

Ottawa Riverkeeper's Comments on the Updated State of per- and poly-fluoroalkyl substances (PFAS) Report and the Revised Risk Management Scope for per- and poly-fluoroalkyl substances (PFAS) in Canada

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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.

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.

Ottawa Riverkeeper previously commented on the Draft State of PFAS Report (May 2023) and we remain deeply concerned regarding the presence of per- and poly-fluoroalkyl substances (PFAS) in the environment. The comments we are submitting today to the Updated State of per- and poly-fluoroalkyl substances (PFAS) Report and the Revised Risk Management Scope for per- and poly-fluoroalkyl substances (PFAS) in Canada build upon those comments (included below) and consider the presence and monitoring of these contaminants within freshwater ecosystems.

Summary of Previous Comments

In July 2023, Ottawa Riverkeeper submitted comments expressing our concerns regarding the widespread presence and persistence of per- and poly-fluoroalkyl substances (PFAS) in the environment. We emphasized the significant ecological and public health risks posed by PFAS, particularly their ability to bioaccumulate in wildlife and move through ecosystems, compromising biodiversity and human health.

Our previous comments outlined four key recommendations to strengthen Canada's position on PFAS management:

1. **List PFAS as a toxic class under CEPA:** We called for a proactive, precautionary approach to addressing PFAS as a class of toxic chemicals harmful to both the environment and human health, supported by performance measurement tools.
2. **Track PFAS contamination:** We recommended that Canada fully implement reporting and data collection tools, including adding PFAS to the National Pollutant Release Inventory (NPRI) to track and minimize exposure.
3. **Invest in testing and mitigation:** We highlighted the need for increased investment in tools for testing, identifying areas of concern, and developing action plans to mitigate PFAS contamination, especially in drinking water and food sources.
4. **Align with international standards:** We emphasized the need for Canada to meet or exceed standards set by other jurisdictions, such as the U.S., under agreements like the Great Lakes Water Quality Agreement (GLWQA).

Additional Comments and Areas of Concern

Expanding how Hot Spots are identified

From 2013 to 2020, the Government of Canada monitored PFAS concentrations at 29 sites across Canada, excluding Alberta, Prince Edward Island, and the Territories. PFAS were detected in the surface waters of every province where samples were taken. While this monitoring did not target specific industrial releases, it underscores the widespread presence of PFAS.

There are over 100 federal contaminated sites with confirmed or suspected PFAS contamination, predominantly related to aqueous film-forming foam (AFFF) use typically due to activities associated with fighting fuel fires. This includes training activities and maintenance of

firefighting equipment at airports and military facilities. However, restricting hot spot identification to federal sites omits other significant PFAS sources, such as industrial effluent.

Limiting PFAS-contaminated sites to federal sites dismisses other sources of PFAS, such as effluent from industrial activities. Ottawa Riverkeeper recommends that the other sources of PFAS be considered when identifying potential hot spots. These sites can be identified through data available in the National Pollutant Release Inventory, identifying industrial activity which may include PFAS in their production, or through data provided to ECCC as part of licensing agreements. This would also ensure that various sources of PFAS contamination are considered.

Exclusion of Fluoropolymers

The updated report recognizes PFAS as a class meeting toxicity criteria under the Canadian Environmental Protection Act (CEPA). However, we are deeply concerned by the exclusion of fluoropolymers from the PFAS class in the Updated Draft Report, as these chemicals were previously included in the 2023 Draft Report. The updated draft also does not provide sufficient evidence on the environmental and human health impacts of fluoropolymers across their life cycle (production, use, disposal).

Rather than removing fluoropolymers from the PFAS classification prematurely, we urge the government to adopt a precautionary approach. Fluoropolymers should remain classified with other PFAS as toxic until comprehensive research and risk assessments are completed. Such measures would ensure appropriate protections are applied based on evidence from future studies.

Conclusion

PFAS contamination is recognized as a threat to human and ecosystem health. Adequate regulatory and mitigation strategies are essential for safeguarding Canadians and our environment. Ottawa Riverkeeper strongly advocates for listing PFAS (including fluoropolymers) as toxic substances under CEPA, expanding monitoring efforts, investing in mitigation technologies, and aligning with international best practices to protect water quality and ecological integrity.