



Canadian Environmental Law Association  
L'Association canadienne du droit de l'environnement

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October 9, 1990

Ms. Marbeth Grier  
City Clerk Department  
Secretariat, Board of Health  
2nd Floor, City Hall  
100 Queen Street West  
Toronto, Ontario  
M5H 2N2

Re: The Quality of Drinking Water in Toronto Report

The Canadian Environmental Law Association regrets that we were unable to attend your Board of Health meeting on October 4, 1990, to address the Board of Health on this important report. We would ask that this written submission be distributed to the members of the Board of Health with the other deputants' submissions.

Thank you for your attention to this matter.

Yours sincerely,

**CANADIAN ENVIRONMENTAL LAW ASSOCIATION**

Sarah Miller  
Co-ordinator

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Submission to the Toronto Board of Health  
Re: "The Quality of Drinking Water in Toronto" Report

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The Canadian Environmental Law Association applauds the efforts of the Department of Health to undertake ~~research in typical background exposure to trace contaminants from various pathways of exposure.~~ <sup>which</sup> This precedent-setting research, <sup>will</sup> go a long way to address public concerns about chronic exposure to these <sup>toxic</sup> substances which prevail in our lives. It will enable the public to make informed lifestyle choices to protect themselves from exposure.

<sup>CCLA</sup> While ~~we~~ <sup>The study</sup> supports your recommendations to other jurisdictions about initiatives they should take to put in place A Safe Drinking Water Act and to pursue the goals of virtual elimination of persistent toxic chemicals, <sup>CCLA</sup> ~~our~~ work in the Great Lakes has led us to conclude that the elimination of persistent toxics which are being recycled throughout our environment will not be achieved in the near future. Even if we were able to eliminate all present inputs of substances of concern, we would need to take further steps to protect drinking water supplies. There is mounting evidence from the scientific work carried out in the Great Lakes that high risk populations such as mothers, children, the elderly, the environmentally sensitive, and populations who eat Great Lakes fish, are manifesting subtle but serious health effects from chronic exposure to chemicals. This makes it morally imperative for the City to do all it can to limit Torontonians' exposure through their tap water.

*The drinking water report*

<sup>Should begin</sup> Your report has concluded that the wide range of quality and the potential for bacterial contamination in bottled water and the potential for bacterial build-up in point-of-use devices eliminate them as safe options. However, <sup>the</sup> your tests of tap water revealed the alarming presence of many chemicals of concern, particularly lead and aluminum. The choice for consumers is at best bewildering. ~~We~~ <sup>CCLA</sup> would support the recommendation to undertake <sup>A</sup> lead education program <sup>immediately</sup> and <sup>would</sup> ~~urge~~ <sup>with</sup> that the materials you provided will be in the many languages of Toronto's multicultural communities. The banning of lead solder should also be pursued locally with a local by-law.

*It is disturbing*

*the city's*

~~We are~~ <sup>also</sup> ~~disturbed~~ that since your first report on drinking water in April 1990, little further work has been undertaken to pursue alternative drinking water treatment for the City of Toronto, to more effectively reduce chemicals <sup>that</sup> you continue to <sup>be</sup> detected in drinking water. ~~We would urge that~~ <sup>alternative treatments</sup> <sup>be</sup> <sup>must</sup> pursued both to eliminate the chemicals and metals ~~you have~~ detected in tap water, as well as the known carcinogenetic tri-halo-methane by-products of the current chlorination treatment process. CCLA is <sup>also</sup> concerned that Canada's guideline for tri-halo-methane of 350 is too high; ~~the~~ <sup>the</sup> US and World Health Organizations standards are much lower (100 for the US). While Toronto levels do not exceed the current Canadian guidelines, there are many Canadian