

TO:	CHAIR AND MEMBERS CIVIC WORKS COMMITTEE MEETING OF FEBRUARY 20, 2019
FROM:	KELLY SCHERR, P.ENG., MBA, FEC MANAGING DIRECTOR, ENVIRONMENTAL & ENGINEERING SERVICES AND CITY ENGINEER
SUBJECT:	2018 EXTERNAL AUDIT OF LONDON'S DRINKING WATER QUALITY MANAGEMENT SYSTEM AND 2018 MANAGEMENT REVIEW

RECOMMENDATION

That, on the recommendation of the Managing Director, Environmental & Engineering Services and City Engineer, the following report on the 2018 external audit of London's Drinking Water Quality Management System, and the subsequent 2018 Management Review meeting, **BE RECEIVED** for information.

PREVIOUS REPORTS PERTINENT TO THIS MATTER
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[2016 External Audit of London's Drinking Water Quality Management System and 2016 Management Review, Civic Works Committee, November 1, 2016, Agenda Item #9](#)

[2017 External Audit of London's Drinking Water Quality Management System and 2016 Management Review, Civic Works Committee, December 4, 2017, Agenda Item #9](#)

2015 – 2019 STRATEGIC PLAN

The following report supports the 2015 – 2019 Strategic Plan through the strategic focus area of *Leading in Public Service*, through open, accountable, and responsive government, and providing excellent service delivery.

BACKGROUND

Purpose

Ontario's Safe Drinking Water Act, 2002, requires that operators of municipal drinking water systems conduct annual management reviews that evaluate the continuing suitability, adequacy, and effectiveness of their Quality Management System. The results of these reviews are required to be reported to the system owner.

This report satisfies that regulatory requirement and provides a summary of the June, 2018 external off-site surveillance audit completed on London's drinking water quality management system.

Context

Quality Management Systems (QMSs) can be defined as sets of interrelated elements (e.g. policies and procedures) that direct and control the way a facility operates with regard to quality. A QMS is a way of formally ensuring that an organization is consistently in control of the quality of the product or services that it supplies.

Following the Walkerton tragedy of May 2000, Justice Dennis O'Connor recommended that Ontario "*should initiate the development of a drinking water quality management standard for Ontario.*" A provincial Drinking Water Quality Management Standard (DWQMS) was therefore developed, which combined elements of existing ISO 9001 and HACCP standards. Through the Municipal Drinking Water Licensing Program, the Ontario government requires that municipal drinking water systems be operated by

“accredited Operating Authorities”. Accreditation is achieved by implementing Quality Management Systems that meet the requirements of the DWQMS.

The City of London’s Water Engineering and Water Operations Divisions form the accredited Operating Authority for London’s drinking-water system. Accreditation is maintained through successful external audits, which are performed annually by one of two auditing firms approved by the Province of Ontario. These external audits take the form of On-Site Verification Audits, which are performed every three years, and Off-Site Surveillance Audits which are performed in the intervening years. In June, 2018, an Off-Site Surveillance Audit was conducted on London’s Drinking Water Quality Management System by SAI Global Assurance Services.

Section 19 of the *Safe Drinking Water Act, 2012* imposes a statutory standard of care on the “owner of a municipal drinking water system, and every person who, on behalf of the municipality, oversees the accredited operating authority of the system or exercises decision-making authority over the system”. In recommending the Standard of Care provision, Justice O’Connor stated that “*the fact that a municipality has an accredited operating agency will do much to satisfy the standard of care.*”

DISCUSSION

Following the 2018 off-site surveillance audit, SAI Global reported that “*The overall effectiveness of The Corporation of the City of London’s Quality Management System is considered effective*” and recommended “*Maintenance of existing accreditation*”.

If the auditors find instances where the water system is not being operated according to the approved Operational Plan, then these are reported as either major or minor non-conformances. When non-conformances are identified in an audit report, the water system operators are required to submit Non-conformance Reports to the auditor, detailing the root cause of the non-conformance, the action taken to correct the incident and contain the problem, and the systemic (long term) corrective action(s) planned or taken to eliminate the root cause to prevent recurrence.

In addition to instances of non-conformance, auditors also draw upon their expertise and experience to report Opportunities for Improvement (OFIs), which are suggestions as to how the Operational Plan might be improved.

There were no non-conformances identified in the 2018 audit report. Three opportunities for improvement were identified as follows:

- There is an opportunity to:
 - i. clarify the Operating Authority of the Municipality of Middlesex Centre Distribution System; Middlesex Centre assumed operation 1-Nov-2016; and
 - ii. consider providing context within QMS-06 regarding the decommissioning of the Fanshawe and Hyde Park wells, as previous versions of QMS-06 identified their use in the event of long-term interruption of LHPWSS (i.e. why is this no longer a concern?).
- There is an opportunity to clarify the quarterly sampling locations within the City of London Water Supply Sampling Locations Map. Green icons (un-numbered / additional locations not identified in the legend or within the Quarterly tab of the Water Supply Sampling Schedule) are identified north of Baseline Rd (between Wharncliffe and Ridout) and on Richmond St (south of the Thames River).
- Ensure results of Management Review are communicated to the Owner in their entirety. A review of consumer feedback was completed 14-Dec-2017, after the initial Management Review results were communicated 12-Dec-2017.

On November 27, 2018, the Top Management team of the accredited Operating Authority for London’s water system (the Director - Water and Wastewater, and the Division Managers of Water Engineering and Water Operations) held the annual Management Review for London’s Drinking Water Quality Management System. The results of the Management Review are summarized in Appendix ‘A’.

CONCLUSIONS

In June, 2018, an off-site surveillance audit was completed for the quality management system of London’s drinking water system. The auditor reported that “*The overall effectiveness of the Corporation of the City of London’s Quality Management System is considered effective*” and recommended “*Maintenance of existing accreditation*”. There were no non-conformances identified by the auditor.

PREPARED BY:	REVIEWED & CONCURRED BY:
JOHN SIMON, P. ENG. DIVISION MANAGER WATER OPERATIONS	SCOTT MATHERS, P. ENG. MPA DIRECTOR, WATER AND WASTEWATER
RECOMMENDED BY:	
KELLY SCHERR, P.ENG., MBA, FEC MANAGING DIRECTOR ENVIRONMENTAL & ENGINEERING SERVICES AND CITY ENGINEER	

Attachment: Appendix ‘A’ – Report on QMS to Council

- CC: Martin Hayward – City Manager
 Aaron Rozentals – Division Manager, Water Engineering
 Dan Huggins – Water Quality Manager