



CANADIAN INSTITUTE FOR
ENVIRONMENTAL LAW AND POLICY

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Julie Schroeder
Manager, Water Standards
Ministry of the Environment
Environmental Sciences and Standards Division
Standards Development Branch
40 St. Clair Avenue West
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Fax: (416) 327-2936

Dear Ms. Schroeder,

**Re: Design Guidelines for Drinking-Water Systems 2007, EBR Registry Number
010-0548 and Design Guidelines for Sewage Works 2007, EBR Registry Number
010-0547**

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 proposed Design Guidelines for Drinking-Water Systems 2007 and Design Guidelines for Sewage Works 2007. 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. CIELAP has been involved in research and policy relating to the management of municipal wastewater effluent for at least three decades. In recent years, we have published *Spotlight on Sustainability: Managing Sources of Municipal Wastewater* in 2004 (available at <http://cielap.org/pdf/MunicipalWastewater.pdf>) and *There Is No "Away" - Pharmaceuticals, Personal Care Products, and Endocrine-Disrupting Substances: Emerging Contaminants Detected in Water* in 2006 (available at <http://cielap.org/pdf/NoAway.pdf>).

These Design Guidelines are being implemented to streamline the approval process for new drinking-water systems and sewage works, and reduce the corresponding development time. The revision and update of the 1984 Design Guidelines is intended to address criticism raised during the Walkerton Inquiry and public hearings that the current guidelines are dated, do not reflect current ministry policies and do not include certain established technologies applicable to Ontario conditions. The proposed guidelines intend to clarify the process by which new technologies may be established for full scale application in Ontario and include new and updated information that reflects current Ontario practice, applicable legislation and current ministry policies.

Advancing the Environmental Agenda

CIELAP supports the Ministry in its decision to update and clarify the 1984 Design Guidelines. CIELAP further commends the Ministry's efforts to offer help to municipalities and owners of drinking-water systems and sewage works in meeting Ontario standards for drinking water quality.

CIELAP would encourage the Ministry to consider the need to address pharmaceuticals and personal care products. Two of CIELAP's 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. This report highlighted research showing that between 50% and 90% of the active ingredients in drugs, including antibiotics and endocrine-disrupting compounds, 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.

CIELAP would also encourage the Ministry to address concerns about hazardous wastes discharged into water. CIELAP's 2007 report, entitled *Hazardous Waste in Ontario: Progress and Challenges* (available at <http://cielap.org/pdf/HazWaste2007.pdf>) 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.

As noted above, all of these reports and their recommendations can be downloaded from the CIELAP website at www.cielap.org. We encourage the Ministry to examine these documents and consider their recommendations with regard to the proposed guidelines. Rigorous water quality standards will ensure the long-term safety of citizens and the environment and bring justice to the intended goals of the guidelines.

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

Yours sincerely,



Anne Mitchell
Executive Director

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