



CANADIAN INSTITUTE FOR  
ENVIRONMENTAL LAW AND POLICY

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Via Facsimile (204) 948 2125  
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**Re: Canada-wide Strategy for the Management of Municipal Wastewater Effluent**

Dear Ms. Vigano

Thank you for the opportunity to provide comments on the draft consultation of the *Canada-wide Strategy for the Management of Municipal Wastewater Effluent*. I am writing on behalf of the Canadian Institute for Environmental Law and Policy (CIELAP), which was founded in 1970 with the mission of providing leadership in development of environmental law and policy that promotes the public interest and sustainability. CIELAP has been involved in research and policy relating to the management of municipal wastewater effluent for at least three decades. Recently we published *Spotlight on Sustainability: Managing Sources of Municipal Wastewater* in 2004 and *There Is No "Away" - Pharmaceuticals, Personal Care Products, and Endocrine-Disrupting Substances: Emerging Contaminants Detected in Water* in 2006.

First of all, we wish to say congratulations on creating this draft strategy. It offers a comprehensive plan to protect water quality and human health from present and future water-borne threats. Nationally regulated wastewater standards are a timely and crucial development for a cleaner and safer environment and CIELAP commends the scope and complexity of the strategy's considerations. We would certainly be interested in working with the CCME on the development of a biosolids management strategy at a later date.

We are particularly pleased with the draft strategy's inclusion of the need to address pharmaceuticals and personal care products. Two of CIELAP's recent reports highlight the need for appropriate wastewater management to address these emerging contaminants. Our 2006 report *There is No "Away"* documents the detection of pharmaceuticals, personal care products, and endocrine disrupting substances as emerging contaminants in water sources, and presents a number of recommendations to address their risks. CIELAP's 2007 report, entitled *Hazardous Waste in Ontario: Progress and Challenges*, makes a number of recommendations to the province of

Ontario. These include the need to monitor and regulate pharmaceuticals and personal care products in sewage-treatment plants, document and report the quality of sewage discharge into water, and develop an improved stormwater management plan, in addition to further recommendations to address hazardous waste discharge. These reports and their recommendations can be downloaded from the CIELAP website at [www.cielap.org](http://www.cielap.org). We encourage the CCME to examine these documents and consider their recommendations with regard to the proposed strategy.

CIELAP would also encourage the CCME to set the highest possible standards for all provinces and territories instead of settling for the lowest common denominator. Rigorous water quality standards will ensure the long-term safety of citizens and the environment and bring justice to the intended goals of the strategy.

Once again, thank you for the opportunity to provide comments and we hope that CIELAP can work with the CCME in the future to further advance the appropriate management of wastewater effluent in Canada. Please do not hesitate to contact me or Maureen Carter-Whitney, CIELAP's Research Director should you wish to discuss our comments.

Yours sincerely

A handwritten signature in black ink that reads "Anne Mitchell". The signature is written in a cursive, flowing style.

Anne Mitchell  
Executive Director

cc. Claude Fortin, Environment Canada