



September 16, 2016

CDW Secretariat
Water, Air and Climate Change Bureau
Health Canada
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Ottawa, Ontario K1A 0K9

To: Committee on Drinking Water Secretariat

RE: PFOS and PFOA in Drinking Water

CWWA and our Drinking Water Quality Committee have reviewed the new proposed Guidance documents for both PFOS and PFOA. As always we appreciate the comprehensive review of the current research on these subjects, and the contextual information for water utilities.

Our Committee did have a few concerns and suggestions with the proposed Guidance Document as follows:

Having a MAC of 0.6ug/l, while perhaps a commendable goal from a health standpoint; from a laboratory and treatment perspective it provides some challenges. At the present time very few if any analytical laboratories in Canada, public or private, seem to be able to measure to this level of MAC and be ISO 17025 accredited for it in drinking water. Consequently, we're not sure what is being achieved by having such a stringent target, notwithstanding the ability of water utilities to obtain a representative drinking water sample and access a Canadian laboratory accredited for this analysis cost effectively.

While most utilities will likely have no difficulty meeting the proposed MACs for PFOS and PFOA in drinking water, for those that do, the cost to remove them will be substantial. These substances are resistant to most conventional treatment and even some advanced processes. In some cases a full system redesign or replacement may be necessary to meet the MAC, which could be beyond the financial capacity of a utility.

Would it be possible for Health Canada to propose a higher MAC, or delay the publication of this guideline until the treatment and standardized analytical technologies are less expensive, more readily available and, in the case of the treatment, more effective.

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