york.ca, should you have any questions or wish to discuss our recommendations in more detail.

Thank you for your consideration.

Yours sincerely,



Pegeen Walsh
Executive Director