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Olivier Berreville
Canadian Council of Ministers of the Environment
360 - 123 Main Street
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Comments sent via email: oberreville@ccme.ca

RE: Consultation: Draft Canadian Water Quality Guidelines for the Protection of Aquatic Life: Perfluorooctanoic Acid

On behalf of Ontario's more than 3,000 environment and cleantech firms, the Ontario Environment Industry Association (ONEIA) is writing to provide our response to the Consultation: *Draft Canadian Water Quality Guidelines for the Protection of Aquatic Life: Perfluorooctanoic Acid* as posted at https://ccme.ca/uploads/DRAFT%20PFOA%20CWQG%20Factsheet_EN_for%20public%20review.pdf, and opened on October 19, 2023 (here after referred to as the PFOA Guideline).

Ontario is home to Canada's largest group of environment and cleantech companies. The most recent statistics from the federal government show that Ontario's environment sector employs more than 226,000 people across a range of sub-sectors. This includes firms working in such diverse areas as materials collection and transfer, resource recovery, composting and recycling solutions, alternative energy systems, environmental consulting, brownfield remediation, and water treatment – to name just a few. These companies contribute more than \$25-billion to the provincial economy, with approximately \$5.8-billion of this amount coming from export earnings.

ONEIA members are committed to engaging with governments as they develop policies and regulations that are consistent with our principles of sound science, a sound environment, and a sound economy.

ONEIA would like to thank the Canadian Council of Ministers of the Environment (CCME) for the opportunity to review and provide comments on the PFOA Guideline. Per- and polyfluoroalkyl substances (PFAS) is an area of great interest to our member companies and we are eager to collaborate with government on a practical approach to mitigate environmental and human health impacts of PFAS. ONEIA's PFAS Committee has solicited comments from interested members and is happy to provide the feedback included in Table 1 below.

Table 1. ONEIA Comments on the PFOA Guideline	
No.	Comment
1	With a short-term benchmark of 93,800 µg/L and long-term guideline of 73.4 µg/L, and recognizing the maximum concentration of PFOA observed at contaminated sites in Canada to date is 11.3 µg/L (Moody et al. 2002, per line 69 of the PFOA Guideline), we acknowledge that freshwater aquatic life will likely not be a driver for PFOA remediation in Canada.
2	We recognize that the short-term benchmark is based on short-term (48 to 96 hr) tests, and the high number reflects that adverse effects associated with exposure to PFOA (and other PFAS) tend to be driven by long term exposure. We also note that the long-term benchmark is based on 4 to 42 day testing. Why was this chosen as the relevant long-term time frame, given species exposure can occur for much longer periods of time?
3	If the maximum observed concentration of PFOA at contaminated sites in Canada is 11.3 µg/L, shouldn't the potential for chronic impacts at this concentration be assessed? Or was that considered in the selection of the benchmark values?
4	We note the PFOA Guideline contains several incomplete sentences and statements that are not backed with detailed data or relevant scientific information.
5	Given the ubiquitous presence of PFAS in the environment, their detrimental effect on aquatic life, human health, and the environment in general, and the many challenges associated with the sampling, testing and determining appropriate criteria, ONEIA would like to remind CCME, and other government agencies, that advancing policy directed towards limiting the use of PFAS remains an important action. Source reduction should remain a primary concern for the CCME, other government agencies, and the industry when addressing PFAS concerns and contaminations. We also note expertise is available in the industry through ONEIA's membership to support reducing exposure and the release of PFAS into the environment, and policy directed towards these actions should also be prioritized.

ONEIA appreciates the opportunity to provide our comments and suggestions on the PFOA Guideline. We want to reiterate that we are eager to work with the Government of Canada, CCME, and other areas of the government to advance a practical approach to mitigating the environmental and human health impacts of PFAS and we look forward to being engaged in future discussions and consultations. We welcome the opportunity to discuss our position and recommendations further. Please contact our office at info@oneia.ca or at (416) 531-7884 should you have any questions.

Sincerely,



Krista Barfoot
Chair, PFAS Committee
ONEIA



Michelle Noble
Executive Director
ONEIA