



October 29, 2025

Nancy Martins  
Toronto City Hall  
100 Queen Street West  
Toronto, ON M5H 2N2

To: Planning and Housing Committee, City of Toronto

Re. **PH25.8 - Property Standards By-law: Phase II Review and Other Property Items**

As a health advocacy organization focused on environmental harms, the Canadian Association of Physicians for the Environment (CAPE), Ontario chapter, has significant concerns about the recommendation in the Report from the Interim Executive Director, Municipal Licensing and Standards pertaining to lead service lines.

The report's recommendation that no provisions regarding lead pipe identification and mitigation be added to Chapter 629 of the Toronto Municipal Code threatens to leave Toronto residents exposed to lead contamination.

The primary source of lead in residential drinking water is from the lead service lines which connect buildings to municipal water mains. As noted in the report from the Canadian Environmental Law Association (CELA)<sup>[1]</sup>, research shows that partial lead service line replacements, such as would continue to be permitted under existing by-laws, are not effective at keeping lead levels below the 10bbp over time. Sporadic increases in lead levels have been observed in tap water after such replacements, likely because of either disruption during construction or as a result of galvanic corrosion at the connection point between new and older pipelines.

Lead exposure is a serious public health concern. Exposure to lead, even at low levels, and especially in children, can have life-long impacts. Lead exposure affects children's brains and nervous systems and can result in learning disabilities, behavioral problems, lower IQ, and developmental delays.

The only way to prevent such exposures is to pass a by-law mandating complete replacement and remove remaining partially-replaced lead service lines. We are particularly concerned that

such a by-law be passed before the watermain replacement scheduled to be undertaken in Kensington Market in 2027. Without such a requirement, the residents of Kensington Market, which includes children from equity-owned communities, will be exposed to lead for decades to come.

Accordingly, CAPE, alongside CELA, calls on the committee to pass a by-law that prohibits partial LSL replacements and institutes an equity-informed financial support structure for the costs associated with replacement.

Sincerely,



Dr. Samantha Green

Family Physician in Toronto

Incoming President, Canadian Association of Physicians for the Environment



Dr. Sehjal Bhargava,

Co-chair, Canadian Association of Physicians for the Environment, Ontario

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[1] Julie Mutis, *End of the Line: A better way for municipalities to get the lead out of our drinking water:*

*Recommendations for how Ontario municipalities can achieve a lead-free future.* Canadian Environmental Law Association, CELA publication #1649, 2025, ISBN # 978-1-77842-031-3