



**KENSINGTON MARKET  
COMMUNITY LAND TRUST**

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October 30, 2025

To: Planning and Housing Committee

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

With the assistance of the Canadian Environmental Law Association, we have done a preliminary review of the staff feasibility report for PH25.8 and are disappointed that it recommends against taking action to protect tenants and the broader public from lead exposure.

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. Research shows that partial lead service line replacements, such as what is 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 report fails to address the issue of partial lead service line replacement. Leaving these lead pipes on the private property side will increase the amount of lead in the water for months or years to come and means renters in their homes will still be exposed to lead until the private piping is replaced.

Many other cities have passed bylaws prohibiting this, but for some reason Toronto has not. Without change this will lead to people in Kensington Market being needlessly exposed to lead for decades to come. For a neighbourhood where 64.4% of all residents are renters, this lack of action will have a significant impact in our community.

As the City plans to do a major watermain replacement in 2027, we are calling upon the City of Toronto to include an action to have these private lead piping replaced at the same time. By removing only half of the portion of potential-lead pipes, the City is only



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doing half of the work needed to protect our neighbours. The city's staff report notes that private lines will be replaced when property owners apply for building permits, but this will take decades to achieve and not all property owners will complete this level of work.

We are therefore calling on the City of Toronto to take the responsibility to remove lead today and to ensure our neighbours have clean drinking water going forward.

Sincerely,

Zack Bradley & Dominique Russell

Co-Directors

**Kensington Market Community Land Trust**

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