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24, rue Clarence Street,
Ottawa, Ontario, K1N 5P3

T. 613-241-5221
F. 613-241-7440

www.fcm.ca

September 21, 2017

The Honourable Judy A. Sgro, P.C., M.P.
Chair
House of Commons Standing Committee on Transport,
Infrastructure, and Communities
Sixth Floor, 131 Queen Street
House of Commons
Ottawa, Ontario
K1A 0A6

The Federal Government's role in lead pipe infrastructure in Canada

Dear Ms. Sgro:

Thank you for the opportunity to present comments on the House of Commons Standing Committee on Transport, Infrastructure and Communities' study of the issue of lead in drinking water.

The provision of safe drinking water is of the utmost importance to our members. Municipal water utilities work every day to ensure that Canadians can have confidence in the quality and safety of public tap water.

Municipalities are aware of the issues associated with legacy water infrastructure containing lead and have been working proactively to replace lead service lines for many years. Municipalities have developed comprehensive lead service line replacement programs. A partial list of municipalities with lead line replacement programs includes: Brandon, MB; Brantford, ON; Gatineau, QC; Guelph, ON; Halifax, NS; Hamilton, ON; London, ON; Montreal, QC; Ottawa, ON; Regina, SK; Saskatoon, SK; St. Thomas, ON; Thunder Bay, ON; Toronto, ON; Welland, ON; and Winnipeg, MB.

FCM is not aware of a reliable national estimate of the number of lead service lines still in use in Canada today. Generally, given the age of infrastructure across the country, the issue is larger in Eastern Canada. Cities such as Vancouver and Lethbridge have successfully replaced all lead service lines in previous decades. Edmonton and Calgary have programs in place to replace the few remaining lead service lines in those cities. Meanwhile, in 2012 Toronto estimated that there were 65,000 lead service lines in use in the city. Halifax estimates that there are about 10,000 private lead services lines remaining in that city.

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A significant part of the challenge of replacing lead water pipes is the division between public and private infrastructure. Responsibility for lead service lines (the pipes connecting municipal water mains to private homes, businesses and institutions) changes from the municipality to the property owner at the property line. Currently, municipalities do not have the legal ability to compel property owners to replace their portion of the lead service line.

Municipalities have been proactive by notifying property owners when the municipal water infrastructure on their street will be replaced, and many municipalities offer various financing programs to help property owners cover the upfront cost of replacing the private portion of the line. While costs vary between communities and the local context of each replacement, it generally costs \$5,000 to replace the private portion, and \$10,000 to replace the public portion, of a lead service line.

FCM has long called on the federal government to partner with municipalities to collectively tackle Canada's aging public infrastructure. In March, when the federal government tabled Budget 2017, FCM and our member municipalities congratulated the government for making historic investments in public infrastructure. By supporting on-going efforts to upgrade aging water infrastructure, Phase 2 of the federal government's Investing in Canada Plan can help municipalities continue to replace lead service lines. FCM encourages the federal government to ensure that lead service line replacement is an eligible cost under Phase 2 federal infrastructure programs. Municipalities are looking to Phase 2 funding to address a wide range of water infrastructure priorities, including compliance with the federal Wastewater System Effluent Regulations (WSER) at an estimated cost of \$18 billion, upgrading combined sewer systems and making water infrastructure more resilient to climate change. Scaling up the pace of lead line replacements will require additional federal funding, over and above the dollars committed to water and wastewater in Budget 2017.

Finally, FCM also encourages the Committee to consider how costs for replacing private lead service lines are allocated, and to look at options for new and innovative approaches to help property owners with the cost of replacing their portion of lead service lines.

Thank you for taking the time to study this important issue. Please contact Hardave Birk at hbirk@fcm.ca should you have any questions, or if we can be of further assistance in your review.

Yours sincerely,



Jenny Gerbasi
Deputy Mayor, City of Winnipeg
FCM President