



March 15, 2017

CDW Secretariat
Water, Air and Climate Change Bureau
Health Canada
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To: Committee on Drinking Water Secretariat

RE: Lead In Drinking Water

CWWA's Drinking Water Quality Committee has reviewed the proposed guideline for lead in drinking water along with the supporting documentation. The Committee supports the proposed guideline and views the proposed change from an MAC of 10 ug/L to an MAC of 5 ug/L as a progressive step, given that science cannot determine a safe level for lead in terms of human health effects. In addition, the Committee agrees with the concept that lead concentrations in drinking water should be kept as low as reasonably achievable (ALARA). In order to accomplish this, it will require water utilities to initially focus on controlling corrosion within the distribution and plumbing systems and it also may require removal of lead-containing components, such as lead service lines, from these systems.

- Although we support the overall objective and agree that a MAC of 5 µg/L is a reasonable long term objective we are concerned that many utilities will not be able to meet the MAC without significant time and investment. This situation will undoubtedly create media and customer scrutiny and affect a community's level of trust in public water supplies. It should be noted that some jurisdictions and the media interpret the Guidelines for Canadian Drinking Water Quality as immediate and legal requirements, that is, as standards. This has the potential to create an atmosphere of non-confidence in water supplies as soon as the revised guideline for lead in drinking water has been officially released by Health Canada. Furthermore, many smaller water utilities are likely to have been largely inactive in assessing their systems for lead, and will find themselves caught completely unprepared to meet the new MAC. It is recommended, therefore, that Health Canada include an implementation schedule in the guideline document that will recognize the practical challenges in a rapid transition to the new MAC. We understand that implementation is a jurisdictional matter determined by individual provincial

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governments, but feel that Health Canada should make the practical challenges and timelines explicit to help ensure continued public confidence in drinking water supplies.

The Committee has the following additional comments and questions for Health Canada to consider before it finalizes the proposed guideline for lead in drinking water:

If the federal government is committed to recommending a rapid transition to the proposed MAC, will the federal government commit funds either to help water utilities fund the significant costs associated with complete lead service line replacement, with implementing corrosion control and mitigation systems and/or to help home and business owners finance the replacement of lead lines beyond the property line.

- The Health Canada sampling protocols mentioned in the document recommend sampling in residential buildings as well as in schools. While this is undoubtedly necessary to assess and monitor lead levels in these locations, it does present particular logistical challenges and costs in gaining access to private homes, we note that developing sampling regimes, gaining necessary participation and permission from homeowners and implementing these systems will take time and significant financial investment.
- It would be helpful if the document provided guidance on how sample homes should be selected, made recommendations on random sampling and commented on deliberately selecting sample homes in areas with known lead service line issues.
- The document is somewhat bereft of the requirement to use 17025 accredited labs for sample analysis. In the Committee's opinion, the need for laboratory accreditation must be included within the scope of this guideline document. In light of the revised and reduced guideline level, this becomes quite important considering the significant financial investment water utilities will need to make. Furthermore, although PQL is well defined under the US EPA, surprisingly it is not within the Canadian context. Consequently, we recommend the document explicitly define it for Canadian water quality laboratories.
- Under Section 7.0 in the guideline, it is recognized that corrosion control and mitigation is an important tool available to utilities to manage lead levels. We note that some utilities may be able to meet the proposed MAC through corrosion control alone, while others will need to do more extensive lead service line replacements. Health Canada has developed a corrosion control guidance document, which is very useful and it is currently used by many water utilities. We request that this Guidance Document be revised to align with the new MAC, and updated to reflect lower action level.

We thank the Federal Provincial Committee for the opportunity to provide input on this important issue, and we hope that we can work together to improve the Guidance document itself, and move towards implementation in a sustainable and achievable manner.