

The State Perspective:

Potential Role of HACCP and Water Safety Plans for Oversight of PWS or, Professionalism and Accountability in State Drinking Water Programs

*For: Risk Management Strategies for
Drinking Water Utilities
The Role of HACCP, Management
Systems and Water Safety Plans*

STATE OF CONNECTICUT
Department of Public Health

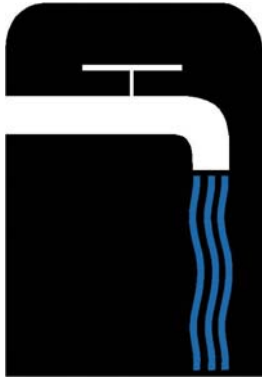


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ASDWA



Association of State Drinking Water Administrators

“TURNING VISION INTO REALITY”

- Since 1984 has addressed the need for state drinking water programs to have national representation.
- To protect public health through the assurance of high quality drinking water.
- 50 states, territories, D.C.
- Innovation

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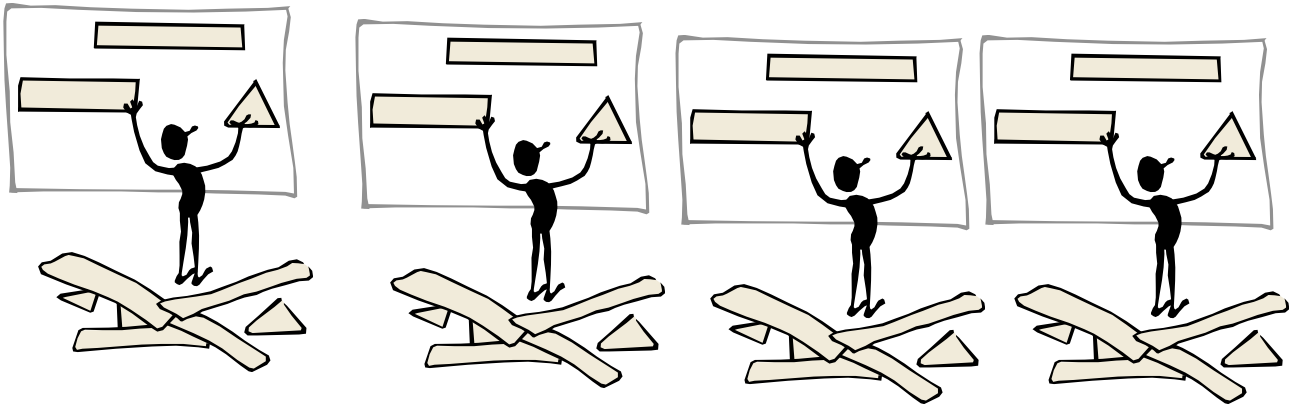


National Regulatory Challenges

- **Regulatory Perspective**: Primacy through US EPA and “stringency”
- **State Innovation**: Regulatory compliance in unique state situations
- **Comprehensive**: “Source to Tap”, includes source water assessments
- **Security Issues**: Security Issues: pre and post 9/11 – “New Business”
- **System Demographics**: 45,000 community and 200,000 non-community systems – predominantly small (<10,000=90%)
- **Regional Issues**:
 - *Radon-Arsenic-Uranium: Northeast and Southwest*
 - *Pollution: large urbanized surface waters*
 - *Agriculture: Midwest and California*
- **Rules**: Implementation of Existing Rules and prospect of more complex rules
- **Capacity**: Enabling Compliance?
- **Efficacy**: Resource constraints - \$370 million by 2006



What are the Alternatives to Regulatory Approach?



- **Super BAT:** Comprehensive technologies that address a variety of contaminants are desirable. Reliability, capacity, social acceptance are obstacles
- **Effective Drinking Water Quality Management Systems:** “Professional Accountability” examples in U.S. include Partnership for Safe Water, Accreditation Program, area-wide Optimization Programs
- **Innovative Risk-Based State Regulatory Programs:** Health based, functionally directed state regulatory programs can encourage system professionalism and accountability increasing acceptance of the concept of self-regulation



BONN CONFERENCES

EUREAU

IWA

AWWA United Kingdom

Scotland

USA

EPA

Ireland

Switzerland

ASDWA

Portugal

Canada

WSAA

WHO

Sweden

Australia

Holland

Greece

France

Denmark

Finland

Germany

Spain

Belgium

DVGW

BONN I – October 8-10, 2001

BONN II – February 9-11, 2004





BONN CONFERENCES

BONN I – “A Framework for Assuring the Quality of Drinking Water in the 21st Century”

- Input and Output Controls
- Catchment to TAP
- Institutional Arrangements
- HACCP-like (Australia)
- Flexible
- World Health Organization (WHO)

BONN II – “A Charter for the Effective Management of Drinking Water” – Review Framework

- Develop Charter of Effective Management of Drinking Water Quality

Overriding Issues:

EU – World Economy

WHO – World Health

Nationalism – World Politics

Cultural – Public Perception



BONN FRAMEWORK

Knowledge Sharing

Water resources & sources

Treatment

Distribution system

Consumer system

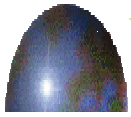


Drinking water quality management plan
Verification of drinking water quality

The goal:

Good Safe Drinking Water which has the *trust* of consumers

Roles and Responsibilities



THE GOAL

**Good safe drinking
water which has the
trust of consumers**

*After considerable discussion the Bonn 1 goal
seems the best compromise wording*



KEY CONCEPTS

FROM THE STATE REGULATORY PERSPECTIVES

The HACCP-like, management systems, water safety plans promote:



An overall approach to “drinking water quality management” - Professionalism



Allows regulator oversight within the confidence that management systems are in place. Permits states to prioritize limited regulatory resources - Responsibility



Adherence of an acceptable plan helps address safety, security, assessments and emergency response - Accountability



Regulator/systems management – Coordination in the integration of plan components promotes Cooperation and Communication between regulator and regulated.



Consideration of certified 3rd parties assists with state quality assurance burden



KEY CONCEPTS

FROM THE STATE REGULATORY PERSPECTIVES

The HACCP-like, management systems, water safety plans promote:



Cultural Acceptance of Professional Flexibility



Different Regulatory Structure from
Process vs. Product

It's just plain good
MANAGEMENT



Water Quality Safety Management HACCP-like Plans

HACCP (Australian)

1. Identifies Hazards ✓
2. Determines Critical Control Points ✓
3. Determines Performance Limits ✓
4. Establishes Monitoring ✓
5. Establishes Corrective Action ✓
6. Records Retention ✓
7. Process Control 3rd Party Verification ✓

Water Safety Plans (IWA)

1. Integrated Approach-Catchment to Consumer Source to Tap and Institutional arrangements ✓
2. Cooperation and Partnering ✓
3. Transparency of Procedures and Standards ✓
4. Science Based (Medical) ✓
5. Proactivity and Prevention (Public Health) ✓
6. Flexible to Accommodate Difference ✓



CONNECTICUT'S ATTEMPT AT ALTERNATIVE APPROACHES

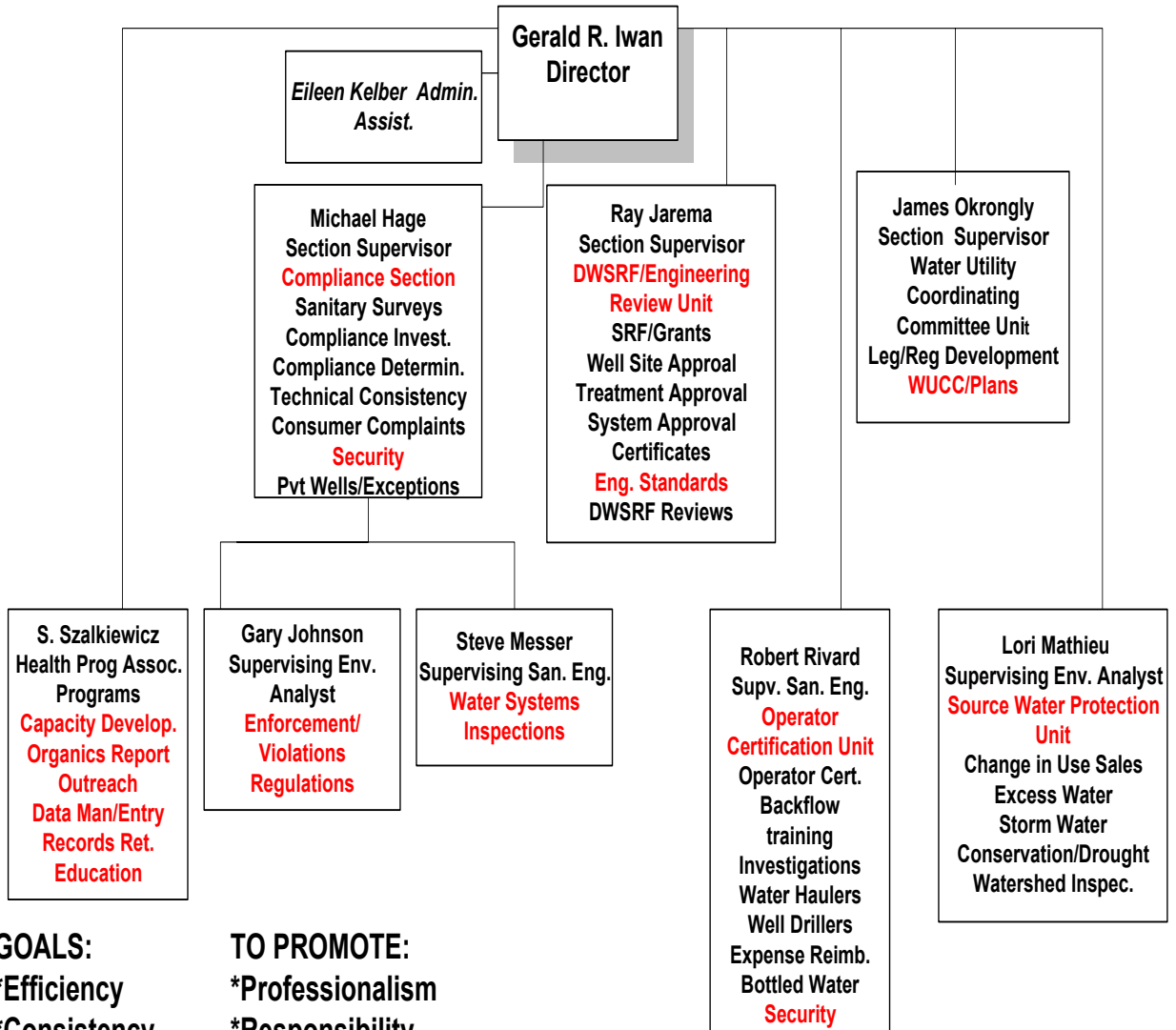
To accept the Management Plan Process, states need to be able to believe in and promote Professionalism, Responsibility and Accountability, within its water systems.

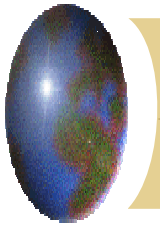
- This may require an Organization Change as well as personnel and environmental changes. (Change)
- This may require changing the “message” from one of acceptance to one of expectation. (Communicate Change)
- This may require inclusion of new groups or disciplines. (Active Listening)
- This may require increased education and communication skills. (Confidence Building)
- This will require new ways of doing business, more effectively and efficiently.



DRINKING WATER DIVISION

Functional Structure





**THERE IS NO
SUBSTITUTE FOR
PROFESSIONAL
ACCOUNTABILITY
IN**

***“PROVIDING GOOD
SAFE DRINKING
WATER THAT HAS
THE TRUST OF THE
CONSUMER”***