

Hon. Laurel C. Broten
Minister of the Environment
12th Floor, 135 St. Clair Avenue West
Toronto, Ontario
M4V 1P5

5/14/2007

Honourable Minister,

RE: alPHa Resolution A02-6, Arsenic in Drinking Water

On behalf of member Medical Officers of Health, Boards of Health, and Affiliate organizations of the Association of Local Public Health Agencies (alPHa), I am writing to re-introduce the attached Resolution on arsenic levels in drinking water for consideration and anticipated action by your ministry.

In 2002, alPHa passed the attached Resolution to address the fact that the 0.025 mg/L MAC for arsenic (a known human carcinogen) in both the *Guidelines for Canadian Drinking Water Quality* and the *Ontario Drinking Water Standards* was not reflective of current evidence of risks to human health. The Resolution called on the Ontario Government to lower its MAC to 0.003 mg/L, which remains the evidence-based level at which the risk to human health is accepted to be essentially negligible.

In October 2002, alPHa received a response from the Ministry indicating that a Federal-Provincial-Territorial Committee on Drinking Water had undertaken a review of this contaminant, and that any revision to lower the federal guideline would be followed by a Provincial consultation through the EBR on doing likewise.

In 2005, the MAC in the federal guidelines was lowered to 0.01 mg/L, further subject to the ALARA (As Low as Reasonably Achievable) principle. Health Canada acknowledges that while this MAC exceeds the health-based guideline of 0.003 mg/L, it balances relative risk with the treatment costs that would be required to achieve it.

Ontario's Standard for arsenic is now 2.5 times higher than the federal guideline. We hope that your Ministry will take appropriate action to lower this standard, giving full consideration to the health-based guideline of 0.003 mg/L, so that Ontarians can remain confident that their drinking water is as safe as can be reasonably expected. We look forward to a reply at your earliest convenience.

Yours truly,

ORIGINAL SIGNED

Linda Stewart,
Executive Director

Copy: Dr. George Pasut, Chief Medical Officer of Health (Acting)
Hon. George Smitherman, Minister of Health and Long Term Care

Encl.

2002 alPHa RESOLUTION NO. A02 – 6

TITLE: **Arsenic in Drinking Water**
SPONSOR: Council of Ontario Medical Officers of Health of alPHa

WHEREAS Arsenic is a known human carcinogen¹; and

WHEREAS Ontario has an Interim Maximum Acceptable Concentration (IMAC) of arsenic in drinking water of 0.025 mg/L ² since at least 1994³; and

WHEREAS the Government of Canada established an objective level for arsenic of less than or equal to 0.005 mg/L in 1978 ⁴; and

WHEREAS the National Research Council of the United States National Academy of Sciences has concluded that:

1. There is increasing evidence that chronic exposure to arsenic in drinking water may be associated with an increased risk of hypertension and diabetes,⁵ and
2. the **excess** cancer risk for bladder and lung cancers combined at arsenic concentrations in drinking water between 3 and 20 ppb are estimated to be between 9 and 72 per 10,000 people.⁶

NOW THEREFORE BE IT RESOLVED that the Association of Local Public Health Agencies (alPHa) urges the Government of Ontario to amend Regulation 459/00 under the Ontario Water Resources Act to set a Maximum Acceptable Concentration for Arsenic in drinking water of 0.003 mg/L.

¹International Agency for Research in Cancer

²Schedule 4, Ontario Regulation 459/00 as amended by O.R. 506/01 under the Ontario Water Resources Act

³Ontario Drinking Water Objectives (Revised, 1994), p. 10

⁴Guidelines for Canadian Drinking Water Quality 1978 , Supporting Documentation, p. 159

⁵Arsenic in Drinking Water: 2001 Update, p. 214

⁶Ibid., p. 223