



Ontario Dental Association
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Mr. Lou DiGironimo
General Manager, Toronto Water
Toronto City Hall
24th Floor East Tower
100 Queen Street West
Toronto, ON M5H 2N2
Email: pwic@toronto.ca

October 22, 2015

RE: Proposed Revisions to *Municipal Code Chapter 681 – Sewers*, Pollution Prevention Plan Requirements for Dental Facilities.

Dear Mr. DiGironimo,

The Ontario Dental Association is the voluntary professional organization which represents the dentists of Ontario, promotes the highest standards of dental care and advocates for accessible and sustainable optimal oral health for all Ontarians.

The ODA appreciates the continued dialogue it has had with Toronto Water's Environmental Monitoring and Protection Branch to ensure the proposed revisions to the *Toronto Municipal Code, Chapter 681, Sewers* meet the City's objectives and are feasible for dental offices to implement.

The ODA understands that if the proposed change to the Code is approved by Council, beginning January 1, 2016 all dental offices will need to submit a Pollution Prevention Plan (P2) only once using the new form (an updated form will be required when there is a change of ownership or size of the office) and will subsequently need to submit evidence of the amalgam separator maintenance *based on manufacturer requirements*. The timing for the submission would therefore vary for each office based on the volume of amalgam work, number of operatories and brand of amalgam separator.

The ODA supports the current proposal to submit evidence of machine maintenance based on manufacturer requirements rather than on a fixed annual basis. As each machine's maintenance schedule would vary based on the volume of use and the machine's configuration, the ODA believes this is a reasonable approach. Removing the need for dental offices to submit a completed P2 form every two years also reduces the administrative burden. However, what is unclear at this point is the timeframe allowed for submitting the maintenance record once there has been a service maintenance. We would be pleased to discuss with you what an appropriate period of time would be for dental offices.

The ODA understands that Toronto Water Environmental Monitoring and Protection Staff are also investigating the potential for an online portal to be developed which would allow dental offices to submit information directly with the possibility of adding attachments such as amalgam separator maintenance invoices. The ODA appreciates any move that will reduce the administrative burden for dental offices, however, it asks that the City consider providing dental offices with a choice, either web based or paper based, regarding how they wish to meet the proposed requirement.

Through the extensive consultation process, the ODA provided Toronto Water Environmental Monitoring and Protection Staff with a number of suggestions on amending the P2 form for Dental Facilities. City staff have communicated to the ODA that many of those suggestions were incorporated into the design of the proposed revised form. However, the ODA further suggests that the reference to the *Municipal Code Chapter 681* from which the P2 form originates should be added to the introduction of the form. The ODA trusts that with the implemented changes, the form will be clearer for dental practices to use and appreciates the opportunity to be involved in that process.

Finally, the ODA asks that the City directly communicate these changes to ensure that dental offices in the City of Toronto are aware of the new requirements, and provides sufficient time for the new P2 forms to be submitted, such as within a 6 month window from the approval date of the changes.

Once again, the ODA appreciates the opportunity to offer support and comments to the Public Works Committee in an effort to reach mutually agreeable outcomes on these matters. Any questions about these comments can be directed to Ms. Rose Abate, Corporate and Health Policy Research Manager.

Thank you for your consideration of these issues.

Sincerely,

A handwritten signature in cursive script that reads "Donald Young".

Dr. Don Young
Chair, Health Policy and Government Relations Advisory Committee

cc. Ms. Joanne Di Caro, Toronto Water, Manager of Environmental Monitoring & Protection