

COMMUNITY CARE FACILITIES LICENSING PROGRAM

Introduction

Section 48(5) of the Child Care Licensing Regulation requires a Licensee to ensure that safe drinking water is available to children. Lead may be ingested from many sources such as food, soil, paint, dust and water. Even low levels of lead may be harmful to the brain development of infants and children. Children are more vulnerable to the harmful effects of lead than adults are. Licensees must take steps to reduce children’s exposure to lead from all sources, including drinking water. Health Canada set a Maximum Allowable Concentration (MAC) of lead in drinking water at 0.005mg/l; however lead levels should be kept as low as reasonably achievable (ALARA) as there is no known safe exposure level to lead.

Testing

During the spring of 2020, Island Health participated in a project to support the directive by the Ministry of Health and Provincial Health Officer to test the lead levels in the drinking water of all licensed child care facilities. This project was completed in May 2020, and as a result, facilities with lead over the MAC are required to submit a Corrective Action Plan (CAP) to ensure the health and safety of children in care.

A Licensee must conduct initial water quality test for lead, in order to receive a licence, and complete regular lead testing as directed by the Community Care Facilities Licensing Program. Some Licensees may also wish to conduct additional testing when remedial work or upgrades to the plumbing are completed at the facility. To conduct testing at your facility, Licensees can use any accredited lab of their choosing at <http://www.caladirectory.ca> or <https://www.scc.ca/en/accreditation> with a Scope of Accreditation specific to lead. Please note, Bureau Veritas (BV) Labs is located on Vancouver Island and can be reached at customersolutionswest@bvlabs.com.

Instructions for Stagnant and Flush Testing

Licensees must collect two samples from at least one tap located at the facility. Licensees may also choose to test more than one location. Only water tested at these locations will be permitted for use as drinking water.

Testing at each location requires the submission of two separate 250ml sample bottles, one taken after a minimum of eight hours of no use (stagnant sample) and another sample taken after a two-minute flush (flush sample).

Testing stagnant and flush samples may allow you to operate with a CAP which includes flushing water each day before operating, rather than using other alternatives such as bottled water, filters, or remedial plumbing work.

Any accredited lab will assist you with both the lead in water testing process and with pricing information. The lab can ship sample bottles or depending on the lab you have chosen, pick up locations may be available around Vancouver Island.

Results

If your lead levels are above the MAC, you will be required to submit a CAP to Licensing to address the levels of lead in your water. This plan must address how children in care will not be exposed to harmful levels of lead from any source, including water used for drinking, cooking, brushing teeth, or any other activity where water may be consumed. Your Licensing Officer will assess the CAP at each routine inspection to ensure the health and safety of children in your care. You may submit an updated CAP at any time, if your plan to address the concentration of lead in the water changes.

Victoria	Nanaimo	Courtenay	Campbell River
201 – 771 Vernon Avenue	29 – 1925 Bowen Road	355 – 11 th Street	200 – 1100 Island Highway
Victoria, BC V8X 5A7	Nanaimo, BC V9S 1H1	Courtenay, BC V9N 1S4	Campbell River, BC V9W 8C6
Ph: 250.519.3401	Ph: 250.739.5800	Ph: 250.331.8620	Ph: 250.850.2110
Fax: 250.519.3402	Fax: 250.740.2675	Fax: 250.331.8596	Fax: 250.850.2455
Website: Community Care Facilities Licensing			

Corrective Action

Each facility is unique and may have multiple options to consider when submitting a corrective action plan to address contraventions to legislation. The facility should consider their unique infrastructure, population, staffing, and the feasibility of any plan submitted to Licensing. The following solutions may be helpful when submitting a plan to address unacceptable concentrations of lead in drinking water:

- Two minute flush of water after every period of six or more hours of no water use prior to operation (for facilities with lead levels below the MAC in flush samples);
- Filtration systems (carbon-based, reverse osmosis or distillation type filters that are certified to the NSF international standard for removing lead are effective) – see link below;
- Replacement of specific plumbing fixtures or components (lead may be concentrated in an old faucet for example). You may wish to consult with a water treatment company before completing any upgrades at the facility;
- Replacing lead service lines to the water supply. Contact your local government to find out if any programs exist in your community to replace service lines;
- Use of bottled water rather than tap water;
 - If Licensees choose bottled water as a corrective action plan, the plan must clearly identify all uses of water including drinking, food preparation and oral hygiene as mitigating factors; and
- To ensure lead levels have been addressed, re-testing must be completed when
 - A CAP includes a longer flush period than initially tested;
 - Sampling errors are suspected or identified; and/or
 - Facility updates, such as installation and/or use of filters, has been completed.

Questions

If you need assistance in understanding and interpreting test results, please contact the accredited lab that you have chosen to conduct lead in water testing. If you have questions regarding options to reduce lead levels, please contact your Licensing Officer.

Resources

- List of Accredited Labs: <https://www.scc.ca/en/accreditation> and <http://www.caladirectory.ca/>
- Government of British Columbia (2017). BC Health Files: *Lead in Drinking Water* https://www2.gov.bc.ca/assets/gov/health/about-bc-s-health-care-system/child-day-care/fact_sheet_-_lead_in_drinking_water_2017.pdf
- Government of British Columbia (2019). HealthLinkBC File Number 49e: *Lead in Drinking Water* <https://www.healthlinkbc.ca/healthlinkbc-files/lead-drinking-water>
- Government of Canada (2019). *Guidelines for Canadian Drinking Water Quality: Guideline Technical Document – Lead* <https://www.canada.ca/en/health-canada/services/environmental-workplace-health/reports-publications/water-quality/guidelines-canadian-drinking-water-quality-summary-table.html>
- Island Health (2020). *Lead in Water* <https://www.islandhealth.ca/learn-about-health/drinking-water/lead-water>
- NSF certified lead reduction filters: <https://www.nsf.org/newsroom/concerned-about-lead-drinking-water-choose-filter-certified-to-reduce-lead>