



CWWA – POSITION PAPER FOR LEAD IN DRINKING WATER SYSTEMS

BACKGROUND

In 2017, Health Canada published a Consultation Guide for a new Drinking Water Quality Guideline for Lead in Drinking Water (2017, Health Canada).

CWWA's Drinking Water Quality Committee has reviewed the documents related to lead in drinking water systems. Health Canada's **Lead in Drinking Water** document references a new proposed Maximum Acceptable Concentration (MAC) of 5 µg/L (2017, Health Canada). Scientific evidence is increasingly supporting the conclusion that lead levels should be maintained at the lowest level possible (ALARA). The CWWA supports the overall conclusion, and agrees that water utilities should aim to meet this objective through both lead service line replacement and active corrosion control programs.

The CWWA further recommends the following actions related to the proposed guideline:

- That Provincial and Territorial Governments work with Municipal and Regional Governments within their jurisdiction to transition to the new regulatory limit through a phased-in and cooperative approach, recognizing that the new MAC of 5 µg/L will be difficult to achieve for some water systems and may take a number of years. Government agencies responsible for drinking water should work collaboratively with municipal water suppliers to understand the factors that affect lead levels and work to develop programs for reducing customer exposure to lead,
- That regulatory agencies confirm which sampling protocol will be used to determine compliance with the proposed MAC of 5 µg/L (ie. sampling location, protocol, lab testing, statistical approach, etc.),
- That proper sampling protocols and testing methodologies be developed for member organizations along the lines of the US EPA and the UK. Both organizations have information on their websites about proper sampling protocols and those resources are identified below (2005, USEPA and 2010, UK).
- That Provincial and Territorial Governments provide guidance for water suppliers to determine what constitutes ALARA in relation to the proposed MAC of 5 µg/L and

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regulatory compliance. For example, if a water utility achieves lead concentrations below 5 µg/L, are they required to take further action to lower lead concentrations?

- That legislative developments such as those occurring in the United States (US), be closely followed and monitored (2017, USEPA),
- That only laboratories accredited in Canada to ISO 17025 for lead be used to undertake the analysis on behalf of the water utility,
- That documents be developed by Health Canada to provide guidance on how to sample homes, institutions, and commercial buildings. Recommendations should be made for sampling methodology as well as information on how to deliberately select homes and buildings in areas with known lead services,
- That Health Canada, Provinces and Territories provide clarity on the limit of responsibility for water utilities with respect to the occurrence of lead in public buildings like schools and hospitals,
- That Health Canada's corrosion control guidance document, which is very useful and used by many water utilities, be revised to align with the new MAC of 5 µg/L, and updated to reflect lower action levels,
- That Provinces and Territories provide clarity about regulatory compliance for a utility when lead levels in a home or building are in part dependent on private plumbing and fixtures (including lead service lines) that are not under the direct control of the water utility,
- That Health Canada provide key messages and communication resources to help water utilities explain the new guideline to the public, including the potential health impacts for systems that in the short-term cannot meet the proposed MAC of 5 µg/L.

REFERENCES AND ADDITIONAL RESOURCES

(2017, Health Canada) **Lead in Drinking Water – Document for Public Consultation – see web link**

<https://www.canada.ca/en/health-canada/programs/consultation-lead-drinking-water/document.html#a2>

(2017, USEPA) **see web link -** <https://www.epa.gov/dwreginfo/lead-and-copper-rule#rule-summary>

(2010, UK) [http://dwi.defra.gov.uk/stakeholders/guidance-and-codes-of-practice/WS\(WQ\)-regs-england2010.pdf](http://dwi.defra.gov.uk/stakeholders/guidance-and-codes-of-practice/WS(WQ)-regs-england2010.pdf)

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(2009, Health Canada) Guidance on Corrosion in Drinking Water Systems – see web link
<https://www.canada.ca/content/dam/canada/health-canada/migration/healthy-canadians/publications/healthy-living-vie-saine/water-corrosion-eau/alt/water-corrosion-eau-eng.pdf>

(2005, USEPA) see weblink -
<https://www.epa.gov/sites/production/files/documents/samplingprocedures.pdf> -

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