

THE NORTH BATTLEFORD WATER INQUIRY

**HONOURABLE ROBERT D. LAING
COMMISSIONER**

WRITTEN SUBMISSION

**MADE ON BEHALF OF
THE CANADIAN UNION OF PUBLIC EMPLOYEES,
LOCAL 287**

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January 9, 2002

**CANADIAN UNION OF PUBLIC EMPLOYEES, LOCAL 287
SUBMISSION TO
THE NORTH BATTLEFORD WATER INQUIRY**

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I. INTRODUCTION

Communities that claim not to be able to afford proper filtration can expect to experience periodic episodes of parasitic infections, such as cryptosporidiosis.¹

In the spring of 2001 an outbreak of cryptosporidiosis in the City of North Battleford prompted the Government of the Province of Saskatchewan by Order-in-Council dated May 10, 2001 to order a Commission of Inquiry into matters relating to the safety of the public drinking water in that community.

Plant operators were the employees who were on the front line in the treatment of water and wastewater in the City of North Battleford. It therefore came as no surprise that some people in the community, and the Province at large, were inclined to blame the operators for contamination of the drinking water supply. The Commission of Inquiry was an opportunity for operators to clear their names and reputations in their home community and the community at large. For this reason they greatly appreciated the decision of the Commissioner to accord standing to their representative, the Canadian Union of Public Employees, Local 287.

¹ *The Canadian Encyclopedia, 2000 ed.*, James H. Marsh, editor-in-chief, McClelland & Stewart, Toronto, Ontario, p.2481.

The Terms of Reference established for the Commission do not contemplate that any finding of fault or blame shall be made. It is expected however, that the Commission will report on the events and facts surrounding the contamination, and these findings may well point to certain acts or omissions that may be viewed as contributing factors.

For the record, it should be stated that the operators accept that the outbreak of cryptosporidiosis in the City of North Battleford in the spring of 2001 was caused by the presence of cryptosporidium in the supply of water from the surface water treatment plant. They also accept that it was the malfunctioning of the solids contact unit that led to the cryptosporidium parasite passing through the plant and into the water distribution system. They do not however, accept any suggestion that they were in any way responsible for the contamination that occurred.

It is respectfully submitted that the evidence led during the Commission of Inquiry clearly established that plant operators performed their job duties in a manner that exhibited a very high level of excellence. It was also eminently clear that operators were often required to perform under extremely adverse circumstances. Finally, it is respectfully submitted that the operators who worked at the water and wastewater treatment plants did everything in their power to ensure a steady supply of safe drinking water was available to residents of North Battleford and to try and guard against any contamination.

Operators did not do anything in the spring of 2001 that had not routinely been done as part of their job duties in the past. Nor did they fail to perform any function or task that they had performed in the past. Annual cleaning and maintenance of the solids contact unit was routine. It should be noted that the solids contact unit was completely inoperative for six weeks or more in 1999 when the vari-drive was sent away for repair. That it was not functioning properly, or at all, was quite without consequence during that period of time.

In July of 2000 a crack was discovered in the floor of the solids contact unit. It was the view of the employer and the operators that this structural defect had to be examined before the busy spring and summer season produced its concomitant demand for increased water consumption. The solids contact unit had to be drained completely in order to properly inspect and photograph the crack in the cement floor. Who could foresee there would be difficulty in the formation of a slurry pool, or sludge blanket thereafter? Again operators did everything in their power to assist in the development of this flocculation device, including alerting management about the dilemma.

Evidence of the diligent efforts displayed by operators was documented as far back as five years ago when the Pommen and Associates Report² dated October, 1996 stated:

² Exhibit C-38, Tab 15, p.19.

The plants have not been upgraded in recent years. The technology in the plants is typically older technology. Technical evaluation of the sewage treatment plant by engineering consultants has identified improvements necessary to allow the plant to meet effluent discharge standards on a consistent basis. Ingenuity and skill of the plant staff are required to keep these three facilities functioning and compliant with provincial standards.

Another example of unsolicited commendation of plant operators is found in the Reid Crowther Report³ dated January 8, 1997 wherein the authors state:

Credit must be given to the operators for managing to operate such a difficult plant. They have made the treatment system work surprisingly well considering the outdated technology and the unconventional plant configuration.

In his evidence to the Commission of Inquiry, Mr. Ivan Katzell, the long-time foreman of the sewage and water plants, made the following statements about operators⁴:

When you -- when you -- I want to make -- make sure that you understand that we're talking -- I've heard a lot of people say technical training and so on, okay.

And what I found in my department was that, yes, you can have your technical training, but the people that actually work there had to understand how the place worked, why it worked the way it did, because in some instances it did not work or perform the way that the textbook would have taught you.

So consequently, some of the best operators were the senior -- were the senior fellows, and if I may use names, Lloyd Serool and Brian Wicks and -- and Pat, they were -- they didn't have the technical training, but these fellows were very good at their job, very good.

And these are the fellows, some of the fellows that I relied on because they knew what they were doing, they

³ Exhibit C-38, Tab 19, p.E-3.

⁴ Inquiry transcript dated November 5, 2001, pp.226-227.

understood the place very well.

That operators carried out the performance of their job duties in a manner that was diligent and competent was clear from their own evidence before the Commission. Mr. Pat Fluney, Mr. Frank Hollmann and Mr. Peter Allen all testified to care and precautionary measures taken in their work at the treatment of water and wastewater facilities. They also gave evidence with respect to the difficulties involved in carrying out their work responsibilities in light of insufficient resources, outdated equipment, an inadequate number of employees, and an absence of competent supervision.

The year 2001 was especially trying for the operators in light of the fact that they worked without any foreman or manager for the first seven and a half months of the year; the cryptosporidiosis outbreak occurred in March and April; three operators were ordered by their physicians to go off on stress leave during the summer months; and during this time operators were subjected to three, and in some cases four, separate interviews conducted by various agencies and individuals in connection with the investigation and preparation for the Inquiry hearings.

On that note, operators wish to express their sincere appreciation to Mr. Jim Russell, Counsel to the Commission, for the courtesy and respect shown to them in the interviews leading up to, and also during the course of the Inquiry hearings.

II. TRAINING AND DEVELOPMENT

Earth is a water planet. Water, in either liquid or solid ice form, covers about seventy per cent of the surface of the earth. According to the World Health Organization, most enteric diseases in the world are associated with contaminated drinking water. Today the agents of greatest concern are cryptosporidium parvum and enteric viruses.⁵

Water and wastewater treatment is a dynamic process. It becomes increasingly complex as our land and water become more polluted. Technology, equipment and methods of treatment are constantly changing. As new processes, equipment, and methodology are created and introduced into the workplace, personnel in charge of water and wastewater treatment are faced with a need to understand and adapt to rapidly changing conditions.

Eight water and wastewater treatment plant operators are employed by the City of North Battleford. Each one is required to have sufficient skills and abilities to operate not one, but three treatment plants, namely: the ground water plant, the surface water plant, and the sewage treatment plant. They also are responsible

⁵ *Canadian Encyclopedia, 2000 ed., supra*, p.2481.

for all of the maintenance and janitorial work associated with operating the plants. In addition, they are expected to tend to the underground reservoirs, booster stations, and sewage lift stations. Four of the operators are currently classed as Class 3; two are classed as Class 2; and two are classed as Assistant Plant Operators. The current Manager has a Class 3 in water treatment and a Class 2 in wastewater treatment. The Director of Public Works and Utilities has little or no understanding of water or wastewater treatment methodology, technology, or processes.

In the City of North Battleford, as in all Saskatchewan municipalities, the City owns the water and wastewater treatment facilities. It is responsible for ensuring that the staff who are employed in these facilities are properly trained. This means having a plan as to which employees require what type of training, and an investigation into where and how they may obtain it. It means allocation of an adequate training budget. It means having enough staff to ensure that the workload will be covered while one or more employees are attending training courses, conferences and seminars.

Ideally, it would mean a thorough introductory orientation, adequate initial training, and proper evaluation of each new employee who comes on staff. It would also include a future plan for each employee for additional training and development in order that each individual would become equipped to realize their full potential in the workplace.

In the past operators have not been encouraged to attend conferences or conventions of their peers, much less to attend training and development seminars. Indeed, virtually the only training that operators have been provided with has been in the area of occupational health and safety. While this is admittedly important, it is of little or no consequence in adding to one's knowledge or ability to operate a water or wastewater treatment facility. One of the operators was allowed to attend his first conference in twenty-five years during the time the hearings were being conducted.⁶

In the City of North Battleford, operators do not have access to on-line training, such as is available in other jurisdictions. Operators are the only civic employees without access to the Internet on a proper computer system. Indeed, they do not even have a computer system which functions properly. At a time when much information is available online with respect to new technology and innovative treatment methodologies, as well as water and wastewater treatment problems, it is ludicrous that operators do not have access to this information. Worse yet, operators employed by the City of North Battleford are not even allowed to make long-distance telephone calls to consult with colleagues in other water and wastewater treatment facilities.

⁶ Mr. Grant Hipkiss attended a Saskatchewan Water and Wastewater Association Conference in Saskatoon in November, 2001.

Knowledge is power, and in order to provide safe, efficient and effective treatment of drinking water and wastewater so as to ensure the health and safety of the public, plant operators must have easy access to information and ample opportunities for training. Knowledge must be shared in order for it to be effective. This has been recognized by other jurisdictions. In Ontario the provincial government has recently passed legislation to ensure that plant operators receive at least 40 hours of training each year. The annual number of hours devoted to training and development is to be increased to 76 hours for each individual plant operator by the end of this year.

In the United States the American Water Works Association maintains an online training institute.⁷ Their web site is described as a web resource for water professionals and it promotes online training as follows:

Why Online Training?

Employee populations are becoming more decentralized, government-mandated training is on the rise, and training budgets are tighter than ever. The time is right for Web-based training. Studies show that online training, when done right, can be as effective or even more effective than classroom or CD-ROM-based courses. Plus, online training can be more convenient, less expensive and easier to manage.

The site describes six additional advantages of online training, namely:

- no travel cost;
- quick and easy updating of course content;

⁷ <http://awwa.advanceonline.com/why_online_training.htm>.

- convenient anytime, anywhere training;
- interaction with a course expert and other students;
- simplify course administration and record management; and
- customized course content.

The Watershed Academy Web of the United States Environmental Protection Agency is another agency that invites all interest trainers to freely use Watershed Academy Web materials. Its website reads as follows:⁸

With few exceptions (e.g. copyrighted graphics we have reproduced only with permission), our modules are in the public domain and may be downloaded, reproduced and modified for your own use. This information is presented in a style that is not heavily academic, in order to reach the broadest audience possible. Nevertheless, these peer-reviewed lessons are based in sound watershed science and practice, and can be supplemented with more technical readings if a more academic treatment of the subject is desired.

In Canada, the provinces of Newfoundland, Prince Edward Island, Nova Scotia, New Brunswick, Quebec, Ontario, Manitoba, Saskatchewan, Alberta, British Columbia and the Northwest Territories, have either web sites, and/or contact persons listed with the American Water Works Association. Online access to both the sites and the individuals would be of great assistance to plant operators in obtaining information, training materials, and assistance or advice in the event they were to encounter unusual problems.

⁸ <<http://www.epa.gov/watertrain/message.html>>.

Online distance learning is bound to become an integral part of continued training and development in future and it is essential that employees who work in water and wastewater treatment facilities have access to these resources.

Some persons appear to hold the view that training is a benefit exclusively for employees. A municipal councillor has been quoted in the local newspaper as saying “[insert quote]”.⁹ It should be noted however, that in the case of operators, the employer also benefits from ongoing operator training as the owner of the facility. Public consumers of drinking water are also major beneficiaries of increased operator training and development. *A fortiori*, the cost of training and development ought properly to be born by taxpayers through the auspices of the local municipal government authority.

The pay scales for the operators are very relevant to the issue of training, for the obvious reason that there ought to be some financial incentives for operators to participate in the training and upgrading programs. They should have something to show for their efforts. Rick Hanson, the Water Treatment Manager of the City of Prince Albert, told the Commission that the rates for operators in Prince Albert was \$5.00 an hour above the wages earned by outside workers or employees working in the City yards.¹⁰ Plant operator positions in the City of Prince Albert are one of the preferred jobs.¹¹ In North Battleford, as the collective agreement

⁹ See comments made by Councillor Len Taylor in the _____ edition of The Battlefords News-Optimist.

¹⁰ Inquiry transcript for December 5, 2001, p.156.

¹¹ Ibid, p.150.

shows¹², the pay scales for operators are much lower. As a result, there is little incentive to participate in training or to strive for certification at a higher level.

III. STAFFING AND SUPERVISION

As was noted several times during the hearing, many persons expressed the view that staffing resources at the water and wastewater treatment plants in the City of North Battleford are inadequate. The two water treatment plants and one waste water treatment plant must be staffed 24 hours a day, seven days a week in the spring, summer and fall, with reduced working hours during the winter months at two of the three plants. There are simply not enough people to ensure proper staffing levels.

Staff shortages was often used by the employer as a reason for denying training opportunities for current operators. The explanation was that there were not enough people to cover the shift schedule, particularly from April to October, to allow anyone to be absent. Holiday schedules, sick time, and leaves of absence put an enormous strain on staff. Indeed the Commission heard evidence of operators working 24 to 36 hour shifts this past summer. This is simply unacceptable in modern day society.

¹² Exhibit C-80.

A further issue raised during this Inquiry was the lack of competent, or any, supervision for approximately eight months from mid-December, 2000 to mid-August, 2001. While there may have been some explanation for a portion of that time, the fact remains that there was no supervisor or manager in charge of water and wastewater operations throughout this extended period. The Director of Public Works and Utilities, the second highest management person in charge of the facilities after the City Commissioner, lacked any technical understanding or expertise of the processes involved. Clearly this administrative vacuum created by a lack of anyone with technical expertise occupying a position of authority was a significant factor in the cryptosporidium contamination of March-April, 2001. Operators consistently raised concerns about the water and wastewater treatment systems that were not addressed because the managing director who was ultimately responsible for the facilities did not understand the process. This interfered with operators' ability to properly perform their job duties and created an extremely stressful working environment.

The absence of competent supervision also created a crisis in public accountability. Residents of North Battleford need to be assured that when an operator raises concerns about a potential problem with the treatment facilities, the persons in positions of power are going to investigate immediately, and if need be, act upon those concerns.

IV. COMMUNICATION AND ACCOUNTABILITY

Another serious problem that became evident during the Commission of Inquiry hearings was the general lack of communication and sharing of information between the civic administration and the plant operators.

There is no formal process to keep operators informed of current periodicals, journals, or other sources of relevant information, including changing conditions of the surface water in the North Saskatchewan river, or activities of the group which is currently working on changes to the system.

There appears to be little or no understanding on the part of the administration of the duties and responsibilities of operators, nor is there any interest in gaining a general knowledge of what they do or the problems they encounter. This lack of respect for their work efforts leads to a serious lack of job satisfaction on the part of employees of the water and wastewater treatment facilities.

A further serious lack of communication on the part of the Saskatchewan Environment Resource Management Department (SERM) became clear

during the hearings. The testimony of Mark Getzlaf¹³ evidenced that many people in SERM knew of the likely presence of cryptosporidium in surface water in Saskatchewan. Mr. Getzlaf did not quarrel with the suggestion that between 30 and 50 SERM employees had knowledge of this potential hazard. No doubt people in the Department of Health had similar knowledge.

It seems remarkable that neither SERM nor Saskatchewan Health took any steps to warn those communities that rely on surface drinking water of the possible presence of cryptosporidium in their water supply. Nor did they advise on possible measures that might be taken to deal with the potential danger. This is especially significant given that 167, or 30%, of all communities in Saskatchewan rely on surface water as their drinking water source.¹⁴ Ample authority for undertaking such activity exists in ss.14(1), 14(2)(a) and 15(3) of *The Environmental Management and Protection Act*.

Further, it should also be noted that Mr. Getzlaf did not disagree with counsel's assertion that none of the current SERM publications even mentions the word "cryptosporidium". It is submitted that these omissions constitute a glaring oversight on the part of SERM and the Provincial Government.

¹³ Inquiry transcript dated November 13, 2001, pp.200-218.

¹⁴ Drinking Water Compliance Report, published by SERM, September, 2001.

The lack of communication on many fronts inevitably leads to a serious lack of accountability between the various provincial government departments and the municipality. There were several examples during the testimony given by various witnesses of instances where a certain standard was regulatory and other instances where it was merely a “guideline.” In other situations standards were mandatory, however there was no system of checks and balances to ensure such measures were being complied with. This points to a dire need for better accountability and clear lines of authority in order to ensure the public’s right to safe drinking water is protected.

There is a need to effectively monitor and enforce regulations related to water quality and the environment. The province must have clear regulatory requirements to ensure the public has access to safe drinking water and that the treatment of wastewater is safe and efficient. Adequate funding is required so as to enable hiring enough staff to ensure compliance with the regulations. The question of adequate funding and the impact of budgetary decisions will be addressed more fully in section six of this submission.

V. MANDATORY CERTIFICATION

A voluntary certification program for operators of water and wastewater treatment facilities has been in effect in Saskatchewan for the past quarter of a century. Approximately twenty per cent of the 1600 operators in the Province were certified under this regime.

In July, 2000, the Saskatchewan Government enacted *The Water Pollution Control and Waterworks Amendment Regulations* pursuant to s.38(1) of *The Environmental Management and Protection Act*. The *Regulations* called for, *inter alia*, mandatory certification of operators of water and wastewater treatment plants. The *Regulations* also provide for the creation of an Operator Certification Board consisting of not less than three, nor more than seven, members charged with the responsibility of administering the operator certification program. About 130 operators, or slightly over eight per cent, are currently certified under the mandatory program.

The Canadian Union of Public Employees supports the concept of mandatory certification of personnel who are employed in the area of water and/or wastewater treatment facilities. In the same way that continuous training and development are needed in order to keep abreast of new developments in the dynamic process of water and wastewater treatment, so too is it necessary to have a method of ensuring that a standard level of skill, training and ability is met in order to perform job duties with an adequate measure of care, responsibility and protection.

The difficulties with the current program of mandatory certification are two-fold:

- 1.) the program appears to be ill-conceived and uncoordinated; and
- 2.) the lack of any provision to recognize years of operational experience, together with the inflexible nature of the program, clearly discriminate against long-term employees who may lack formal training or education, but have many years of on-the-job training that renders them expert and able operators of water and wastewater facilities.

Evidence was given with respect to the recommendation of the Certification Advisory Committee that a grandfather provision be incorporated into the mandatory certification program, however no real explanation was provided for SERM's failure to do so.¹⁵

The mandatory certification process currently involves four separate agencies with differing and distinct responsibilities as follows:

- SERM requires mandatory certification;
- The municipal owner of the water and wastewater treatment facility is responsible for ensuring that each operator receives adequate training;
- The Saskatchewan Institute of Applied Science and Technology offers some training, but none is available at levels 3 or 4; and

¹⁵ Inquiry transcript dated December 4, 2001, pp.65-67.

- the Operator Certification Board determines whether or not an operator is entitled to become certified.

In the final analysis this means the individual operator is at the mercy of any one, or all of these agencies, with little or no power or control over his/her opportunity for training or certification.

It is submitted that this is a situation in which the Prior Learning Assessment and Recognition (PLAR) program offered by SIAST, or some modification thereof, would be entirely appropriate.¹⁶ Prior learning assessment is a proven method of evaluating skills and abilities that have been learned by some means other than formal education. In most cases this knowledge has been gained through on-the-job training and experience. PLAR provides an opportunity for candidates to have their skill levels examined by a qualified instructor in order to determine whether or not they constitute an accredited course equivalent. The PLAR process utilizes a variety of means to measure knowledge such as on-the-job training, work experience, other independent training or studies, volunteer and/or community activities. Although assessment methods may include standard testing, in most cases it is based on other means of evaluation such as demonstrations, simulations, interviews, oral exams, or performance testing.

¹⁶ <<http://www.siastr.sk.ca/siastr/admissions/plar.htm>>.

PLAR assists employers by becoming "... part of your training strategy. It can help your employees efficiently upskill, (sic) retrain and receive certification that is recognized and portable."¹⁷

Clearly this method of evaluation is worth considering in the case of long-time operators of water and wastewater treatment plants, particularly in cases where these employees have not had the benefit of on-going training and development over the years.

VI. THE IMPACT OF BUDGET DECISIONS

The 1990s saw significant attempts by governments at all levels to reduce or limit expenditures. Cut-backs became common in Canada affecting all levels of government. This reflected a decision by governments to try to live within their means and begin to retire outstanding public debt.

In Saskatchewan, SERM was seriously affected. Documents filed with the Commission show that funding for environmental protection dropped by 45.9% between 1990/91 and 2000/2001.¹⁸ This reduction was particularly dramatic in

¹⁷ *Supra*, p.3.

¹⁸ Exhibit C-110.

1997/98, when it dropped to about half the amount expended two years earlier.

One of the consequences was that SERM ceased doing inspections of the North Battleford water and wastewater systems.

During the same time period, the City of North Battleford came under increased fiscal pressure as a result of a dramatic decrease in provincial government funding to urban municipalities. The province decreased urban revenue sharing grants by about 60% between 1990/91 and 2000/01. In part as a result of this decrease, and partly because of its own approach to these matters, the City severely restricted its expenditures on water and wastewater facilities. This is obvious from the City's budget information, and in particular the postponement year after year of the \$65,000 for site selection for the new wastewater treatment plant.¹⁹

At the same time as governments at all levels are trying to balance their budgets, there are voices calling for tax cuts of all kinds, including income tax, sales tax, and municipal taxes and fees. Neither the Province of Saskatchewan nor the City of North Battleford is immune from these public pressures. In the tax changes announced for the year 2000, the Provincial Government reduced provincial taxes by a net amount of \$240 million.

¹⁹ This item initially appeared in the 1997 City budget and has appeared in each and every budget since that time.

Curtailing or reducing expenditures and cutting taxes have broad appeal for citizens everywhere, at least to the point where the services they enjoy are significantly affected.

But therein lies the problem. Government services are almost invariably affected where expenditures are cut or curtailed, and tax cuts obviously reduce the ability of any government to deliver services. In such an environment, service cuts will inevitably occur somewhere. It may be the quality or availability of health care. It may appear in the condition of roads. It may affect the quality of our schools and education. In North Battleford, it happened to show up in the drinking water.

Notwithstanding the fiscal pressures it faced with declining provincial revenue sharing and lobbying for lower taxes, it is difficult to fathom the priorities of the City. Safe drinking water is fundamental to the good health of human beings, and its delivery should be accorded a very high priority. Public health is surely more important than street paving, tree-lined avenue, or parks and recreation. It is only prudent that the provision of many other municipal public services must naturally take a back seat to the quality of our drinking water.

The point was made by plant operators and other witnesses that the monetary resources allocated to the operation and maintenance of the equipment and facilities has been grossly inadequate. The approach of the administration may be best described as "*Penny wise and pound foolish*". A bandaid approach to maintenance and repair seems to have been the order of the day. Failure to

devote sufficient resources to operations, maintenance, upgrading and replacement of buildings and equipment as required, clearly carries its own risks, as was demonstrated in this contamination.

The moral of this story is that as a society we may demand that governments spend less money, and we may demand lower taxes, but this will only come, as night follows day, at the cost of a lower level of public services. It cannot be otherwise.

VII. PRIVATIZATION

There is clear consensus that Canadian public water systems are seriously under funded.

Some municipalities in other jurisdictions have moved to a complete cost accounting and cost recovery program. This takes all costs of water and wastewater treatment and supply into account, including the capital required to maintain and replace existing infrastructure and facilities.

Public debate is currently emerging with respect to just how these systems ought to be properly financed. In particular the question arises: Should water and wastewater facilities be supported on a basis of a program of user-pay?

CUPE has been actively engaged in the public debates in various communities across Canada such as Halifax, Moncton, Hamilton, Kamloops and Vancouver where municipal authorities were contemplating involving private sector interests in the design, construction and operation of sewer and water treatment plants. These arrangements are commonly known as by the oxymoron of “public-private partnerships or P3’s.” They are being promoted as a way to deal with aging infrastructure and inadequate levels of federal and provincial funding for municipal infrastructure.

The CUPE submission to the Walkerton Inquiry and the Union’s position in many of its publications on public-private partnerships stress the following dangers of these types of arrangements:

- there is no evidence that private companies can provide a better or more efficient service than can a municipality;
- private companies are not as accountable to the public as are municipalities;
- profits leave the community;
- much of the experience elsewhere is that service declines;
- that same experience indicates that prices increase; and
- polls taken in Ontario and British Columbia consistently show that more than 70% of Canadians are opposed to privatization of water services.

Unless the provincial and municipal governments are involved in a coordinated strategy to improve water treatment facilities and ensure quality and safe drinking water for Saskatchewan residents, there is a danger that private sector companies may try to get control of our water treatment facilities at which point there would be even less accountability to the public for water quality.

It is recognized that the subject of future ownership and operation of the water and wastewater treatment plants was not the subject of any evidence or discussion during the hearings, and is likely beyond the Terms of Reference of the Commission of Inquiry.

It should be noted however, that in those centres where the Canadian Union of Public Employees was involved in the debate as to whether or not private sector interests ought to be involved, Epcor Water Services was involved in at least two situations in British Columbia. Although Epcor is a public utility owned by the City of Edmonton, it has become very aggressive in commercializing its services to other communities. Mindful of the role played in the Inquiry by Dr. Stanley and Dr. Belosovich, both of whom are associated with Epcor, CUPE is concerned that privatization of all or some of the aspects of these plants may be considered by the City of North Battleford at some time in the future. It is unnecessary and contrary to the public interest for any municipality to surrender its water and wastewater treatment facilities to the private sector. Experience in other

countries has empirically shown that costs go up and service goes down when water treatment facilities are turned over to private enterprise.²⁰

This submission proceeds no further with this point in light of the fact it was not the subject of evidence led before the Commission of Inquiry. However, in the event the Commission wishes to pursue this issue further, the Union will provide additional information in support of its position.

VIII. RECOMMENDATIONS

- 1. That the City of North Battleford develop long-term training and development plans for operators of water and wastewater treatment facilities which will provide not less than 40 hours of job-related training annually for each operator, which training shall be paid for by the City including time away from the place of employment and all reasonable expenses incurred by the operator.***

- 2. That the City of North Battleford increase staffing levels at the water treatment and wastewater treatment plants.***

²⁰ UK Water Privatisation – A Briefing. Emanuele Lobina and David Hall, Public Services International

- 3. That the City of North Battleford ensure that plant operators be supervised by a competent person who has technical expertise and experience in water and wastewater treatment processes.**

- 4. That the City of North Battleford implement measures to maximize the flow of information to, and from, plant operators, including paid memberships to the Saskatchewan Water and Wastewater Association (SWWA), attendance on a rotational basis at SWWA conventions and seminars, access to the Internet through new computers, more liberal long-distance telephone privileges, and improved internal communication systems to ensure that the views of operators will be heard.**

- 5. That the Government of the Province of Saskatchewan, through SERM, take steps to ensure that information about drinking water safety and treatment of water and wastewater be disseminated on a timely basis to municipal water treatment plants.**

- 6. That the Provincial Government implement a Safe Drinking Water Strategy that includes increased funding and staffing to SERM and Sask Water in order that those departments may increase their educational support services, monitoring and proper enforcement of regulations.**

- 7. That the City of North Battleford develop a process to ensure accountability for decisions regarding water and wastewater treatment facilities. This process should be developed in consultation with plant operators and must ensure their involvement in the discussions and decisions about water and wastewater treatment procedures and facilities.**

- 8. That the Provincial Government develop accountability procedures between the various departments that have responsibilities for the quality and safety of drinking water in Saskatchewan.**

- 9. That SERM continue with the mandatory certification program, but modify same to take into account the way in which the program will apply to older, experienced operators. Specifically, the program**

should be designed to recognize and credit the prior knowledge and experience of these operators on the basis of principles similar to the Prior Learning Assessment and Recognition program offered by SIAST.

10. That the training program required for the mandatory certification program be reviewed by SERM with a view to developing a core curriculum, and ensuring that training is readily available at a reasonable cost.

11. That municipal administrations be encouraged to adopt life-cycle infrastructure costing programs that take into consideration the long-term expenditures involved in the operation, maintenance, repair and replacement of water and wastewater treatment facilities.

12. That the Provincial Government increase its funding for municipal water infrastructure projects and that it lobby the Federal Government for financial assistance for such projects.

All of which is respectfully submitted.

Dated at the City of Saskatoon, in the Province of Saskatchewan, this 9th day
of January, 2002.

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