

May 6, 2021

House of Commons Standing Committee
on Environment and Sustainable Development
ENVI@parl.gc.ca

Dear Committee Members:

RE: House of Commons Standing Committee on Environment and Sustainable Development's Study on Freshwater

We commend this important initiative and commit our Association to assist in every way possible.

We are the Canadian Water and Wastewater Association/association canadienne des eaux potables et usées (CWWA/ACEPU). And as THE national voice of Canada's water utility sector, we are pleased to provide this submission on behalf of the municipal water, wastewater and stormwater professionals across Canada.

This is a vitally urgent and time-sensitive matter. As our country, and our world, face the ever-increasing effects of climate change, we can no longer work in independent silos. This global crisis requires a bold, integrated vision and a coordinated National Water Strategy for Canada.

The urgency becomes greater each day. The CDP Global Disclosure's *Wave of Change* Report, 2021, states "The cost of water risks could be five times greater than the cost of acting now to prevent those risks". They go on to state, "The water crisis must be approached with the same emergency and innovation as the COVID-19 crisis – and the business case for action is clearer now more than ever."

As a start, we hope this effort will lead to a more collaborative approach between the dozens of federal departments and agencies that deal with water issues and facilitate greater communication and information sharing amongst the many federal entities. This can then lead to a more collaborative federalism in partnership with First Nations, provinces, territories, and municipal governments to develop national guidelines, direction and best practices.

One of the first, and most impactful, projects would be to collect and correlate all the water-related data from all these levels of government, as well as research from the academic and environmental sectors. Making this data easily accessible to all these partners would be invaluable.

As suggested, we followed the framework of questions provided from the Committee and our responses to each are attached. We have also attached the submission we provided to the Minister of Environment and Climate Change concerning the creation of a Canada Water Agency.

Sincerely,

Robert Haller

Robert Haller
Executive Director

Response to The House of Commons Standing Committee
on Environment and Sustainable Development
from the
Canadian Water and Wastewater Association
Association canadienne des eaux potables et l'usées.

Questions for stakeholders in preparation for the House of Commons Standing Committee on Environment and Sustainable Development's study on freshwater:

1. Introductory information

a) Which issues related to protecting and managing freshwater does your organization work on?

The short answer:

Drinking water supply and treatment, commercial/industrial water demand, sustainable water resources and watershed management, wastewater collection and treatment, stormwater management, flood preparedness and mitigation, climate change adaptation, dividing potable use from non-potable use, water conservation and water re-use.

The longer answer:

As THE *national* association of Canada's water utilities, our members are dedicated to providing a safe and reliable supply of drinking water to our citizens and businesses. Naturally, we are very concerned with the protection of freshwater resources, from both a quantity/supply concern and from a water quality concern. The sustainability of our public water systems depends on the reliability of our water resources, both surface waters and groundwater.

We are more than just managers of the mechanical operations; we are very involved in the wider watershed management.

Our members are also tasked with safely collecting and treating our communities' wastewater to protect those water resources for future water uses and for their invaluable enjoyment and recreation. We are not the wastewater producers, but the pollution control caretakers of this critically essential service.

As local environmental stewards, our operations divert waste from our rivers and lakes, converting that waste to reusable biosolids, fertilizers and energy. A failure of our wastewater systems would pose a significant threat to our freshwater environment. Equally, we are responsible for managing stormwater runoff, not just to protect property, but to address threats to our freshwater resources from road salts, fertilizers and chemicals.

As the municipal/regional water utilities, our members are the level of government most closely engaged with the public on issues of water use and conservation, tap water vs bottled water, appropriate use of toilets (flushing of medications, chemicals, wipes and plastics), sanitary drains and street drains, as well as urban flood plain development and flood preparedness and mitigation.

2. Interaction and collaboration with federal departments and agencies

a) Does your organization interact with federal departments and/or agencies on freshwater issues? If so, on which issues and with which departments and/or agencies?

The CWWA/ACEPU works directly with over a dozen federal departments and agencies. Here is a list of those we have dealt with in the last few years:

Health Canada

- Canada Drinking Water Quality Guidelines
- Climate Change effects on water quality

Environment & Climate Change Canada

- Wastewater Systems Effluent Regulations
- Climate Change Adaptation planning
- New Substance Program

Fisheries & Oceans Canada

- Wastewater Systems Effluent Regulations
- Fisheries Act (deleterious substance provisions)
- Environmental Assessments

Public Safety Canada

- National Critical Infrastructure Sectors Forum
 - with RCMP, CSIS and reps of other critical infrastructure
- Canadian Safety and Security Program - national cyber research project
- Canadian Centre for Cyber Security - national cyber research project
- National Flood Risk Roundtable – flood risk, mitigation, insurance and financial relief

Natural Resources Canada – flood mapping

National Defence

- Defence Research and Development Canada
 - national water sector resilience research

Canadian Council of Ministers of Environment

- National Biosolids Plan
- Canadian Guidelines for Surface Water Quality

Canadian Food Inspection Agency - biosolids

Indigenous Services Canada – water and wastewater services and support

Infrastructure Canada - financing municipal utility infrastructure renewal

- Disaster Mitigation and Adaption Fund (DMAF)
- Gas Tax Funds
- Clean Water Fund
- National Infrastructure Plan - financing municipal utility infrastructure renewal

Canada Infrastructure Bank - financing municipal utility infrastructure renewal

Industry Canada – Competition Bureau of Canada – defining ‘flushable’

Statistics Canada – utility surveys and data collection

International Joint Commission

- transboundary waters stewardship and flood management
- Great Lakes water quality programs

Foreign Affairs and International Trade Canada

- Clean Technology – support to international trade commissioners

National Research Council – Canadian Building Code, Canadian Plumbing Code, LEED

b) Do the specific freshwater issues targeted by your organization fit within the mandate of a given federal department and/or agency or do they relate to more than one department and/or agency? If more than one, have you been able to identify a lead department and/or agency with which to engage?

As noted above, there are at least a dozen federal departments and agencies that affect the operations of all water, wastewater and stormwater utilities in Canada. While almost every aspect of our operations falls under a federal department or agency, many aspects fall under multiple authorities. Some examples are:

The development of national regulations or guidelines without the financing to enact the national program - such as the Wastewater System Effluent Regulations (WSER) not recognized for priority funding in the National Infrastructure Plan funding programs – or the cutting in half of the permitted levels of Lead (Pb) in drinking water without funds or support to implement a practical plan, especially considering the problem lies on private services outside of the municipal utility’s jurisdiction.

The development of one program affects our ability to meet standards in another program – such as corrosion control methods to address Lead (Pb) affect our wastewater treatment and ability to meet the WSER – or meeting the new WSER captures more biosolids while restrictions on the storage, transit, use or disposal of biosolids have increased.

We have never had ‘one’ lead point of contact with the federal government, nor any forum or process for cross-departmental discussion.

c) Have you encountered notable successes in engaging with the federal government on freshwater issues? If so, please specify. If you have not had success in doing so, what in your opinion is the reason (e.g., no program available tailored to your needs, no identifiable service or unit within a department and/or agency with which to engage)?

One very good example of successful ‘collaborative federalism’ is the Federal-Provincial-Territorial Committee on Drinking Water that sets the Canada Drinking Water Quality Guidelines. While the final authority for regulating water quality rests with each province/territory, this committee facilitates collaboration amongst all provinces and territories to develop science-based guidance that each can then adapt to their specific geography and enact as local, enforceable regulation.

This committee, and the Health Canada team behind them, engage the utility professionals through our Association at an early stage and throughout the process. We worked closely on the development and release of the new Lead (Pb) Guidelines to ensure consistency of messaging to the public.

Another excellent example is the National Flood Risk Roundtable led by Public Safety Canada that brought together several federal departments, each province and territory, municipal leaders (FCM and CWWA/ACEPU), First Nations, and academics. The initial discussions led to two very active working groups – one on flood mapping and the other on insurance and financial relief.

d) Do you foresee engaging with the new Canada Water Agency? If so, in what way? What are your organization’s expectations with respect to the Agency?

CWWA/ACEPU absolutely expects to be engaged with the Canada Water Agency.

We were part of a coalition of Canadian environmental groups that provided submissions to the minister in addition to our own detailed submission. We will attach that CWA submission with this submission as well.

While academics and governmental policymakers provide great ideas and vision, practical water policies cannot be made without the critical involvement of Canada's working water professionals. Any national strategy will be implemented at the local level by the experts on the ground (or underground). We have offered our resources and network of water professionals to the Canada Water Agency and, of course, we offer the same to this Committee.

The key points in our submission regarding the CWA were:

- the urgency for a more coordinated and collaborated national effort to address global climate change
- facilitated collaboration of federal departments and agencies
- central data collection, from all sources, that can be made widely accessible

3. Federal water legislation, policies and regulations

a) Does your organization interact with federal departments and/or agencies on policies, legislation, regulations, or funding programs related to freshwater? If so, please specify.

See answer 2 a) above, but most specifically:

Health Canada – Canada Drinking Water Guidelines

Environment and Climate Change Canada – Wastewater Systems Effluent Regulations

Public Safety Canada – National Security Roundtable and cyber-security research

Public Safety Canada/ Natural Resource Canada – Flood Risk Roundtable & Working Groups

b) Can you identify any current gaps in federal water legislation, policies, regulations, and/or initiatives, or in general across jurisdictions? If so, please specify.

CWWA/ACEPU has advocated for many years for a more coordinated effort from the federal government amongst its departments and agencies addressing water. We have suggested in the past that a parliamentary secretary be named to facilitate communication, cooperation and collaboration amongst the many federal departments and agencies.

There is a desperate need for more national level data. As water and wastewater operations have been identified primarily under provincial/territorial jurisdiction, all-related data has been collected provincially. There is little national-level information and the national Municipal Utility Database (MUD) was discontinued years ago. The collection of provincial/territorial data and municipal data with federal data would be an incredible well of knowledge, to which we can add further data from our First Nations and hundreds of environmental NGOs.

c) Do you feel the federal government could play a more effective role in protecting watersheds in Canada? If so, which watersheds and how?

Yes, the federal government could certainly play an effective leadership role. You do not need to create a 'one-size-fits-all' enforceable regulation in order to lead. Our issues are shared across Canada, but not identical in each region. Like the Canada Drinking Water Quality Guidelines, science-based guidance can be developed through a collaborative national effort then adapted locally.

d) Are there areas of freshwater policy, legislation and/or regulation where you feel the federal government should play a greater role?

There are just so many isolated caches of data across Canada. Compiling and sharing that data in a useable and accessible format would be invaluable to many and further guide policy development.

e) Are there areas of freshwater policy, legislation and/or regulation that you feel the federal government should vacate and leave to another level of government or to the private sector?

No.

f) Are you aware of instances where federal freshwater policy, legislation, regulations, and/or initiatives have clearly benefitted from your organization's input?

See our response to 2 a), and we would hope that our involvement in all of those projects has been impactful.

4. Collection of information and data

a) Do you believe that there is sufficient data collected and made available publicly about freshwater in Canada?

Again, there is just so much data in isolated caches across Canada. Compiling and sharing that data in a useable and accessible format would be invaluable to many and further guide policy development. Ultimately correlating that data can help develop more predictive models to assist and improving ongoing water management operations.

b) Do you believe there should be improvement in freshwater-related data-sharing?

Yes, as noted above.

c) Is there any specific type of data or information you would like the federal government to provide to freshwater stakeholders?

We would appreciate something similar to the former Municipal Utility Database compiling data from each province and territory to provide basic information:

- number of systems and populations served
- number of plants and general technology used
- water volumes treated and distributed
- wastewater volumes collected, treated and released
- water quality testing, what does each test for,
- effluent testing, what is being released

d) Has your organization experienced challenges obtaining well-organized data from the federal government on issues relating to freshwater?

Yes, because most of the data we seek is not collected or available nationally, only provincially, and then not gathered in a standard format to allow comparison.

e) Is the lack of standardized data or information across government jurisdictions a problem or challenge for your organization in accomplishing its objectives with respect to protecting and managing freshwater?

One of the main missions of our professional association is to facilitate national information sharing. We remind our member utilities that they are not alone and that their issues are probably shared with many others. Being able to access data from beyond just their local region can help inform their immediate operations and their long range planning.

5. International and business issues

a) Should Canada play a greater role internationally in helping find solutions, either through government and/or the private-sector involvement, to the challenge of global freshwater security?

Absolutely. While we represent the utilities within Canada, we have a moral obligation to share our Canadian knowledge and know-how. This is also a tremendous economic opportunity to employ Canada's brightest and most inspiring leaders.

b) Do you feel Canadian private-sector companies, including financial institutions, can and should play a role internationally?

Absolutely.

c) What role can the federal government play in better supporting freshwater-related academic research, R&D, businesses, products, and services?

Continue to support private-public-academic research and solution development through groups like the Ontario Water Consortium or CentrEAU. Our utility members are pleased to collaborate with universities and private sector innovators to develop and pilot new innovation.