



North American Metals Council
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September 18, 2016

Via On-line Submission

Ms. Heather Granger
Water Quality Research Specialist
BC Ministry of Environment
Victoria, BC, Canada
V8W 9M2

Re: August 10, 2016, Source Drinking Water Quality Guideline Update

Dear Ms. Granger:

The North American Metals Council (NAMC)¹ is pleased to submit comments in response to the British Columbia (BC) Ministry of Environment (MOE) August 10, 2016, draft updated Source Drinking Water Quality Guideline (SDWQG) for selenium. NAMC is a leading voice for the metals industry on science- and policy-based issues affecting metals, and has been an active participant in selenium science policy issues. Our organization has worked closely with U.S. federal and international agencies to address risk assessment issues that are unique to metals at various stages of their life cycle -- sourcing, production, engineering, use, recycling, and recovery. We advocate policy based on good and technically-defensible science. NAMC does not engage in lobbying activities.

The comments outlined in the appended Excel spreadsheet, which will be submitted on-line consistent with the instructions on the MOE website, comprise integrated comments provided by individual Members and Associate Members of the North American Metals Council-Selenium Work Group (NAMC-SWG). The NAMC-SWG is engaged in technical research on selenium issues. Activities include: the development of water quality tissue-based standards for selenium, the implementation of such standards, development of effects thresholds, and the identification of analytical methods pertinent to such standards. As

¹ NAMC is an unincorporated, not-for-profit group formed to provide a collective voice for North American metals producers and users (*i.e.*, the North American “metals industry”) on science- and policy-based issues that affect metals in a generic way. NAMC members include trade associations as well as individual companies.



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part of its on-going efforts, the NAMC-SWG develops papers on these topics and shares them publicly.

As noted in the comments, the NAMC-SWG fundamentally supports the use of scientific rationale for justification in the development of water quality guidelines, as opposed to the application of a precautionary principle. NAMC-SWG is concerned, however, that the proposed MOE selenium guidelines do not conform to specific MOE policy standards, specifically, that there is insufficient scientific rationale provided with the updated selenium SDWQG, and the draft updated selenium guidelines do not conform to the two approaches for developing ambient water quality guidelines in BC (see footnote in spreadsheet). It appears the updated draft retains the 1992 Health Canada drinking water guideline, but offers no technical rationale as to why. This is particularly concerning, given that Health Canada issued a revised guideline value in 2014 and the reality that the proposed, overly-protective provincial drinking water guideline will adversely and unnecessarily affect the BC economy with no additional benefits to human health.

Further details on the NAMC-SWG concerns and suggested edits are included in the appended reviewer table.

Thank you for the opportunity to comment.

Sincerely,

Kathleen M. Roberts
Executive Director, NAMC

Guy Gilron
Associate Member & Co-Chair, Canadian Council
of Ministers of the Environment (CCME) Guideline
Development Subcommittee

Attachment