



June 16, 2014

CDW Secretariat  
Water, Air and Climate Change Bureau  
Health Canada  
3rd Floor, 269 Laurier Avenue West, A.L. 4903D  
Ottawa, Ontario K1A 0K9

To: Committee on Drinking Water Secretariat

RE: Guidance for Issuing and Rescinding Boil Water Advisories

CWWA's Drinking Water Committee reviewed the proposed Guidance for Issuing and Rescinding Boil Water Advisories. The Association supports the recommendations made in the Guidelines and appreciates Health Canada and the Federal-Provincial-Territorial Committees continued commitment to providing science based guidance on water quality issues. The supporting information, as always, remains of great interest and is highly appreciated by our members. The document seems to be more relevant to smaller systems, but given the higher prevalence of advisories in these systems this seems appropriate.

Our members did have some concerns and suggestions that would strengthen the document and make it more useful for water utilities. We suggest that future editions include guidance on rebuilding public confidence following a boil water advisory. This remains a challenge for municipalities, and advice on this and broader customer service and communications issues would be invaluable as part of this document or as a stand-alone piece.

We also note that there is ongoing confusion in the industry about who is responsible for issuing a boil water advisory, the purveyor or the regulator. This document simply refers to the "responsible authority", which does not help alleviate the uncertainty. Clear Guidance on who is responsible for both issuing and rescinding an order would be invaluable to the sector.

The guidance states that boil water advisories are an important tool but we believe they will have little effect if they are overused. Eventually the public will ignore the notifications. It is important that boil water advisories are issued only when necessary from a scientific and public health perspective deemed.

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## Editorial Comments

We also would like to submit the following specific comments on the text.

Page	Section	Comment
General Comments		•
3	Part A	<p>1<sup>st</sup> sentence. <i>“The use of boil water advisories, issued by the responsible authority, is an important public health support tool.”</i>            Not too sure what is meant by “...public health support tool.”            The following wording is suggested:            The use of boil water advisories, issued by the responsible authority, is important for the protection of public health.</p>
3 – 4	A.1	<p>In general we agree with the recommendations in this section but it may not be practical to pull an incident response team together on short notice. An alternate approach is to have a well documented response protocol in place and to exercise (practice) it on a regular basis.</p>
4	A.2.1	<p>One of our members expressed the following</p> <p><i>“If the presence of E. coli is confirmed in drinking water, an emergency boil water advisory should be issued immediately.”</i></p> <p>This statement is too absolute and doesn’t allow for an evaluation/risk assessment process to take place. For example, if the water system, including water treatment, has been operating normally, the chlorine residual (in the E. coli positive sample) is normal and the results for samples taken on the same day in the same area of the water system are all negative then the E. coli positive is likely due to improper sampling identification, contamination either in the field or (less likely) in the lab. Issuing a boil water advisory in this case may have negative consequences that will outweigh any potential positive outcomes. Consequently, perhaps the following wording would help:</p> <p>In the event a positive E.Coli test occurs, enhanced monitoring and testing be undertaken immediately within the area the original test result occurred. This will help to confirm the original test result as positive in which case follow up action will need to be taken, or a negative result which result in no action being required. This approach could be elaborated on as discussed above on page 3-4 Section A.1</p> <p>Other members supported the more conservative approach favoured in the Guidelines, supporting the position that the presence of E. coli should immediately trigger a boil water advisory to ensure the maximum protection of human health.</p>

Page	Section	Comment
		<p>Further on in the same section, “Since treatment failures, such as a loss of primary disinfection, can result in the presence of pathogenic microorganisms in drinking water, they should also lead to the issuance of an emergency boil water advisory.”</p> <p>This may not apply to water supplies where the level of risk is very low due to high quality source water. Again, the wording should allow for an evaluation/risk assessment process to take place. The following sentence appears in section A, second paragraph: “Decisions concerning boil water advisories are made by the responsible authorities at the provincial/territorial or local level, using a risk assessment and management approach that is based upon site-specific knowledge and conditions.” Perhaps the same wording should be repeated in this section.</p>
5	A.2.2	<ul style="list-style-type: none"> <li>• “These situations need to be assessed on a case-by-case basis, and require the incident response team to conduct an investigation and site-specific risk assessment.” It’s good that this sentence is included in this section. But it’s likely not practical for the incident response team to be involved in each of the situations listed – this points to the need for organizations to have well documented response protocols including well defined roles and responsibilities.</li> <li>• We advise extreme caution in using persistent total coliforms as a reason to issue a precautionary boil water advisory. If the total coliforms are caused by bacterial regrowth in the water system, boiling the water won’t solve the problem and it will be extremely difficult to lift the boil water advisory.</li> <li>• As long as a water main remains pressurized when it is leaking or broken, there is no need to issue a precautionary boil water advisory.</li> </ul> <p>Again, it’s good to see wording in this section that allows the flexibility to consider these situations on a case-by-case basis.</p>
6	A.4	<ul style="list-style-type: none"> <li>• It may not be possible for a water system authority to provide answers to the entire list of questions. Eg. when the situation is expected to be resolved.</li> <li>• There is no mention that the notice to the public should be in multiple languages.</li> </ul>
6	A.5	<ul style="list-style-type: none"> <li>• This guidance should provide a link to this information as water utilities will want to pass it on to their customers and a link would be the easiest way to do it for the majority of people.</li> <li>• The very last paragraph in this section appears to be out of place in the document. We suggest that it might be more appropriate at</li> </ul>

Page	Section	Comment
		the end section A.3.
7	A.6	<ul style="list-style-type: none"> <li>We are glad to see that rescinding a boil water advisory is mentioned in section A.1 and is thoroughly discussed in section A.6.</li> <li>In A.6, the second bullet doesn't mention a requirement for monitoring but monitoring should be included for due diligence reasons.</li> </ul>
8	A.7	This is good information to include in this guidance document. To improve it slightly, include a link to the document referred to in the last sentence.

We have the following editorial suggestions to improve the French text as submitted by one of our Committee members.

Thank you very much for your consideration,

Kara Parisien  
Communications Coordinator,  
Canadian Water and Wastewater Association

**CONSULTATION**

**ON**

**A NEW GUIDANCE DOCUMENT**

**FOR**

**ISSUING AND RESCINDING BOIL WATER ADVISORIES**

**PREPARED BY**

**THE DRINKING WATER COMMITTEE – HEALTH CANADA**

**I – BACKGROUND**

The federal-provincial-territorial Committee on Drinking Water (CDW) requests comments on a new Guidance document for issuing and rescinding boil water advisories. The consultation period will end on June 16, 2014.

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Being a member of the CWWA Drinking Water Committee, I have read the French version of the Guidance document and I have prepared the present document to describe my comments and suggestions (1) on the Guidance document itself as it has been published and (2) on the presentation of the Guidance document.

## **II – ANALYSIS**

### **II – 1 The Guidance document itself as it has been published**

I wish to congratulate the federal-provincial-territorial Committee on Drinking Water (CDW) for the document on issuing and rescinding boil water advisories that, in my opinion, presents reliable information that will be useful for the correct management of drinking water, when a microbiological contamination is discovered or could be present.

It is important to inform not only those who are involved directly or indirectly in the supply of drinking water about these contaminants, but also those who own private systems that are more and more numerous and can become the cause of waterborne disease outbreaks affecting travelers or older people.

### **II – 2 The presentation of the Guideline document**

While reading the French version of the Guidance document, I have noted some “weaknesses” that have to be addressed and evaluated by the CDW to improve the final French version of the Guidance document. I will present them (see attachment) as they were read in the PDF document and they will be identified accordingly (**Section, page, paragraph, line**, for example). I also ask some questions about the text itself.

Again, I would prefer if the text used the word « stations » instead of the word « usines » as it is on page 3, section A.1, parag. 1, line 8, for instance, and elsewhere in the text.

Finally and again, I express the opinion that the family of words “réduire” and “réduction” are ambiguous because in the field of chemistry, they are the opposite of “oxyder” and “oxydation”. Therefore, I highly recommend that the words “diminuer” and “diminution” should be used in the text. There is an example in Section A.7, parag. 1, line 3, : ...d’en diminuer la concentration....

## **III – CONCLUSION**

I agree with the approach chosen by Health Canada to prepare that new Guidance document for issuing and rescinding boil water advisories. However, I hope my comments, suggestions and questions will help improve the final French version of the Guideline.

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Pierre-André Côté, D. Sc., chimiste

May 26, 2014

Att: Table of comments, suggestions and questions

**COMMENTS, SUGGESTIONS AND QUESTIONS ABOUT THE GUIDANCE DOCUMENT FOR ISSUING AND RESCINDING BOIL WATER ADVISORIES**

<b>Section</b>	<b>Page</b>	<b>Parag</b>	<b>Ligne</b>	<b>Comment, suggestion or question</b>
Title				I suggest the use of <b>Levée</b> instead of <b>Annulation</b> in the title of the document and everywhere in the document
Table des matières			B.1	Raisons pour <b>lesquelles</b> un avis.... That modification should be made inside the document also
Renseignements généraux	2	2	5	...une évaluation très <b>limitée</b> des risques...
A	3	1	1-2	...est un <b>outil de soutien important</b> en santé publique.
		Note at the bottom	5	...la définition d' <b>approvisionnement</b> en eau... as it is above on line 1 of the same paragraph
A.1	3	1	8	Use « <b>stations</b> » instead of « usines » here and elsewhere in the document
	4	1	3	... pour pouvoir <b>prendre des décisions rapidement...</b>
	4	1	4	...dans le bassin <b>hydrographique</b> ,...
			7	...n'est pas pratique <b>d'avoir</b> une telle équipe...
		3	12	... et <b>les endroits</b> où .....
A.2	4	1	1	...protéger les consommateurs <b>contre</b> les risques possibles...
A.2.1	5	1	6	...eau potable <b>par E. coli</b> ...
A.2.2	5	2 <sup>ème</sup> subdiv.	3	... <b>concentration de chlore résiduel</b> même correction pour 5 <sup>ème</sup> subdiv.
		4 <sup>ème</sup> subdiv.	1	..qui pourraient <b>dépasser la capacité</b> du système de ...
A.3	5	2	2	...et <b>le respect par</b> le public. Même correction en page 6, parag. 1 ligne 5.
A.4	6	1	1	...et <b>faciles à</b> ...
		1 <sup>ère</sup> subdiv.	1	...la raison pour <b>laquelle</b> ...
		8 <sup>ème</sup> subdiv.	1	...s'attendent <b>de régler</b> ...

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A.5	6	1	1	Il faut <b>faire</b> bouillir toute... Même correction en page 7, parag. 1, ligne 1 Pour être identique à page 7. parag. 3, ligne 1
A.5	7	2	7	Dans ce dernier <b>cas</b> ,....
			8	...pour prévenir la <b>présence</b> d'eau...
			11	...légèrement inférieure à <b>100 °C</b> .
		4	19	...ou un cycle de <b>désinfection</b> .
A.6	8	1	3	...qui <b>suivent</b> :
		1 <sup>ère</sup> subdiv.	2	...qualité <b>microbiologique</b> ... tel que dans Arbre C.1.1 où il est question d'analyse <b>microbiologique</b>
		2 <sup>ème</sup> subdiv.	3	... <b>toute l'eau contaminée</b> .
		2	7	Je ne comprends pas pourquoi l'absence de nouveaux cas ne pourrait pas être attribuable au fait que le problème est réglé. Si le cas est réglé, il est possible qu'il n'y ait plus de cas.
		4	3	...l'améliorer <b>pour le futur</b> .
A.7	8	1	3	...d'en <b>diminuer</b> la concentration...
			4	...non <b>volatils</b> ...
			9	...contaminant <b>en concentration inacceptable</b> est soupçonnée...
B	10	1	1	...un outil de santé publique <b>important</b>
		1	2	...n'est pas un indicateur de <b>qualité inacceptable</b> de l'eau...
B.1	10	Titre		...pour <b>lesquelles</b> ...
		Figure B1		Remplacer Ligne cassée par <b>Bris de conduite</b>
	11	Figure B2		Remplacer réduction par <b>diminution</b> sur la troisième ligne à partir du bas
B.2	12	1	1	...sont <b>confrontés</b> ...
C.1.1	13			Choisir entre <b>EC</b> ou <b>Ec</b> pour être identique partout dans le texte. Exemple : EC positif et ailleurs Ec négatif, ce qui semble le cas dans C.1.2