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Environmental Health Directorate
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February 26, 1992

Toby Vigod
Executive Director
Canadian Environmental Law Association
517 College, Suite 401
Toronto, Ontario
M6G 4A2

RE: PROPOSED CONSULTATION ON TRIHALOMETHANES

Dear Ms. Vigod:

As a follow-up to your telephone conversation with my staff on the proposed pilot project consultation last fall, I wish to provide some background information on the scope of this up-coming consultation which is now scheduled to start in a month or so.

The provision of safe, potable water to Canadians has been and continues to be a provincial responsibility. The development of national drinking water guidelines, however, is a necessity for Canada and calls for a cooperative approach between provinces and the federal government. The first national guidelines were developed in 1968 by a joint committee composed of the Canadian Public Health Association Drinking Water Standards Committee and an Advisory Committee. Although the development of the 1968 Drinking Water Guidelines was conceived as a federal initiative, it involved active participation and co-operation of representatives from provincial agencies.

The 1978 Guidelines were again developed as a joint federal-provincial undertaking by a Working Group with members drawn from each province and territory and from the federal government. This group was disbanded in 1978 once the task was completed and national guidelines were established.

Canada

Because of the growing importance of and interest in drinking water quality, a Federal-Provincial Subcommittee on Drinking Water was set up in 1986 as a standing committee with a membership similar to that of the 1978 Working Group. This Subcommittee deals with a variety of factors concerning drinking water quality and treatment technology. However, the development of drinking water guidelines is its primary task. Since 1986, the Subcommittee has examined close to 40 additional substances and has re-examined the adequacy of the 57 guidelines developed in 1978. The Subcommittee has produced two Guidelines booklets to date. The most recent booklet, entitled Guidelines for Canadian Drinking Water Quality - Fourth Edition, was published in 1989 and includes recommendations for 87 chemical parameters, plus a list of 14 chemical parameters (which has since been expanded) that are under review for possible addition to the Guidelines. To date, the Subcommittee has developed about 65% of the guidelines set as a primary goal in 1986.

Although federal-provincial co-operation in the area of drinking water quality has continued to the present day in the setting of drinking water guidelines, there has been a perception that the guidelines are set without consultation with the drinking water supply industry and interested groups. The Subcommittee has identified a need to make this decision-making process of setting national drinking water guidelines more transparent and better understood by interested groups and the public. The Subcommittee proposes a focused consultation on proposed guidelines with eleven national organizations (see attached list). This consultation on trihalomethanes is a pilot project and will be evaluated within a year. It is not to be taken as a precedent.

The purpose of a focused type of consultation on trihalomethanes with national organizations is:

- to inform interested organizations of the intention to change the guideline for trihalomethanes,
- to solicit comments on the trihalomethanes Supporting Documentation (both the Criteria Summary and Treatment Technology) and provincial information, and
- to solicit comments on the proposed numerical guideline for trihalomethanes.

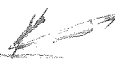
The consultation package is currently being prepared and should be ready for distribution by April of this year. A limited number of packages, in English and French, will be made available to each organization. The package contains a description of the process, states the issues on trihalomethanes and provides technical information in three appended documents. These three documents include a health assessment, a summary of available drinking water treatment technology

and a summary of provincial information on trihalomethanes monitoring in their respective jurisdictions.

The health assessment or criteria summary will eventually be part of the Guideline's Supporting Documentation and was prepared by staff of the Environmental Health Directorate, Department of National Health and Welfare, following critical evaluation of the available information on exposure, health effects, analytical methodology and treatment technology. The treatment technology appendix will also be part of the Supporting Documentation and describes in detail the performance of various treatment processes for control of trihalomethanes.

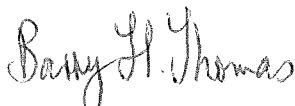
The last appendix will contain provincial summaries which provide information and data on trihalomethanes from the provinces that submit material. Each summary may include information on the province's sampling program, provincial exposure, drinking water plant operations in the province and the impact of the proposed guideline on these water plants. This provincial information will be prepared by each province and will be presented in the language in which it was submitted.

The Subcommittee will be soliciting your organization's written comments on all parts of the package that will be sent out. This includes comments on the proposed guideline value for trihalomethanes and on the information contained in the three appendices: criteria summary, treatment technology and provincial summaries. Your written comments should be the position of your organization or a summary of comments received from your membership. The proposed turn-around time will be approximately six months.

At this time, please confirm your interest in participating in this pilot project consultation on trihalomethanes and organizational contact and address to which consultation packages should be mailed. Also, please indicate the number of packages, in each language, you require. 

If you have any questions concerning this up-coming consultation, please contact David Green at 613 957-3130 or myself at 613 941-2037.

Yours truly,



Barry H. Thomas, Ph.D.
Head, Criteria Section
Monitoring and Criteria Division

Attach.

Intro 50 pages describes

*3 appendices
* Health Risk Assessment
* Treatment Technology
* Provincial Summaries*

consultation paper

**NATIONAL ORGANIZATIONS
CONSULTATION LIST**

Assembly of First Nations - Mr. Richard Jock ✓

Canadian Environmental Law Association - Ms. Toby Vigod ✓

Canadian Institute of Public Health Inspectors - Mr. Jim Bradley

Canadian Medical Association - Mr. Douglas Geekie

Canadian Public Health Association - Ms. Janet MacLachlan ✓

Canadian Water & Wastewater Association - Mr. Steve Bonk, P. Eng.

Consumers Association of Canada - Mr. Paul Reynolds ✓

The Federation of Canadian Municipalities - Ms. Pat Hunsley ?

Friends of the Earth - Ms. J. Lauger ✓

Rawson Academy of Aquatic Science - Mr. Don Gamble ✓

Society of Toxicology of Canada - Dr. Bruce Virgo