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Presentation to Executive Committee, Sept. 17, 2023

1. INTRODUCTION

Health Canada advises there is no safe level of lead, and it should at the very most not exceed 5 micrograms per litre (µg/L) for safe drinking water. They state: “The toxicity of lead has been extensively documented in humans, based on blood lead levels (BLLs). Effects that have been studied include reduced cognition, increased blood pressure and renal dysfunction in adults, as well as adverse neurodevelopmental and behavioural effects in children.”

So far in 2025, 71% of 54 homes tested exceeded the safety standard. This includes several results of over 100 µg/L, and one as high as 570 µg/L, which is 114 times higher than Health Canada’s upper limit of 5 µg/L.

2. THE LSC PROGRAM REPORT

Recommendation 1: *Direct administration to submit an LSC report to Council at minimum every year.*

Rationale: Given the serious risks of lead exposure, today’s LSC report has been long awaited. It contains an important summary of progress. As well, the administration shares its data with our group, allowing us to gain a more granular picture of testing results and impacts by neighbourhood.This transparency is valuable for planning. Publicly presenting the report to Council gives people a chance to share knowledge and ideas. Information is gathered throughout the year, but is only shared with Council once every two years, which isn’t enough for a program that’s critical to our daily health and wellbeing.

3. PRIVATE-SIDE REPLACEMENT FINANCING PROGRAM

Recommendation 2: *Approve the proposed changes to the financing program, and extend eligible expenses to include ancillary property damage.*

Recommendation 3: *Conduct a review of the financing program’s future, with a view to adding cost-sharing elements and inflationary protection for future applicants.*

Rationale: We agree there were too many barriers to accessing 10-year financing, and the admin fee was an unfair imposition. The report’s proposed changes make sense. Based on community feedback, we request eligible expenses be extended to porches, stairs, private sidewalks, and other home infrastructure damaged during the removal. This may be an opportunity to introduce some cost-sharing, as Saskatoon has done. We’re also worried about the program’s future value, as inflation generates an inequity for people whose road work may not be done until far into the future.

4. FILTER PROGRAM

Recommendation 4: *Support the proposed expansion of the filter program, and consider further increasing its budget in future years. At the same time, reduce the time houses are on filters by pursuing timely, targeted LSC removals.*

Recommendation 5: *Increase face-to-face interactions with families at risk who have not accessed filters or replacement water, potentially coordinated with helping agencies, health centres, schools, and other community supports.*

Rationale: The administration has done a good job of finding ways to expand filtration options, responding to the frustrations people encountered with the small pitchers. The proposed subsidies for purchased water, under-sink filters and larger pitchers provide improved choices for busy families.

Filtration uptake has improved, with 27% of addresses covered in 2024 and 22% so far in 2025, compared to 13% in 2022, and the distribution is more equitably dispersed than in the past, with outreach to more neighbourhoods. But still too many homes remain unprotected. For the most part, residents have to proactively reach out to the City for help, but for a variety of reasons many don't.

We've been working hard to spread information on lead through tabling at events, submitting stories to community newsletters, and holding teach-ins. City staff participate in our public forums and also table at community events. I'm sure they agree one-on-one conversations work the best, though it can be hard to connect with the most at-risk families. Perhaps more conversations could be facilitated if the City shared concerning test results with helping agencies, schools or health centres that may be in contact with impacted households.

5. PUBLIC WATER DISTRIBUTION

Recommendation 6: *Explore and report back on involving schools and community centres in clean water distribution.*

Rationale: In the U.S., free water distribution has been an important part of lead mitigation until pipes are replaced. Expanding the subsidy to purchased water is a good idea. Another resource is our own City water that hasn't gone through lead pipes. Thankfully, our schools enjoy lead-free water. We suggest the City approach the school boards to set up a plan for schools to act as free water distribution outlets in affected neighbourhoods. Students' families would be welcomed and encouraged to fill up larger five-gallon jugs on school property, for free. Parent volunteers could help coordinate distribution on designated 'Water Days,' and assist delivery for those without transportation. The cost to schools could be rebated via their water bills, based on a tally of gallons dispensed. Similar services could be offered out of neighbourhood centres, presuming their water is also lead-free.

6. HEALTH AND ENVIRONMENTAL JUSTICE

Recommendation 7: *Include social determinants in the prioritizing of LSC removals. Put LSC removals in the front seat, not the back seat, of road repairs.*

Rationale: It's good to see the administration has articulated a strong statement on environmental justice and the elemental sacredness of water. These concepts need to be central to planning. Safe drinking water is a UN-recognized human right. The courts have affirmed Indigenous rights to clean water. Canada's Constitution Act affords "essential public services of reasonable quality to all Canadians."

Despite this, thousands of Regina's residents, including some 10,500 children, don't have equitable access to safe drinking water. This is an inequity tied to other inequities, which together spell unjust higher risk of exposure to harmful levels of lead.

Looking at Regina's 12 residential (excluding Ross Industrial) neighbourhoods with LSCs:

- The averaged after-tax median household income is $59,409, compared to $76,500 for Regina as a whole.
- The community with the highest Indigenous representation, North Central (22% *v.* 11% for Regina as a whole), is also the neighbourhood with the greatest number of LSCs (547).
- In the 12 neighbourhoods, some 30% are immigrants and Non-Permanent Residents (NPRs), compared to 23% for Regina. The community with the highest representation, Heritage (51%), is also home to the third-highest number of LSCs (444).
- About 15% of residents in the affected neighbourhoods are senior citizens, compared to 6.6% for Regina as a whole. Seniors exposed to lead are at greater risk of early onset dementia, among other health impacts.

Currently, LSC removals are triggered by other scheduled road repairs, or by private homeowners who have the funds to initiate a private-side replacement. This can cause inequities to grow more entrenched, as the people least able to protect themselves from exposure by other means may end up waiting years for LSC removals.

7. RENTAL PROPERTIES

Recommendation 8: *Put a targeted focus on getting rental properties off lead, as the most vulnerable families are likely to be renters. Introduce consequences that compel landlords 1) to share information with tenants and 2) to take protective measures on their tenant's behalf.*

Rationale: About half of the homes in the affected neighbourhoods are rented, compared to 34% for Regina as a whole, meaning a significant number of people don't have control over their drinking water infrastructure. The three lowest-income communities, Downtown ($28,600 median after-tax household annual income), Centre Square ($40,000) and Heritage ($47,200), also have the highest proportion of rented dwellings, at 84%, 83% and 68% respectively.

We've heard from the community that the annual letters and test results are often addressed to landlords instead of tenants. We've heard about landlords throwing out letters. To our knowledge, there's nothing requiring landlords to share information with tenants, or to take mitigation steps on their behalf. There should be, with an enforcement mechanism.

8. TESTING

Recommendation 9: *Increase testing with a focus on high-risk populations. Have a removals triage system in place for homes known to have exceedances, ranked by level of severity.*

Rationale: The number of homes tested is quite small, just over 2% of homes connected to city-owned LSCs annually, meant as a representative sampling. The argument against more widespread testing is that if a home is on an LSC, the City doesn't need a test to know the water is likely contaminated. But testing can trigger extra intervention, like a filter drop-off, for example, so it still matters to residents, particularly in at-risk communities. Currently, high results don't trigger LSC removals, though.

For context, in Flint, Michigan, when one household had a single tap sample showing 104 µg/L, it was the factor that prompted the city to shut down water to the whole area, declare a state of emergency, and call in the National Guard to distribute water from trucks. Here in Regina, 20 homes have met or exceeded that level since random testing began in 2017.

Since 2017, Flint (pop. 80,000) replaced all 11,000 of its LSCs, in the same amount of time it has taken Regina to remove about 1,500 LSCs. In Newark, NJ, when tests revealed lead levels at 20 to 27 µg/L – a not uncommon level in Regina – the city vowed to remove its 18,000 lead lines within 24 to 30 months at no cost to residents.

In the U.S., where there are greater legal consequences and courts tend to side with citizens, above-limits test results prompt swift action on removals. Here, testing is mainly for study purposes and to meet SWA requirements, rather than as an action prompt. Consequently, some homes known to have very high exceedances as far back as 2017 are still on city-owned LSCs, eight years later. More generally, testing reveals important information about the scope of the problem. When consistently over half of homes tested annually have exceedances, as is the case in Regina, that information should be used as a rationale to speed up removals overall.

9. REMOVAL TIMELINE

Recommendation 10: *In the coming year, ask the administration to prepare financing options and resource capacity needs for a greatly accelerated LSC removal plan.*

Rationale: The longer we wait, the more corroded and dangerous the LSCs become, and the more expensive the cost of replacement grows. In the latest data, there are now staggering results of over 500 µg/L. Keep in mind the safety standard is 5 µg/L.

A North Central home that had a sample showing 626 µg/L in 2023 is still on a city-owned LSC, leaving residents to battle off severe contamination with filters, although Brita's certified filters are only tested on concentrations of 150 µg/L. The record shows polyethylene plumbing on the private side, which means the City is wholly and unquestionably responsible for the contamination that threatens their health.

The record shows another North Central home with a test sample at an astounding 1,801 µg/L. The connection was replaced, but it leaves a disturbing question in the air. Knowing only a few houses are tested annually, It is very possible there are families out there right now consuming water at extremely unsafe levels, even over 1,000 µg/L, unawares.

This Council has inherited a grave problem that demands rapid action. Compared to other North American cities, Regina got a late start and set annual removal targets too low and slow, drawn out over 15 years. LSCs were considered an add-on to regular road repairs, instead of an urgent public health risk endangering thousands of residents.

When the 15-year timeline was established, it was with a promise that it would be regularly revisited. So far, this hasn't happened. Meanwhile, cities like Saskatoon have already removed almost all their LSCs. A new Council can offer a fresh look at how the plan can be improved and accelerated.