

August 22, 2024

The Honourable Sylvia Jones
Ontario Minister of Health
777 Bay St.
Toronto, ON, Canada

Re: Discontinuation of the Wastewater Surveillance program

Dear Minister Jones,

I am writing on behalf of Infection Prevention and Control Canada (IPAC Canada) to strongly caution against the cancellation of Ontario's wastewater surveillance program.

Infection Prevention and Control Canada (IPAC Canada) is a national organization representing 2100 professionals engaged in the prevention and control of infections (IPAC) throughout the healthcare continuum, with 8 chapters in Ontario. IPAC Canada's priorities include supporting the development of standardized, effective, and evidence-based IPAC practices and IPAC research in all healthcare settings and health-related activities.

The Ontario government's decision to eliminate wastewater surveillance for COVID-19 and other viral illnesses places our population's health at risk. As you know, this surveillance program was initiated during the COVID-19 pandemic. It is an invaluable tool in assisting healthcare workers, healthcare policymakers, and the public in predicting and understanding the spread of various COVID-19 variants and other viral illnesses, including mpox.

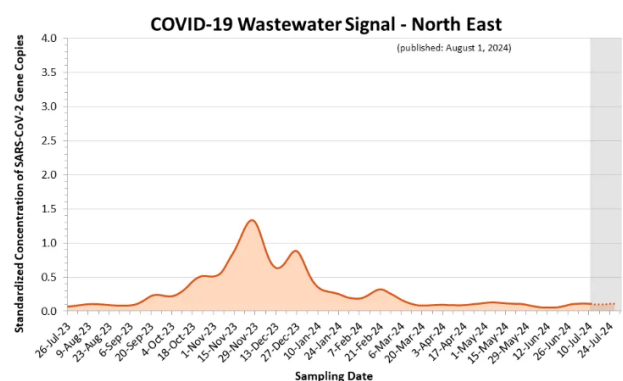
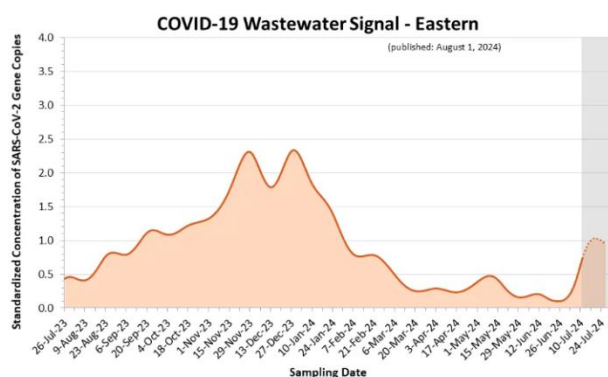
Wastewater surveillance is a unique, cost-effective tool¹ which allows us to monitor conditions of public health significance within communities, without the inherent bias of clinical specimens. Clinical specimens not only significantly underestimate the extent of a condition, but are a lagging indicator compared to wastewater surveillance, which time and again proved itself to be an invaluable early indicator of increased disease prevalence in the community. Wastewater surveillance was used not only for COVID-19, but for other significant respiratory viruses including respiratory syncytial virus (RSV) and Influenza, which can have devastating health outcomes among susceptible populations. Through wastewater surveillance, multiple surges and potential outbreaks were identified early, allowing the most appropriate decisions to be made about resource allocation within a defined jurisdiction. Eliminating wastewater surveillance significantly hinders these responses.

¹ [Archived - Wastewater monitoring | ontario.ca](#)

IPAC Canada is a tireless voice highlighting the need for our leaders to keep the lessons of COVID-19 at the forefront of planning and preparedness. The next pandemic is inevitable, but the timing is unpredictable. We had opportunities to learn from SARS in 2003, which devastated Ontario and demonstrated a critical lack of preparation to deal with an emerging and highly pathogenic organism. Unfortunately, it appears to experts that many lessons from previous crises were quickly forgotten. In early 2020 when it became clear that COVID-19 was a substantial threat, we simply weren't ready, neither provincially nor nationally. History is now repeating itself as we discard a useful predictive tool that has the potential to provide early warning of many emerging diseases.

While national data may be useful for the analysis of disease transmission on a national scale, local context is much more useful to direct on-the-ground action and solutions according to community needs. The latest report notes national reporting in only 4 wastewater monitoring sites in Ontario, all of which are in the GTA². Even with the planned expansion of the federal program, the scale of the surveillance will not hold a candle to the value previously created by Ontario's system. The data are not representative of the Ontario population and completely overlook rural, remote, and northern communities in which viral outbreaks can be devastating.

The most recently published data on the Ontario.ca website³ demonstrates the variability within the province in wastewater results for COVID-19. Using just two examples, pasted below, we can see the notable differences between the Eastern signal and the Northeastern signal. The differences nationally are even more profound and would fail to provide an accurate picture of what communities across the province are facing. To base local public health decisions on national data would be inaccurate and potentially wasteful.



IPAC Canada supports the development, evaluation, and incorporation of evidence-based decisions in health policy formulation. To achieve this goal, timely, accurate, and reliable data, such as those provided through wastewater analysis are necessary. We strongly encourage the Ministry of Health to re-evaluate its stance on wastewater surveillance, or at a minimum, work with PHAC to ensure the representativeness of

² [Respiratory viruses: Wastewater monitoring dashboard – Respiratory virus activity — Canada.ca](#)

³ [COVID-19 Wastewater Surveillance in Ontario | Public Health Ontario](#)

the entire province in the data collected and reported to ensure that the health of all Ontarians is being protected with the most effective and cost-efficient tools available.

To learn more about Infection Prevention and Control Canada, please visit <https://ipac-canada.org/> or contact us at info@ipac-canada.org

For your consideration.

Sincere regards,

A handwritten signature in black ink, appearing to read 'Colette Ouellet', with a horizontal line underneath.

Colette Ouellet RN BN MHA CRM CIC
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