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Constituent Societies

OPHNL – Ontario Public Health
Nursing Leaders

Alliance for Healthier Canadians

Association of Supervisors of
Public Health Inspectors of Ontario

Canadian Institute of Public Health
Inspectors (Ontario Branch)

Community Health Nurses'
Initiatives Group (RNAO)

Health Promotion Ontario

Ontario Association of Public
Health Dentistry

Ontario Dietitians in Public Health

Association of Public Health
Epidemiologists

Ontario Society of Physical Activity
Promoters in Public Health

Charitable Registration
Number 11924 8771 RR0001

Environment and Climate Change Canada
905 Dufferin Street, 2S423
Toronto, Ontario, M3H 5T4

March 1, 2021

Dear Sir/Madame,

Re: Toward the Creation of a Canada Water Agency Discussion Paper

The Ontario Public Health Association (OPHA) appreciates the opportunity to provide comments on Environment and Climate Change Canada's *Toward the Creation of a Canada Water Agency Discussion Paper*. Our comments and recommendations are outlined below in relation to the various themes and questions outlined in the discussion paper.

General Comments

As our Canadian fresh waters are key to protecting human health, promoting safe public health practices and contributing to healthy lifestyles, including mental health, it is vital that we continue to protect our water sources. With the proposed formation of the Canada Water Agency, this initiative should be considered an important tool to help us protect and manage water as a precious resource for our children, the gatekeepers into the future.

Communities in Canada are experiencing many environmental impacts on our waters and challenges in part due to climate change. These include, for example:

- floods;
- high lake and ocean levels;
- increased water temperatures/eco system impacts;
- glaciers melting and animal habitat disruption; and
- increased high nutrient input levels in lakes and rivers, resulting in algae formation and risk to public health.

As a result of increased wet events linked to climate change, our sewage plants and septic systems are not always able to handle proper treatment and discharge untreated sewage into the receiving waters. This presents several public health risks and environmental impacts for disease transmission, recreational activities, drinking water sources and impacts on the natural environments and ecosystems.

Hence, OPHA offers the following comments on the discussion issues outlined in Section 3.

Section 3.1 Freshwater Objectives

Ensure First Nations Communities and People Have Access to Safe Drinking Water

OPHA appreciates the Government of Canada's acknowledgement of its previously stated objective to ensure First Nations communities and their residents have access to safe, clean drinking water. From a public health standpoint, having "**as of November 2020, 59 long-term drinking water advisories ... in effect in First Nations communities**" (Discussion Paper - Page #6), is clearly unacceptable and is a continuing public health risk. These practices have been going on in Canada far too long (40 plus years).

OPHA was pleased to see on page 19 of the Discussion Paper that, "The Fall 2020 Economic Statement committed the Government of Canada to accelerate work to lift all long-term drinking water advisories". Given this pre-existing commitment, it is startling that the topic of safe drinking water on reserves is not discussed in this consultation paper. We would recommend that the Agency play a role in helping to address these longstanding issues as part of its mission.

Therefore, **OPHA would strongly advocate for the new Agency to deal with these boil water advisories and drinking water issues as a priority for the Agency, given the federal government's responsibility for First Nations people and communities.** The Agency could then work in collaboration with Indigenous leaders, Health Canada and Indigenous Services Canada in its role as a new national *Canada-Wide Water Agency*.

Make Data and Information Available to Support Informed Decision-Making about Freshwater Issues at all Levels

It is also important for the proposed Agency to look at industrial and agricultural discharges into our waters, including the key chemicals listed on many toxic source water discharge lists (e.g. toxic 21 lists). The Agency should also look at the increasingly problem of *pharmaceuticals* and *endocrine disruptors* getting into our source waters that we use for drinking water and recreation; many of these chemicals cannot be removed using our conventional water treatment processes. In fact, recent science has shown that water ecosystems which are contaminated with endocrine disruptors (EDCs) are exhibiting impacts such as *feminization* in wildlife sentinels (birds), male (fish) species and frogs.

Toxics and other harmful pollutants were one of four key themes of the Great Lakes St. Lawrence Collaborative which released a report in 2019 entitled, Protecting the Great Lakes and St. Lawrence. Part 1: Great Lakes Action Plan 2030 with funding from Environment and Climate Change Canada (ECCC),

OPHA was honoured to participate on the Great Lakes St. Lawrence Collaborative by Co-Chairing the Toxics Issue Table. OPHA urges ECCC to implement all the recommendations within the Great Lakes Action Plan 2030 Report including, that:

1. The Federal Government, ECCC and Health Canada, develop a targeted environmental and human health effects monitoring, human biomonitoring and surveillance program to provide

early detection of unexpected effects in The Great Lakes Basin that feeds directly into a regulatory and non-regulatory response plan to reduce exposure.

2. ECCC and Health Canada develop guidelines to guide the generation and communication of data collected through the surveillance program and develop Guidance on the Appropriate Response to Exposure and Effects surveillance program data.
3. ECCC and Health Canada introduce a Strategy to Promote Substitution of Harmful Chemicals in Products, including a Centre for Chemical Substitution, and a Chemical Substitution Recognition Program.

Consequently, to meet the CWA freshwater objective that: “data and information are available to support informed freshwater decision-making at all levels”, **OPHA recommends that the following additional or enhanced objective be added: “Environment and Climate Change Canada and Health Canada develop a targeted environmental and human health effects monitoring, human biomonitoring and surveillance program to reduce exposure to harmful chemicals in the Great Lakes region.”**

Actively Engage Canadians in Managing and Protecting Fresh Water

OPHA believes that engaging affected communities throughout any change processes is vital. In response to the discussion paper’s objective of engaging communities, OPHA points to the second toxics reduction recommendation within the Great Lakes Action Plan 2030 Report regarding the generation and communication of data collected through the surveillance program. That recommendations notes that to be effective, an integrated environmental health monitoring and knowledge translation approach to data generation is required that includes broad multidisciplinary collaboration throughout the process (e.g. from the development of monitoring program, through to dissemination of information for informed decision-making and response).

Prioritize and Recognize Source Water Protection as Part of a Multi-Barrier Approach to Protect Drinking Water Sources for Health (recommending as an additional objective)

OPHA recommends that the Government of Canada include source water protection as a priority objective of the Canada Water Agency. After the 2000 Walkerton tragedy and Inquiry in Ontario where seven people died and 2,300 were ill after E. coli contaminated surface waters entered the town’s well, new legislation was enacted. As a result of the Inquiry, new regulations including an *Ontario Clean Water Act* with a source to tap approach (Inquiry Recommendation #65), were enacted to provide important public health protections to provide safe drinking water. These initiatives are now viewed internationally as excellent steps to provide *multi-barrier protections* to produce safe drinking water from our natural source waters both in the ground and above ground. As a result of those hearings, Justice O’Conner produced Part 1 and Part 2 Inquiry Reports with over 121 recommendations, many of which have now been implemented.

Part 2 recommendations of the Inquiry provide a useful roadmap and fit for the proposed *Canada Water Agency*. Included as an integral part in the formation of the Ontario Clean Water Act is the importance of *Source Water Protection* and the protection of drinking water sources.

The Agency's consultation document *does not seem* to provide much focus in this critical area for promoting a multi-barrier approach to protect Canada's sources of clean water.

OPHA therefore recommends that the Agency provide more focus in the **source water protection** area. To quote Justice O'Connor (Walkerton Inquiry Report #2): the "**first barrier to the contamination of drinking water involves protecting the sources of drinking water**" (1). In addition, the Walkerton recommendations also zeroed in on the importance of watershed-based planning for each watershed and working with partners such as local conservation authorities and other stakeholders (i.e. **Recommendation 1** -Drinking water sources should be protected by developing watershed-based source protection plans. Source protection plans should be required for all watersheds in Ontario. Walkerton Inquiry Report #2 pg-18).

Collaborative Arrangements are in Place and Support Effective Management of Domestic and Canada-U.S. Transboundary Fresh Waters

Regarding Transboundary Freshwater Management, the work of the International Joint Commission (IJC) has been pivotal over the years and needs to continue to help provide protection of the Great Lakes. The Agency could also highlight the following successful water protection program (Great Lakes Areas of Concern) as a possible roadmap to identify and encourage the clean up of toxic hotspots in Canada.

Since 1987, the **Great Lakes Areas of Concern** and **Remedial Action Plan (RAP)** initiative has proven to be a long standing successful international example which has had positive benefits for both Canada and the USA. The public support for this initiative was also successful with its use of the catchy framework: **Fishable, Drinkable and Swimmable**.

As mentioned earlier, the Great Lakes Action Plan 2030 recommendations can help support transboundary freshwater management and should be incorporated into discussions with the Canada Water Agency.

Section 3.2 Freshwater Policy, Coordination and Multilateral Engagement

OPHA supports the opportunities identified in the Discussion Paper with respect to "a whole-of-federal government perspective on freshwater priorities." **OPHA recommends that Health Canada and the Public Health Agency of Canada play a strong role in the development and implementation of the Agency, and that the management of freshwater systems for the protection of human health be explicitly stated as a priority objective of the Agency.** To emphasize the importance of freshwater to human health and the ecosystems that support them, **OPHA recommends that the Agency be named the "Canada Clean Water Agency".**

Section 3.3 Freshwater Prediction to Inform Climate Change Adaptation and Disaster Risk Reduction

OPHA is pleased to see that the Discussion Paper identifies actions to improve freshwater prediction to inform climate change adaptation and disaster risk reduction. The Great Lakes Action Plan 2030 includes a number of recommendations to address climate resiliency including that: "The Governments of Canada and Ontario commit to establishing and funding shoreline

resiliency priority zones to identify and address significant threats from climate change (high water levels, stronger wind/wave energy, erosion, sudden spring thaws, ice jams) impacting natural and built infrastructure on Great Lakes shorelines. Emphasis should be placed on naturalization and green infrastructure.”

Section 3.7 Freshwater Science

OPHA provides the following comments regarding the question of *What are the priority knowledge and research gaps to be filled to achieve effective freshwater management over the next 10 years?* Ontario public health units currently use fecal coliforms and total coliforms as indicators of microbiological impacts and to help understand and assess disease and other public health risks in water management. A new and evolving science-based system for microbiological detection is now utilizing genomic technology which studies genetic information with DNA and RNA; this approach can provide a comprehensive monitoring of pathogens and pollutants and help to identify their specific sources (i.e. is it from human vs animal contamination) and target clean up efforts. Similar technology is now being used during the current pandemic PCR testing. A recent example of this type of technology is COVID-19. The virus is now being found in most of our community sewage plant waters, which can represent virus risks to both workers and community health.

As noted earlier (see section on Data and Information), OPHA agrees with the Discussion Paper’s acknowledgement on the need to tackle challenges such as drinking water contaminants and excess nutrients and pollutants as well as “promoting a comprehensive source-to-tap approach, monitoring raw drinking water quality and tracking it through its treatment, distribution, and delivery.” Implementing the recommendations of the Great Lakes Action Plan 2030, specifically a targeted environmental and human health effects monitoring, human biomonitoring and surveillance program, can go a long way to reducing the impact of pollutants in source waters and protecting population health and ecosystems.

Section 3.8 Freshwater Data

OPHA supports the opportunities identified in the Discussion Paper, specifically:

- a National Data Management Strategy, including principles and common standards to ensure that freshwater data is collected and managed in a consistent manner, leading to effective and efficient data integration that provides more comprehensive insights.
- a Freshwater Data Discovery Strategy that ... bring datasets together, ...and analysis techniques to freshwater data to support decision-making and other priorities.
- work with First Nations, Métis, and Inuit to share freshwater data and information, and ensure access to Indigenous knowledge, data, and information is respected.

To reiterate the recommendations of the Great Lakes Action Plan 2030, it is important that an integrated environmental health monitoring and knowledge translation approach to data generation and communication be implemented, and that is collaborative and involves affected communities directly.

The Great Lakes Action Plan 2030 emphasizes that: “Rather than gather and analyze data internally within government agencies, this targeted surveillance program must involve at-risk individuals and communities in the collection, interpretation and communication of the data...it is not just data that should be communicated. Information could also include surveys, research studies, as well as information products like reports interpreting monitoring results, health protection messages and health promotion material explaining risks of exposure to toxic substances.”

All Canadians deserve access to fresh, clean water that is free of contamination. They also deserve access to information that can help them make evidence-informed decisions to protect their families and their communities. Water is life and is essential to human health. We use water to grow our food and support healthy aquatic eco systems; water is critical for the economy and considered sacred and honoured by Indigenous peoples as the giver of all life.

On behalf of the Ontario Public Health Association and its members, thank you for the opportunity to provide input on this important consultation on safe water in Canada and the proposed new Canada Clean Water Agency.

Yours sincerely,



Pegeen Walsh
Executive Director
Ontario Public Health Association

More about the Ontario Public Health Association:

OPHA is a member-based, not-for-profit charitable organization that has been advancing the public health agenda since 1949. OPHA provides leadership on issues affecting the public's health and strengthens the impact of those who are active in public and community health throughout Ontario. OPHA does this through a variety of means including influencing public policy, capacity building, research, and knowledge exchange. Our membership represents many disciplines from across multiple sectors. OPHA is also home to Nutrition Connections (formerly the Nutrition Resource Centre) which advances nutrition knowledge and collaboration

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