



CANADIAN INSTITUTE FOR  
ENVIRONMENTAL LAW AND POLICY

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May 2, 2008

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Integrated Environmental Planning Division  
Land and Water Policy Branch  
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Dear Mr. Maude,

**Re: Protecting Lake Simcoe: Creating Ontario's Strategy for Action, EBR Registry  
Number 010-2974**

I am writing on behalf of the Canadian Institute for Environmental Law and Policy (CIELAP) to provide comments on the Ministry of the Environment's proposal to develop a Strategy to protect Lake Simcoe. CIELAP was founded in 1970, with the mission to provide leadership in the research and development of environmental law and policy that promotes the public interest and sustainability.

The purpose of this proposal is to develop a Strategy consisting of regulatory and non-regulatory measures to protect Lake Simcoe, including legislation and regulations, policies and programs, and a Lake Simcoe Protection Plan. In developing the elements of this Strategy, it is important to address public concerns about the environmental and human health impacts of emerging contaminants, such as pharmaceuticals and personal care products that have been found in water.

In 2006, CIELAP released a report – entitled *There is No "Away" - Pharmaceuticals, Personal Care Products, and Endocrine-disrupting Substances: Emerging Contaminants Detected in Water* – available at <http://cielap.org/pdf/NoAway.pdf>. This report highlighted research showing that between 50% and 90% of the active ingredients in drugs, including antibiotics and endocrine-disrupting compounds (EDCs), are not absorbed by the human body but instead are excreted. Improper disposal of pharmaceuticals and personal care products (PPCPs) through municipal solid waste or sewage systems also occurs due to a lack of public awareness of their impacts. As a result there is a high concentration of contaminants from PPCPs found in sewage. While some of these contaminants may be removed from sewage sludge by wastewater treatment, many are not.

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The Lake Simcoe Basin Wide Report of March 20, 2008 notes:

Lake Simcoe assimilates treated sewage treatment effluent from 14 Water Pollution Control Plants (WPCPs) but also is the drinking water supply for 6 communities in the Lake Simcoe basin which may represent a potential threat pending further research. Presently WPCPs do not treat their respective effluent specifically for the removal of PPCPs and EDCs. The effluent may therefore still contain PPCPs and EDCs among other potentially harmful chemicals. A cost effective technology to effectively remove these is presently not available. The release of treated sewage effluent that contains PPCPs has been identified by scientists as a potential risk to human health.

As a newly emerging area of research, there have not yet been standards proposed for pharmaceutical concentrations in sewage effluent or surface water. This creates difficulty in developing management control mechanisms or treatment alternatives for pharmaceuticals in sewage effluent. There has also been ongoing debate on the sampling methodologies, laboratory analysis and reporting thresholds for these parameters, further complicating an effective response to this issue at this time. The agencies, municipalities and researchers must remain diligent and closely monitor progress in this area and develop a strategy to respond, monitor and take action when necessary.

CIELAP's 2006 report highlighted a number of recommendations, including the need to: review sewage sludge management practices in light of issues related to pharmaceuticals and resistant bacteria in water; phase out the use of antibiotics and of hormones as animal growth promoters and review the use of preventive antibiotics in animal feed; and increase research on municipal water treatment technologies that better remove pharmaceuticals and related compounds.

Given the potential for PPCPs to pose a serious risk to the environment and to human health, it is important for the Ministry of the Environment to ensure that the Strategy addresses and reduces the potential impacts on Lake Simcoe of contaminants in PPCPs.

Another potential element in a Strategy to protect Lake Simcoe could be its inclusion under the *Greenbelt Act*. While some of the land adjacent to Lake Simcoe is protected as part of the Greenbelt surrounding Toronto, other areas such as in Simcoe County were not included. The likelihood of continued urban expansion in these areas will further threaten the water quality and health of Lake Simcoe by ensuring additional pressure on its waters and ecosystem.

In April 2008, CIELAP published a comparative study of five other greenbelts in Europe and North America, entitled *Ontario's Greenbelt in an International Context*, and available at <http://cielap.org/pdf/GreenbeltInternationalContext.pdf>. One of the primary recommendations in this report was that efforts be made to grow the Greenbelt in size in response to the threat of leapfrog development. As part of the Strategy to protect Lake Simcoe, the Ontario government should consider expanding the Greenbelt to include more of the lands adjacent to Lake Simcoe.

Thank you for the opportunity to provide input on this proposal. Please contact me or Maureen Carter-Whitney, CIELAP's Research Director, if you wish to discuss any of these comments further.

Yours sincerely,

A handwritten signature in black ink that reads "Anne Mitchell". The signature is written in a cursive style with a large initial "A".

Anne Mitchell  
Executive Director

Cc: Hon. John Gerretsen, Minister of the Environment  
Gord Miller, Environmental Commissioner of Ontario