



March 10, 2026

Federal-Provincial-Territorial Committee on Drinking Water  
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**RE: Draft Guidelines for Canadian Drinking Water Quality Haloacetic Acids (HAAs)**

The Canadian Water and Wastewater Association (CWWA) is the professional association representing Canada's water and wastewater professionals and serves as THE national voice for municipal water utilities. The Association maintains a Committee on Drinking Water Quality composed of drinking water treatment experts from across the country.

The Committee reviewed the Draft Guidelines for Canadian Drinking Water Quality, Haloacetic Acids (HAAs). The Committee supports the proposed maximum acceptable concentration and appreciates the thorough review of the current science on HAAs. We are supportive of including bromochloroacetic acid (BCAA) in the determination of Total HAAs (i.e., now measured as HAA6) and maintaining the existing MAC value of 80 µg/L for Total HAAs, based on a locational running annual average of a minimum of quarterly samples in the distribution system. We are also supportive of the recommendation to take steps to reduce brominated-HAA formation if the locational running annual average for BCAA exceeds 10 µg/L. We agree with the suggestion that BCAA is an appropriate indicator of locations with elevated concentrations of brominated HAAs and to inform overall distribution system management planning to minimize HAA formation. We strongly support the advice that disinfection not be compromised in pursuit of lower HAA levels.

Thank you for your consideration

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