

# ONTARIO SALT POLLUTION COALITION

<https://saltpollution.ca>

21 March, 2024

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Honourable Minister Andrea Khanjin  
Ministry of the Environment, Conservation and Parks  
College Park  
777 Bay Street, 5th Floor  
Toronto, ON  
M7A 2J3

Dear Minister Khanjin:

## **Provincial Action on Road Salt Pollution of Aquatic Bodies**

**We are writing to request your Ministry undertake urgent action to create ecologically protective water quality standards, regulation, and enforcement for chloride pollution in Ontario water bodies under its obligations through the Canada-Ontario Great Lakes Agreement.**

Road salts represent the largest source of chloride inputs into Ontario waters. Ontario makes up less than 11% of Canada's landmass, but it is the biggest user of road salts in the nation. Your Ministry's scientific data shows conclusively that salt has been and continues to be a threat to aquatic ecosystems which is increasing in magnitude over time.

The scientific data is conclusive of this growing threat. For example, data from the open-source Ontario Data Catalogue, as summarized by your Ministry representative at the Landscape Ontario Salt Forum in October 2023 showed:

- Chloride levels in rivers and streams in urban areas often exceeds Canadian Water Quality Guideline (CWQG) of 120 mg/l, (chronic) and are increasing
- Chloride levels in remote lakes that have adjacent maintained roads are increasing
- Drinking water intakes, even in large lakes like Lake Ontario, have reached 30 mg/l chloride and are increasing

Additionally, independent sampling of some streams such as the Holland River or Black Creek have shown chloride spikes of 1000 mg/l or more, well above CWQG acute guidelines. The Environmental Commissioner of Ontario (ECO) report of 2018 cited average chloride levels in the Grand River of 560 mg/l, almost 5 times the national guideline. These issues are not

isolated incidents. The 2018 ECO report made many excellent recommendations, including research on alternatives, adopting salt management plans, contractor certification, and contractor liability protection. Your Ministry response to these recommendations was a commitment to “consider,” but we are calling for more than the Ministry’s consideration on this issue of rising salt pollution. We are asking for your commitment to protect water by taking action on salt pollution.

We therefore make this request in the context of Ontario’s obligations to act on road salts and chloride under the Canada-Ontario Great Lakes Agreement of 2021. The Agreement states Ontario will:

- Build on existing drinking water source protection activities to ensure that environmental impacts to the Great Lakes ecosystem from road salt use are minimized;
- Work with municipalities, conservation authorities, private sector and other partners to promote salt application best management practices, certification and alternatives for both public and private salt applicators, including on private roads, sidewalks and parking lots;
- Assess pathways for road salt into groundwater, impacts of road salt use on groundwater, and groundwater as a source for salt contamination to surface water bodies and aquatic ecosystems; and
- Investigate technologies or processes for preventing chloride from road salt entering groundwater and surface water;
- Develop site-specific chloride guidelines for areas that are primary habitat for chloride-sensitive species.

This request for action on salt pollution is not made in isolation, but instead, as part of a legacy of long-term advocacy for provincial action on chlorides in Ontario waters dating back to the 1970s. This request builds on other requests made to the Ministry, including the recent [2018 submission by the Canadian Environmental Law Association, WWF Canada, and Environmental Defence Canada](#). Each of these requests included information characterizing the threat of road salts in Ontario and the rising chloride pollution levels in water, which has only worsened over time within Ontario watersheds.

We are also working in allyship with [Landscape Ontario which is seeking legislative change and the establishment of regulated technical standards for winter salt](#). Reforming the current liability system and creating a regulatory framework for salt application is a win-win-win for public safety, the economy, and the environment.

In March 2022, your Ministry held a workshop on road salt use and management in Ontario, including discussion of best management practices. We applaud this, however to our knowledge, there has been no follow up on salt management approaches since that time.

There are multiple pathways to engage this water quality issue from a policy & regulation perspective, including but not limited to establishing a provincial water quality standard for

chlorides, building on tools used for Source Water Protection under the Clean Water Act, implementing a bio-assays approach, and/or defining different chloride sensitivity-levels for zones / watersheds which can be connected to best management standards or codes. Whichever avenue emerges as the best pathway forward to address chloride, we strongly encourage the use of regulation as a key part of the policy approach to ensure outcomes that are ecologically protective of water and ultimately, enforceable. [The OSPC website contains a four-point action agenda](#) we hope you will pursue with immediacy.

We trust that our recommendation to undertake urgent action on an ecologically-protective approach to addressing salt pollution in Ontario water bodies will be duly considered and acted upon by the government of Ontario. We encourage you to establish a multi-stakeholder working group to inform this policy and would be happy to participate to ensure meaningful action for water.

Honourable Minister Khanjin, we respectfully ask for a written response to this submission and a meeting with you or your staff to further discuss pathways to protect water-based ecosystems from the ever-increasing threat of salt pollution.

Yours in water protection,

## **The Ontario Salt Pollution Coalition**

*c/o*

**Dani Lindamood**

Coordinator, OSPC

Programs Director, Water Watchers

**Claire Malcolmson**

OSPC Coalition Member

Executive Director, Rescue Lake Simcoe Coalition

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CC: Honourable Premier Doug Ford, Auditor General Shelley Spence, Honourable Doug Downey