



CUWA Policy Principles

Addressing Constituents of Emerging Concern to Ensure Safe Drinking Water

December 10, 2019

CUWA is committed to advancing reliable, high-quality water supplies for the state's current and future urban water needs in a cost-effective manner for communities, the environment, and the economy. The recent trend of “regulation through legislation” is a symptom of the lengthy procedural timeline for developing water quality standards according to the established protocols, which require assessments of health risks and technical/economic feasibility. Regulation through legislation also highlights the need for water utilities to respond to growing public concern and be proactive in addressing constituents of emerging concern (CECs). The following principles represent CUWA’s views on addressing CECs to ensure safe drinking water.

- 1. Water utilities play an important role in communicating with regulatory agencies and communities about safe drinking water.** The Flint water crisis and other recent events have created or further engrained a fear and distrust of tap water in many communities. Water agencies are best suited to understand what is needed to consistently treat and deliver high-quality water safe for human consumption. As stewards of public health, water agencies must champion these strategies and act to restore and maintain consumer confidence in our public water supplies.
- 2. CUWA recognizes the need to balance urgency and rigor in regulating CECs.** While the regulatory approach for developing new drinking water standards must be deliberate and data-driven, the current process can take multiple years. There is a need for a more accelerated yet rigorous and transparent process to better mitigate public concern while considering risk and the technical and economic feasibility of achieving new standards.
- 3. In developing new regulations, state leaders must consider holistically all the necessary investments to reliably deliver safe drinking water.** CECs are among many challenges facing water utilities today, including aging infrastructure, climate change, cyber threats, and more. Every dollar from customers’ water bills is invested back into the public water system to support day-to-day operations and maintenance, long-term improvements, and regulatory compliance. With limited resources to allocate, state and local agencies must evaluate all critical needs, counterbalance the costs with the relative risk of exposure through drinking water, and prioritize investments accordingly.
- 4. It is important for funding to have a nexus to the contaminant source, where possible.** Water utilities are often the last line of treatment for both regulated and unregulated contaminants and are typically unassociated with the contaminant source (e.g., certain consumer products and industries). Linking the funding responsibility to the sources of contaminants through the “polluter pays” principle can be done by encouraging responsible parties to reduce the presence of contaminants in water supplies, develop suitable techniques to detect these contaminants in the environment, and/or be involved in treatment costs. These options are viable ways to protect public health, restore consumer confidence in water supplies, and maintain water affordability. Reducing

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the presence of contaminants in the environment and exposure to the public can also be achieved by informing communities about the effect of consumer products on water quality.

5. **State leaders must jointly develop a unified voice to restore and maintain confidence in public water supplies.** CUWA agencies strive for transparency around CECs and stand ready to work collaboratively with state leaders. By jointly refining messaging, state and local agencies can better frame relative concerns about CECs, along with what is being done to protect water supplies in an accessible way that can mitigate public fears.
6. **All Californians deserve access to clean, safe water.** Small, disadvantaged communities are often most vulnerable to CECs. Nearly 1 million people in California receive unsafe drinking water from underperforming water systems. Building and maintaining consumer confidence in public water supplies requires restoring access to safe and reliable drinking water in all California communities. CUWA has been collaborating with the State Board and recently partnered with Water Research Foundation and Pacific Institute to develop a framework for sustainable public water systems that can be applied to create lasting change in California and across the country.
7. **Communication and collaboration with stakeholders are critical.** The public is more attentive to CECs than ever before, and it is important their voice is heard, acknowledged, and acted upon. Engaging state and local officials, research organizations, NGOs, private industries, and communities ensures that considerations such as occurrence, health effects, relative risk, analytical procedures, treatment technologies, resource impacts, and costs are understood and accounted for in the rulemaking process.