

**RECOMMENDATIONS AND RATIONALE**

**CONCERNING**

**STANDARDS, TECHNOLOGY AND  
SMALL SYSTEMS**

**(FOR WALKERTON INQUIRY, PART II,  
PUBLIC HEARING NO. 6)**

**BY**

**OPSEU**



**SEFPO**

**AUGUST 2001**

1. The Ontario Public Service Employees Union (OPSEU) is very pleased to be able to continue its involvement in Part II of the Walkerton Inquiry by offering brief submissions and recommendations in respect of Public Hearing No. 6. OPSEU will confine its submissions to advocating for strong and effectively organized provincial government leadership in the production of drinking water standards.
2. Concerning “standards”, we have identified three types of “standards” requiring attention:
  - i. Standards for drinking water quality;
  - ii. Drinking water provider organizational quality standards; and
  - iii. Drinking water treatment plant operator certification and training standards.

It is our understanding that only the first type of “standards” will be addressed in Public Hearing No. 6, and that the latter two types of “standards” will be the subject of discussion in Public Hearing 7 and 8.

3. OPSEU wishes to comment on the role of the Ministry of the Environment and, to some extent, the Ontario Clean Water Agency, in the process of producing drinking water standards. The general points that OPSEU wishes to advance concerning those two entities have already been the subject of earlier submissions. Specific detailed comment is contained in OPSEU’s submissions to Public Hearing No.1 under the heading “Recommendations 7 and 8: re-alignment of the Ministry and the Ontario Clean Water Agency to better serve the public interest in safe drinking water”, at pages 18 to 30, and in the OPSEU paper “Public Interests in Water Facilities Operations” under the heading “Operational Expertise for Policy-makers and Regulators” at pages 18 to 20. OPSEU will rely on those submissions at Public Hearing No.6, although a brief summary of those submissions is also set out below.
4. The setting of standards is an exercise in the public determination of risk. It involves judgments that must be made in the public interest. Public input should be welcomed and facilitated. Industry input should also be an integral part of the process. However, industry standard setting is not an option. Standard setting must be done by government. The public service should be utilized to give the necessary advice. Choices must be made by those directly accountable to the public.
5. Provincial decisions on drinking water standards must be supported by an effective provincial government organizational structure. The proposed Ministry of the Environment Water Branch should be the location for standards development. That development must occur on the basis of operational knowledge. One important source of such knowledge would be

information provided, under a revised Memorandum of Understanding, by the Ontario Clean Water Agency.

6. Front line staff represented by OPSEU have extensive and detailed comments to make about the content of drinking water standards. That input should occur as part of the standards setting process.
7. Based on these submissions, OPSEU makes the following recommendations:

**Recommendation #1:**

- **The development of drinking water standards is a function to be carried out by the provincial government; and**
- **Organizational responsibility for that function should reside in the Water Branch of the Ministry of the Environment.**

**Recommendation #2:**

- **Drinking water standards development must occur on the basis of operational knowledge; and**
- **The Memorandum of Understanding of the Ontario Clean Water Agency should be revised so that OCWA can play an appropriate and important role in the provision of such operational knowledge.**