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July 7, 2014

Re: *Canada Gazette Part 1, Posted May 10, 2014, Proposed Regulation:  
Potable Water on Board Trains, Vessels, Aircrafts and Buses Regulation*

Dear Ms Strawczynski:

The Ontario Public Health Association supports replacing the 1954 Potable Water Regulations for Common Carriers (PWRCC) with the proposed *Potable Water on Board Trains, Vessels, Aircraft and Buses Regulations*. The provision of a safe and potable drinking water supply is vital to the operation of all federal modes of transportation in Canada. The public health sector is very involved in managing human health risks associated with the provision and safety of drinking water across Canada. The travelling public deserves the provision of safe drinking water wherever they travel.

The OPHA is a not-for-profit organization that provides a strong, unified and independent voice for all citizens committed to improving the health of all Ontarians. OPHA's unique multi-disciplinary, multi-faceted research and evidence-based approach to advocacy has earned recognition from decision-makers and resulted in securing for the organization a key role in decision-making processes that work to improve healthy public policy, health programs and health promotion initiatives.

It is particularly important that the proposed regulation include clear lines of communications with local health units in all the respective jurisdictions. Although this proposed regulation deals with the transportation sector, the water sources are land based suppliers for drinking water which may be inspected by other levels of government; therefore, good intergovernmental working relationships, clear roles, jurisdiction, and open lines of communications are imperative for the protection of human health. The protection of drinking water and the source to tap concept would still come into play for the provision of potable drinking water supplied to passengers on board conveyances.

The following are technical areas which we recommend be addressed:

- If the supply is treated with chlorine, it will also require chlorine residual testing and recording of test results. Testing for chlorine residuals particularly in distribution systems may also be necessary and should be included to assist with risk assessments.

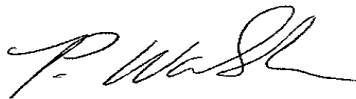
- Harmonization of laboratory bacteriological testing standards under the *Food and Drugs Act*, and specifically as outlined in Division 12, should be consistent with other local and provincial jurisdictions (i.e., total coliforms and *Escherichia coli* vs- Aerobic plate counts) and the Canadian Guidelines for Drinking Water Quality.
- Testing for *E.coli* is necessary and total coliform testing should also be conducted to assist with risk assessment of the drinking water supply.
- If there is a significant amount of handling or transferring of water from bulk storage containers then additional post treatment may be necessary.
- The provision of potable water will often require a coordinated action from all levels of government including public works departments and health units. The source water used for drinking water should also be risk assessed.
- Potable water systems and or containers will need to be cleaned and sanitized on a regular basis.

Many federally controlled properties such as international airports have a number of levels of government working within the same property. Therefore, the provision of potable water at these locations would be a multi-jurisdictional responsibility requiring collaboration and cooperation among all agencies.

In closing, we are encouraged by the Government of Canada's initiative to replace the outdated (1954) potable water regulations. The support of all levels of government is vital to ensure that this regulation will be successful in efforts to protect the travelling public through the provisions of safe drinking water.

Please do not hesitate to contact me at [pwalsh@opha.on.ca](mailto:pwalsh@opha.on.ca) or OPHA's Environmental Health Workgroup Chair, Helen Doyle at [Helen.Doyle@york.ca](mailto: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