

Water Quality Laws and Waterborne Diseases: *Cryptosporidium* and Other Emerging Pathogens

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ABSTRACT

Waterborne diseases, such as cryptosporidiosis, cause many cases of serious illness in the United States annually. Water quality is regulated by a complex system of federal and state legal provisions and agencies, which has been poorly studied.

The authors surveyed state and territorial agencies responsible for water quality about their laws, regulations, policies, and practices related to water quality and surveillance of cryptosporidiosis related to drinking water. In this commentary they review the development and current status of federal drinking water regulations, identify conflicts or gaps in legal authority between federal agencies and state and territorial agencies, and describe court-imposed limitations on federal authority with regard to regulation of water quality.

Recommendations are made for government actions that would increase the efficiency of efforts to ensure water quality; protect watersheds; strengthen waterborne disease surveillance; and protect the health of vulnerable populations. (*Am J Public Health*. 2000;90:847-853.)

In 1993, national attention focused on the waterborne risks of *Cryptosporidium parvum*,¹ a relatively new human pathogen that is capable of causing life-threatening illness in persons with HIV/AIDS.^{2,3} Major outbreaks of cryptosporidiosis associated with drinking water in that year sickened more than 400,000 persons in Milwaukee, Wis., and thousands more in Las Vegas, Nev.^{4,5} In 1993 and 1994 the Centers for Disease Control and Prevention (CDC) linked 71% of waterborne disease outbreaks in those years to 2 pathogens, *Giardia lamblia* and *Cryptosporidium*.⁶

As an emerging pathogen,⁷ *Cryptosporidium* posed significant challenges to public health and water authorities. *Cryptosporidium* was highly prevalent in untreated source water,⁸ it caused substantial outbreaks of serious illness,⁹ and existing water testing and treatment methods failed to reliably detect⁸ or remove it.⁹ Additionally, responding to cryptosporidiosis outbreaks strained the existing public health infrastructure, requiring both effective surveillance and case investigations, since cryptosporidiosis had been linked to drinking water,⁸ recreational water,¹⁰⁻¹² food,¹³⁻¹⁵ person-to-person contact,¹⁶ and contact with farm animals.^{17,18} Researchers now know much more about *Cryptosporidium* than they did in 1993 and 1994. At that time, little consensus existed on the magnitude of risk posed by very low concentrations.¹⁹ More recent data, however, suggest that even low doses can lead to infection and illness in healthy volunteers.^{19,20}

Although *Cryptosporidium* is only one among many pathogens annually causing outbreaks of drinking water-associated disease and serious illness, its emergence has influenced federal and state policy-making since the mid-1990s. Public anxiety over *Cryptosporidium* motivated significant federal and state activity to learn more about the

pathogen and examine the adequacy of current water quality regulations, even as the number of drinking water-associated outbreaks attributable to *Cryptosporidium* decreased in 1995 and 1996,²¹ the most recent years for which complete data are available, and the risk to persons with HIV/AIDS declined with the increased use of highly active antiretroviral therapy.^{22,23}

Although major outbreaks of illness, such as occurred in Milwaukee, draw significant public and scientific attention to the problem of waterborne disease, traditional disease reporting greatly underestimates the burden of epidemic and endemic diarrheal disease caused by food,²⁴ drinking water, and recreational water.²⁵ Cases of gastrointestinal illnesses, from mild to severe, may number

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This commentary was accepted January 13, 2000.

Note. The project on which this commentary is based was undertaken in collaboration with the Centers for Disease Control and Prevention, the Environmental Protection Agency, the Council of State and Territorial Epidemiologists, and the Office of the General Counsel of Health and Human Services. The views expressed herein are those of the authors and do not necessarily reflect the official policy of the US Department of Health and Human Services, the Office of the General Counsel, or the Council of State and Territorial Epidemiologists.

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