

Ottawa Riverkeeper's Comments on the Status of PFAS in Canada

July 19th, 2023

About Ottawa Riverkeeper and PFAS

Ottawa Riverkeeper, a Canadian charity, is a champion and collective voice for the Ottawa River watershed, providing leadership and inspiration to protect, promote, and improve its ecological health and future. We inspire action and collaboration in order to achieve a healthy Ottawa River in which every person can safely swim, drink, and fish.

As an organization dedicated to preserving and protecting the quality of water in our watershed, Ottawa Riverkeeper would like to express our deep concern regarding the presence of per- and poly-fluoroalkyl substances (PFAS) in the environment.

PFAS contamination has emerged as a significant environmental and public health issue due to their extreme persistence and their potential for bioaccumulation. Ottawa Riverkeeper believes it is important to take immediate action to mitigate the detrimental effects of these substances on ecosystems and human health.

PFAS have been widely detected in the environment, in human bodies, and in water sources including rivers, lakes, and coastal areas. As they do not break down in the environment and can move through soils to contaminate and bioaccumulate in fish and wildlife, we are concerned about the potential long-term consequences that these persistent chemicals may have on aquatic life and ecosystems, as well as human health. The bioaccumulation of these chemicals in the food chain directly impacts the health and the survival of wildlife, compromising the biodiversity essential to the planet's ecological balance.

Other jurisdictions, including the US, have been more actively involved in tackling PFAS contamination. We are glad to see that the government of Canada is addressing this issue by collecting comments to be considered when developing the final PFAS report and risk management approach. Ottawa Riverkeeper has assembled a series of four recommendations that the government must act on in order to establish a strong position on PFAS and properly safeguard the health of Canadians and our environment.

Ottawa Riverkeeper's recommendations

As part of Health Canada and Environment and Climate Change Canada's review of PFAS in Canada, Ottawa Riverkeeper offers the following recommendations and actions to be included in the final risk management approach.

1. **List PFAS as a class of toxic chemicals under CEPA:** Canada must adopt a proactive and precautionary approach by addressing PFAS as a class of chemicals which are toxic to the environment and/or harmful to human health as set out in CEPA, and providing the associated performance measurement tools and evaluation this requires.
2. **Track PFAS contamination:** Canada must fully implement reporting and data collection tools to track and minimize environmental and human exposure to PFAS including their addition to the National Pollutant Release Inventory (NPRI) reporting requirements.
3. **Invest in testing and mitigation:** Canada must provide the necessary investment in the tools to test for, identify areas of concern, and develop action plans to mitigate PFAS contamination, especially for areas which impact drinking water sources or have a potential for consumption through bioaccumulation in food sources.
4. **Align with the steps taken in other jurisdictions:** Under the Great Lakes Water Quality Agreement (GLWQA), Canada and the US have agreed to protect human health and the environment through cooperative and coordinated measures to reduce the release of chemicals into the waters of the Great Lakes. In 2021 the US EPA (Environmental Protection Agency) provided a PFAS Strategic Roadmap and recently opened a review process regarding the potential future designations of PFAS under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (US EPA, 2023). Canada should ensure that the approach taken for PFAS meets or exceeds those in other jurisdictions like the US.

Conclusion

PFAS contamination is a known and growing threat. Proper mitigation techniques are necessary to safeguard the health of Canadians and our environment. The Government of Canada has the opportunity to not only match the commitments made by other jurisdictions (such as the US) but to be a global leader in protecting ecosystems from these toxic substances.

The current review suggests the issue is being taken seriously, and it is Ottawa Riverkeeper's belief that clear, direct, and effective government action can emerge from this consultation process. By properly listing these substances as toxic, tracking contamination, investing in testing and mitigation, and matching the steps taken by other leaders on this issue, Canada can set an example in water, health, and environmental protection.