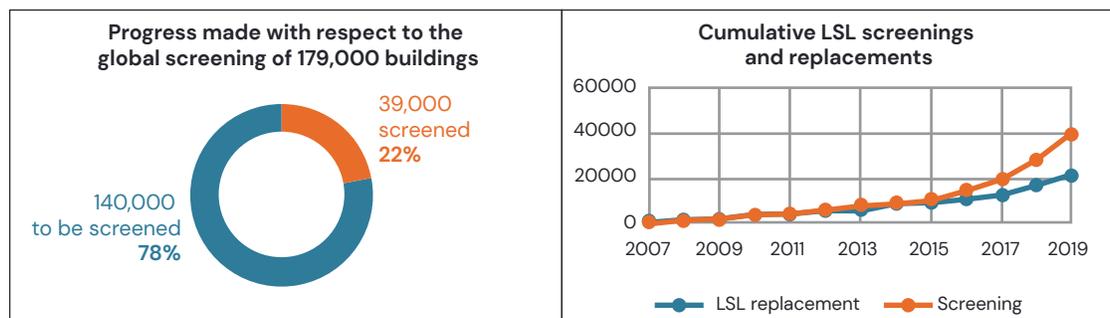


Management of Lead Service Line Replacements

Background

In 2007, in order to meet the government’s drinking water quality and public health requirements regarding lead in drinking water, the Ville de Montréal (the City) filed a plan to replace all lead service lines (LSLs), which called for the elimination of all LSLs (estimated in number at 69,000) by 2026. In 2019, in response to Health Canada’s change in the standard for the allowable concentration of lead in drinking water, and at the request of the Québec government, the City tabled a revised Action Plan (AP) to eliminate all LSLs by 2030. This revised plan provides for new actions, including accelerated screening. Lead is a metal known to have harmful effects on human health.

It is estimated that, as of December 31, 2019, approximately 21,000 of the 69,000 LSLs had been replaced. Between 2007 and January 2020, close to 39,000 buildings were tested. The 2019 AP calls for the screening of another 100,000 buildings. However, this number has increased considerably since the revised AP was approved, to reach somewhere around 140,000 buildings. In addition, there are approximately 21,000 buildings for which the public section of the LSL has been replaced and that need to undergo an analysis to determine whether there are any LSLs in the private section.



Purpose of the Audit

The purpose of our audit was to ensure that the implementation of the lead service line replacement (LSLR) activities is progressing in accordance with the 2007 AP that was revised in 2019 and that the municipal by laws regarding replacement work are being enforced as intended.

Results

While the initial AP was approved in 2007 by the Québec government, we note that the information available on the progress of the elimination of LSLs does not provide us with an overall picture of the situation that could be used to make informed decisions and to properly inform the public. Thus, we note that the replacement of LSLs has not progressed as planned in the AP. In addition, we did not find evidence that the regulations respecting the elimination of LSLs were systematically applied as required. In order to fully implement the AP, considerable work remains to be done and, as a result, the City must review existing management practices to accelerate the pace of LSL screening and replacement activities.

Main Findings

Roles and Responsibilities

- The roles and responsibilities of the various stakeholders involved in LSL screening and replacement operations have not all been clearly defined, communicated and implemented.

Implementation of the Action Plan

- The 2019 revised AP has not been updated to incorporate all relevant sectors of activity and new data to ensure that all LSLs are eliminated and that the health risks to the population exposed to LSLs are controlled.
- Not all of the activities provided for in the AP were accompanied by more specific timelines, targets and indicators, and not all of them were subject to periodic performance evaluations as part of the implementation of the AP, in order to make the required adjustments, if necessary.

Follow-up of the Implementation

- The monitoring mechanisms in place are not sufficient, causing problems in the collection, compilation and validation of data, particularly concerning LSLR operations. This poses a risk regarding the reliability and exhaustiveness of the data.

Monitoring of the Application of the Regulations

- The monitoring mechanisms in place do not provide the assurance that the adopted regulations and guidelines have been applied.

Means Used to Communicate with Citizens

- The interactive map and website do not provide information to citizens about the replacement of LSLs or about the progress of AP activities overall.

Accountability

- There is no reporting system to periodically and formally inform the elected officials and the managers concerned about progress with respect to the implementation of the AP.

In addition to these results, we have made various recommendations to the business units, which are presented in the following pages. These business units were given the opportunity to agree to the recommendations.