

Guidance for Preparing Drinking Water Advisory Notification Plans for Manitoba Water Suppliers

Purpose

This guideline has been established to provide drinking water suppliers throughout the Province of Manitoba with information on developing and maintaining Drinking Water Advisory Notification Plans.

The Drinking Water Safety Act states a boil water advisory may be issued by the Medical Officer of Health if drinking water is or may be unsafe. *The Drinking Water Safety Act* allows the Medical Officer of Health to direct the Water System Operator/Owner to provide specific instructions on water use, adequate notification of water users and direction on rescinding the advisory.

In addition, *The Public Health Act* states if a Medical Officer of Health reasonably believes that there is or might be a threat to public health in a health region, a public health advisory may be issued that describes the nature of the threat; describes any steps that persons should take to protect themselves; and includes any additional information that the medical officer considers necessary.

Appendix A outlines how notification should occur and the types of advisories.

Who needs to have an Advisory Notification Plan?

All water systems should have a plan to notify their water users of a potential health risk related to the water.

Public water suppliers servicing 1000 or more people are required to submit an Advisory Notification Plan to the regional Drinking Water Officer and to update and resubmit the plan every year by May 1 as a requirement of their operating license. The plan must include a detailed description of communication tools and methods to be used to notify the public of a drinking water advisory, considering key contacts, fan-outs, critical customers, susceptible or difficult-to-reach sub-groups, and template notices where applicable.

Small water systems should also develop an advisory notification plan and discuss the plan with their regional Drinking Water Officer.

What is an Advisory Notification Plan?

When a drinking water advisory is issued, the regional Medical Officer of Health or regional Drinking Water Officer will provide the water supplier with an advisory letter and a Public Notice. The timeliness of the required notification will be indicated in the advisory letter.

The water system will then activate their Advisory Notification Plan to ensure all water users are duly notified of the risk and the steps they can take to address the drinking water concerns.

Advisory Notification Plans address the question of how to distribute the Public Notice to water users in an appropriate way depending on the nature of the advisory. See Appendix A for types of advisories and information on adequate notification.

The plan should represent the complexity of the water system. Large water systems serving facilities such as hospitals, schools, personal care homes and daycares will have a more complex plan. The plan for smaller rural residential water suppliers may be relatively simple in comparison.

When developing the plan, the following items should be considered:

- identify key people within your organization (Incident Response Team) that would deal with media, provincial representatives, water users, etc. during an event
- identify the person(s) responsible for developing and maintaining the Advisory Notification Plan
- identify facilities such as hospitals, personal home cares, day cares, schools etc., that require immediate notification and the best ways of communicating with them.

Guidance for Preparing Drinking Water Advisory Notification Plans for Manitoba Water Suppliers

- identify susceptible subpopulations that might not receive or understand traditional emergency notifications including non-English speaking groups; individuals requiring assistance; homeless people, etc. and identify the best methods of communicating with these groups.
- identify subgroups that might need to take additional precautions (ex: health facility);
- identify groups such as school boards, regional health authorities, chamber of commerce etc., and identify a central point of contact within that group to fan out notification. See Appendix B for a guide on how to contact these organizations
- identify agencies such as local fire fighters, or other local groups that could deliver Notices or bring bottled water to the elderly or infirm
- determine the methods of communication such as media, phone calls, website social media, road signs, door to door etc., that would be the most effective means of adequately notifying all water users
- develop an annual procedure for verifying contact information, updating the plan and for systems greater than 1000 people, submitting the plan to the regional Drinking Water Officer by May 1 of each year
- develop a plan for debriefing after an advisory has been issued and update the plan accordingly
- develop a mechanism to evaluate the effectiveness of the notification

Special considerations:

- **Long-term Advisories:** for water systems under long term drinking water advisories, regular reminder notices are recommended, ex., enclose a copy of the Public Notice in the tax notice, e-mail, send a letter or call by phone. Regularly check to ensure Notices remain posted in public locations
- **Regional Systems:** water systems that supply multiple communities should work closely with each community to develop appropriate notification plans for each community. Communication plans involving water systems that serve communities across federal /provincial jurisdictions may have additional considerations.
- **Distribution System Zones:** Water systems that supply only part of a community or who have the ability to isolate contaminated areas within their system should be able to clearly communicate the areas at risk to the water users in the affected area and to those not affected.
- **Systems that supply water to cisterns or other water users not directly connected to the water system:** The advisory notification plan should include a plan to notify

cistern users or other water users of the health risks and necessary actions related to the water.

- **Complex Water Systems:** For water systems with complex distribution systems or servicing multiple communities, who may be able to isolate areas of the distribution system, a discussion must occur in advance of a drinking water advisory with the Drinking Water Officer and Medical Officer of Health to determine when a localized drinking water advisory may be applicable and to outline the notification plan for a localized advisory. Criteria for issuing limited advisories should be reviewed by the regional Drinking Water Officer and the regional Medical Officer of Health. The procedures for a limited advisory should be included in the drinking water emergency response plan. Current maps of the distribution system with identified sampling locations should be readily available to assist decision makers in the event an advisory is contemplated.

Rescinding an Advisory

- A drinking water advisory can only be rescinded by a Medical Officer of Health. Water users should be adequately notified of the rescinding of the advisory. See Appendix A.

Emergency Response Plans

The Water and Wastewater Facility Operators Regulation under *The Environment Act* requires all public water suppliers to have an emergency response plan.

The Advisory Notification Plan would be considered a communication subset to existing emergency response plans.

All public water suppliers are encouraged to review their emergency response plans to ensure it contains a procedure for immediately notifying all water users in the event an urgent drinking water advisory is issued.

For more information:

Office of Drinking Water Operational Guideline

https://www.gov.mb.ca/sd/pubs/water/drinking_water/odw_og_06.pdf

Health Canada's Guidance for Issuing and Rescinding Boil Water Advisories in Canadian Drinking Water Suppliers:

<http://www.healthycanadians.gc.ca/publications/healthy-living-vie-saine/water-advisories-avis-eau/index-eng.php>

The Drinking Water Advisory Communication Toolbox

developed in collaboration between the U.S. Centers for Disease Control and Prevention, Environmental Protection Agency, American Water Works Association, Association of State and Territorial Health Officials, Association of State Drinking Water Administrators and National Environmental

Health Association. This document is an excellent resource for developing an Advisory Notification Plan:

<http://www.cdc.gov/healthywater/emergency/pdf/dwact-2016.pdf>

Office of Drinking Water

Regional Drinking Water Officers are available for operational and monitoring advice and to provide technical assistance.

For more information related to Manitoba's drinking water and how it is regulated visit: <https://www.gov.mb.ca/sd/water/drinking-water/index.html>

For Manitoba Boil Water Advisory Fact Sheets:

<https://www.gov.mb.ca/sd/about/articles-and-publications/index.html?wg=odw&term=factsheetboil>

For Manitoba Water Quality Information:

Link to Manitoba Water Quality Advisory Fact Sheets and Public Water System Data:

<https://www.gov.mb.ca/sd/about/articles-and-publications/index.html?wg=odw&term=factsheet>

Appendix A

Types of Advisories and Guidance on Notification

Timeliness of public notification

- **Urgent:** advisories that require immediate action to prevent an increased risk to health. Urgent advisories include all boil water advisories and most drinking water avoidance advisories.
- **Moderate Urgency:** Advisories that require timely action for certain risk groups within a population: most water quality advisories.
- **Less immediate:** notifications that require action to prevent a low risk to health: most notification letters.
- **Reminder:** Reminder notifications for advisories that are already in place should occur at least once a year.

Types of Notification: (See Appendix B)

Primary Notification – is the notification of all affected water users in a reasonable and timely manner as outlined above. Water System Owners are responsible for primary notification.

Secondary Notification – is the follow up with important risk groups by key organizations to provide support and facilitate notification where possible.

Principles of adequate notification:

- Urgent notifications should occur in the fastest way that is reasonable to notify all individuals at risk
- Reasonable notification mechanisms may include:
 - delivering a copy of the Public Notice by hand and/or posting it on people's front door;
 - broadcasting the issuance of the advisory, recommended water use instructions and where water users can get additional information on water use on a radio or television station(s) received in the user area;
 - posting copies of the Public Notice in publicly accessible locations in the user area;
 - posting a copy of the Public Notice on social media pages, internet websites etc.(this should not be the only means of notification – it should be in conjunction with other appropriate means)
 - telephone fan out system or other notification systems
 - other appropriate means of communication
- A responsible party should be identified for primary notification, which is the notification of all affected water users in a reasonable manner.
- Notification should be in a format that the individual is likely to receive and understand.
- The more local and specific the message, the better.
- Special risk groups in a water system should be identified for enhanced communication
- Success of notifications should be evaluated
- Emerging or unusual risks should be monitored and communicated to water users
- Notification should occur regularly if the risk is ongoing

Types of Advisories^[1]:

Boil Water Advisories (BWAs) are announcements advising the public that they should boil their drinking water prior to consumption in order to eliminate any disease causing microorganisms that may be present in the water. With heavy bacterial contamination, a BWA for all domestic uses may be issued. BWAs are issued as a precaution against or in response to a waterborne disease outbreak. Urgent Notification is needed.

Drinking Water Avoidance Advisories (DWAAs) are rare announcements advising the public that they should avoid using their tap water, either completely or for specific uses, such as consumption. DWAAs can be issued when there is the potential for significant microbial contamination or the presence of substances that make the water unsafe to use.

Urgent Notification is needed. The two most common types of DWAAs include:

- A “**do not consume**” advisory would be issued if the health risk is only related to ingestion. The advisory would notify the public to avoid using the water for drinking; preparing food, beverages, or ice cubes; washing fruits and vegetables; dishwashing; and personal hygiene, such as brushing teeth.
- A “**do not use**” advisory would be issued in cases where dermal or inhalation exposure to the contaminant of concern in drinking water could affect the skin, eyes, and/or nose, to advise the public to avoid the water for all domestic purposes, including all uses identified for a “do not consume” advisory, as well as activities such as showering and bathing.

<https://www.canada.ca/en/health-canada/services/publications/healthy-living/guidance-issuing-rescinding-drinking-water-avoidance-advisories-emergency-situations.html>

Water Quality Advisories (WQAs) are announcements advising the public that a substance in the water exceeds the Manitoba drinking water standards or the Canadian Drinking Water guidelines and may cause a health concern for certain risk groups. WQAs are issued for higher standard /guideline exceedances or when more timely action is needed to protect health. The WQA advises the public of the actions they can take to reduce their risk. **Most Water Quality Advisories are of moderate urgency.**

Water Quality Notification Letters are a low level advisories from the Medical Officer of Health notifying water system users of a substance that is or may be present in the drinking water and poses a low risk to health. The letter provides information on the actions that water users can take to reduce / prevent exposure to the substance of concern. Discussions with Public Health on the strategy for notification may be required. The usual time frames for notification would be within three months of receiving the letter and then annually until the increased risk is resolved.

[1] *The Public Health Act (Section 22)* provides the authority for a medical officer of health to issue a public health advisory. In order to increase clarity for the public and water system owners, different types of public health advisories have been defined in this document to help people immediately understand the type of risk and the urgency of action required

Appendix B

Contacts to support the development of a Drinking Water Advisory Notification Plan

Primary Notification:

- Questions about the requirements of the notification: e.g. timeliness, boundaries, etc. – contact the Drinking Water Officer and the Medical Officer of Health (MOH). – contact information should be in the plan
- Media spokesperson – clarify with the regional MOH – a media communication plan should be included in the advisory notification plan.
- If you supply water to multiple communities, identify key contacts in communities and provide details of the notification plan for each community in the plan. For water systems serving federal jurisdictions, contact with the Environmental Health Protection Officer may also be necessary.
- Outline responsibilities and contact information for all staff assisting with primary notification.
- Other key contacts for primary notification

Secondary Notification: The advisory issued by the Medical Officer of Health will contain links to facts sheets that can provide support to more complex water users. In addition, some water users serve vulnerable populations or have complex operations and more effort may be required to assure that they are notified or more support may be needed to assist them in managing their operations during the advisory. Below are organizations that may be able to provide support in notifying people or managing operations during an advisory. It is recommended that you contact organizations who can assist you in advance and include their roles in the notification plan.

Schools and Educational Institutions within your water system

Contact the Superintendent of the School Division affected to obtain appropriate contact information.

Regional Health Authority (RHA) Buildings

Contact the RHA main office to connect with the key emergency response person in the RHA. Include this emergency contact in your plan.

Restaurants and Day Cares

In larger communities, a public health inspector may be able to follow up with day cares and restaurants. The public health inspector is notified by the MOH when a BWA is issued.

Food and Water Processing Plants

Manitoba Agriculture may follow up with food and water processing plants. Manitoba Agriculture is electronically notified of a BWA.

Community Inventory

Identify other groups who may require enhanced notification and determine contacts in advance, e.g. jails, universities, homeless shelters, groups who can communicate with people who may not have English as a first language, etc.

The U. S. Center for Disease Control Drinking Water Advisory Communication Toolbox may be helpful in identifying groups requiring enhanced notification.

<https://www.cdc.gov/healthywater/emergency/pdf/dwact-2016.pdf>