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PROPOSED REGULATORY CHANGES
DRINKING WATER QUALITY MANAGEMENT STANDARD
UNDER THE SAFE DRINKING WATER ACT

The Transportation and Works Committee recommends the adoption of the recommendations contained in the following report, December 16, 2004, from the Commissioner of Transportation and Works:

1. RECOMMENDATIONS

It is recommended that:
1. Transportation and Works Committee and Regional Council, receive the attached November 9, 2004 staff comments in response to proposed Drinking Water Quality Management Standard under the Safe Drinking Water Act (2002).

2. Staff report back to the Transportation and Works Committee and Regional Council when the finalized Drinking Water Quality Management Standard has been released by the Ministry of the Environment.

2. PURPOSE

This report is to inform members of Transportation and Works Committee and Regional Council that the Canadian Standards Association (CSA) in conjunction with the Ministry of the Environment (MOE) has released a draft of the proposed Drinking Water Quality Management Standard (DWQMS) for comment.

Comments on the proposed DWQMS were submitted by the Director, Water and Wastewater in response to the call by the CSA and MOE (Attachment 1). The comments were required by November 12th, 2004 and there was insufficient time to report to Transportation and Works Committee and Regional Council in this regard.

3. BACKGROUND

In Part II of the Walkerton Report, Justice O’Connor made several recommendations regarding the potential for a harmonized quality management system for all drinking water systems. Specifically, Justice O’Connor recommended that ‘…The Ministry of the Environment should initiate the development of a drinking water quality management standard for Ontario. Municipalities, the water industry, and other relevant stakeholders should be actively recruited to take part in the development of the standard. The water industry is recognized as an essential participant in this initiative…’

The MOE has indicated that accreditation to the DWQMS by a third party auditor will be required as part of the pending ‘Drinking Water Licence’ framework. The ‘Drinking
‘Water Licence’ has been proposed to amalgamate all current approvals documents, including facility classification, drinking water system Approvals and Permits to Take Water, into one platform.

The CSA was contracted by the MOE to undertake the development of the draft DWQMS. The CSA Project Team has been working with a Core Team of water industry professionals and MOE staff to develop the processes and background material. The CSA is involved in the development of international standards, including the ISO 14001 Environmental Management Standard and the ISO 9001:2000 Quality Management Standard.

In October 2004, drinking water system stakeholders were asked to review a draft proposed DWQMS developed to date. A number of workshops were hosted by the CSA throughout late October and early November across the province to provide additional information to stakeholders regarding the proposed DWQMS. Written comments were also solicited until November 12, 2004. At this time, the MOE has not identified when the final version of the DWQMS will be legislated.

Currently, all of the drinking water systems operated by York Region are registered the ISO 9001:2000 Quality Management Standard.

4. ANALYSIS AND OPTIONS

The proposed DWQMS was reviewed by the Water and Wastewater Branch staff involved in the drinking water systems and quality management systems. It currently appears that the DWQMS as proposed has adopted many of the requirements of the current ISO 9001:2000 Quality Management Standard. As such, the Water and Wastewater Branch has a majority of the required documentation pre-established because of the registration of the drinking water systems to the ISO 9001:2000 standard.

The proposed DWQMS identifies the requirement for each drinking water system to develop operational plans that will require approval by the MOE. At this point in time, it is unclear as to the required content of the operational plans and how this document will be approved by the MOE, including an associated timeline. It is also unclear as to what implications surround a multi-tiered municipality and whether there will be a requirement for a harmonized operational plan between the tiers or whether each municipality will have to submit individual plans. Additionally, the proposed DWQMS operational plan currently requires the owner and/or operating authority to undertake an identification and evaluation of the ‘Critical Control Points (CCP)’ in the drinking water. The CCP methodology comes from food industry standards that require the identification of potential risks in any given process and the identification of controls that can be exerted to manage those risks.

The proposed DWQMS has identified the requirement for Senior Management of an organization to define the required resources for the drinking water system, including the
provision of infrastructure and human resources. It is unclear at this time whether the requirements for this provision will be in conjunction with the proposed Bill 175, the *Sustainable Water and Sewage Systems Act*. Currently, Bill 175 has received Royal Assent and there have not been any regulations released under the Act to date but it is expected to require reporting of full cost accounting for both water and sewage systems.

5. **FINANCIAL IMPLICATIONS**

It is unclear as to what the financial implications will be of the proposed DWQMS. It is still undetermined when Bill 133 will come into effect so funds have not been identified in the proposed 2005 budget.

Currently, a contract is tendered for the third party audit services for the ISO 9001:2000 programs. This contract is a three year contract providing semi-annual third party audit services, including a re-registration audit to the ISO 9001:2000 standard every three years. The current value of the contract is $9000 + GST, which is for a 3 year auditing cycle. It is anticipated that a similar cost will be incurred for the audit services required for accreditation to the proposed DWQMS.

Additionally, consulting services may be needed in conducting Critical Control Point analysis to address the requirements of the operational plan. An estimate for this type of analysis, per system, is between $10,000 and $15,000 depending on system complexity. Therefore, total cost to the Region could be in the order of $150,000 to $200,000 for initial consulting services plus $10,000 annually for audit services.

6. **LOCAL MUNICIPAL IMPACT**

As a multi-tiered organization, it is unclear at this point in time how the proposed DWQMS will affect the local municipalities. It is highly likely that each local municipality will be required to be accredited to the DWQMS independently of York Region drinking water systems.

The provincial requirement for accreditation will be a significant undertaking for the local municipalities and may stress local resources, both human and financial.

7. **CONCLUSION**

Currently, York Region Water and Wastewater Branch is in a good position with respect to the proposed DWQMS. The implementation, registration and maintenance of the current ISO 9001:2000 programs for the drinking water systems will be an excellent building block for the proposed DWQMS.

The Senior Management Group has reviewed this report.

*(The attachment referred to in this clause is attached to this report.)*