



A Comprehensive Response to the Consumer Reports Article on PFAS in Drinking Water

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Earlier this year, I had the pleasure of speaking before AWWA's Utility Management Conference about "Communicating PFAS to the Press and the Public." (Feel free to contact us for a copy.)

During that talk, I specifically mentioned how news will continue to come out about PFAS, sometimes out of the blue, that will put utilities across the country on the defensive, especially if we avoid the issue.

Well, I was on a working vacation in the North Carolina mountains when I came home to find my monthly issue of Consumer Reports in my mailbox. Vacation over.

Over the last three years, my firm has been in the middle of PFAS-related controversies in several states, including the GenX discovery in North Carolina and the shutdown of a city's water supply in Georgia.

I've had to stand in front of banks of TV cameras and packed city and county council chambers talking about PFAS on behalf of our clients, answering questions for hours on end.

Because of this work, I've been asked for my opinion on the Consumer Reports piece and its main idea, that 1 ppt needs to become the new drinking water standard for PFAS. I've spoken to groups in both Carolinas, Kentucky, Tennessee, and Virginia in the last week alone.

The first questions water leaders asked were simple: "How do we deal with this? How do we inform the public that 1 ppt is an impossible standard to meet?"

Here's how.

The Consumer Report article actually isn't anything new, even when it comes to pushing the 1 ppt drinking water standard. 1 ppt has been pushed since June 2019.

That's when Dr. Linda Birnbaum announced to the world that 1 ppt should become the new drinking water standard at a national PFAS conference. The online publication The Intercept immediately reported the statement with the banner headline: [**"TEFLON TOXIN SAFETY LEVEL SHOULD BE 700 TIMES LOWER THAN CURRENT EPA GUIDELINE."**](#)

After Dr. Birnbaum's statement, activists – including ones I've partnered with on clean water issues – immediately turned to social media and blasted out that 1 ppt has been established as the new number, even attacking water utilities for poisoning the public based on the number.

Because of the attacks, pushing back on Dr. Birnbaum's statement was necessary. But it wasn't that hard to do. There were significant holes in Dr. Birnbaum's new 2019 standard and those problems are mirrored in the Consumer Reports article.

Before we get into details about our direct response, I'd like to remind you of the main point of our PFAS COMMS presentation to AWWA and other water leaders across the country. It is this. The best path to success on communicating about the issue begins with proactively communicating about how you produce safe, clean water for your communities 24/7/365.

Consistently talk to your customers, the press, community leaders, and elected officials about what you do and how you do it when it comes to delivering high-quality drinking water to their taps.

You are the water experts. As PFAS findings make news across the country, you need to remind the press and the people you serve that you are the water experts.

Now let's get to the Consumer Reports article.

The main weakness with the article is the same main weakness I used to push back against Dr. Birnbaum's statement/standard in 2019.

Back then, it was clear Dr. Birnbaum did not speak to a single person who works in public water when she came out with 1 ppt as the new standard. And it is clear Consumer Reports did not speak to anyone in the water industry for its article either.

How do we know this? First, there's the basic fact that not one water professional is mentioned in the story; they only use one sentence from a chemical industry representative to speak out against the 1 ppt "standard."

If they had spoken to a water industry professional, they would've been told – and would've had to put in the piece - that their 1 ppt standard is considered a non-detect when it comes to water testing. Below 2 ppt is considered a non-detect because, below that level, any findings are simply not reliable.

Because below 2 ppt is considered a non-detect, the 1 ppt “standard” opens up every single water utility in the country to the accusation that they have PFAS in their water, whether they have any PFAS in their water.

That’s convenient for Consumer Reports and the EWG because it makes 1 ppt an impossible standard to meet before we even discuss the science behind the “standard.” And that leads us to the second glaring weakness with the Consumer Reports story.

The second glaring weakness – which was briefly stated in the article – is the fact that the 1 ppt standard is not based on any directly-connected scientific data, it’s based on assumptions using a) one seven-year-old study and b) levels for lead, arsenic, and asbestos, which are biological contaminants not connected in makeup to PFAS.

After we pointed out Dr. Birnbaum’s “standard” was not based on directly-connected scientific data back in 2019, and we asked her to speak to the actual science, her employer at the time – National Institute of Environmental Health Sciences (NIEHS) – came out with a clarifying statement about the fact that the 1 ppt standard was based on assumptions. (We posted the statement on Twitter back in 2019; it is now at the very end of The Intercept’s story. Dr. Birnbaum retired from NIEHS a couple of months later.)

As even activists can acknowledge, using assumptions based on one study and contaminants dissimilar in makeup are simply NOT how you arrive at definitive drinking water standards.

If the data shows that a non-detectable level of PFAS – below 2 ppt – is harmful to public health, that is another story. But that data simply does not exist.

The third glaring weakness is about perspective, and how there is a disproportionate focus in drinking water instead of where most of our exposures occur, with the consumer products we use every day. It is estimated 80% of our exposure comes from consumer products.

This is a point where activists and academics agree with us. If we are stating that 1 ppt should be the drinking water standard, then we need to start banning consumer products using PFAS YESTERDAY.

But that is a lot harder to do than focusing on drinking water. That brings in political money and pushback from multiple powerful industries, including the chemical lobby.

We’ve seen some strong early steps focused on getting rid of PFAS-coated food wrappers. However, it’s what we’re wearing, sitting, and rolling around on that needs immediate change if we think 1 ppt should be the new drinking water standard.

Here are just a few things that have to go. And when you look at this list, you can see why setting an unknowable 1 ppt “standard” on water is a much easier step to take.

- Water and stain-resistant clothing. Everything that repels water, food, drink, grease, you name it, has to go. Your whole wardrobe will need to undergo a major change.
- Teflon pans. Look, we KNOW cooking on and scraping Teflon-coated pans increases our exposure to PFAS. Yet these products have not been banned; they are still everywhere because they are cheap and we love to use them.
- Furniture and carpets coated in Stainmaster treatments and similar substances. PFAS are what protects them from spills, smudges, and sweat. We sit in and walk on PFAS every day. Our kids crawl around and learn to walk on these carpets. If we believe 1 ppt should be the new drinking water standard, then we must put our furniture and carpets on the curb right now.
- Cakes and pastries we buy off of store shelves. The FDA announced in Europe that chocolate cake had 17,000 ppt of PFAS in it because the cake mix is stored in PFAS-coated bags that keep the mix from clumping.
- Dental floss. Yes, dental floss. People who use Oral-B Glide dental floss have been found to have higher levels of PFAS in their blood. Why? Because PFAS makes the floss glide through your teeth. And if you floss infrequently like I do, and draw a bit of blood, that PFAS is going right in your mouth and body.

And that's a short list; it's actually much longer.

Those who want 1 ppt to be the new drinking water standard do demand that PFAS must come out of our consumer products. But it is a more difficult fight, so they focus on water.

They know the public won't stand for banning these products. If Dr. Birnbaum and the EWG call for wide-ranging bans on consumer products they know they will lose support for their efforts. We simply love these products too much.

That's why drinking water is in the spotlight. They know we're an easy target for blame and demands for action.

Now, we can't – and shouldn't – argue with the fact these chemicals should be allowed in our water. This is why education is so important, especially from us, the people responsible for delivering safe, clean water. The first point we make during all of our water industry speeches on PFAS is that you must become and stay and GO-TO source for information about your services.

Consistent, proactive communications about how you make your water clean and safe sets up your customers, the media, and key stakeholders. If you go first with proactive communication about PFAS, you earn valuable trust at the same time you gain some control over the story.

I ran a newsroom for a couple of years. We had an old adage and it works for this issue and so many other water quality concerns: “If I hear from you first, I trust you first. If I hear from you last, I trust you last.” That trust helps you deal with the negative about PFAS.

During our PFAS communications presentation at AWWA and at all of our other national and state conferences, we close with a call to action. We must get out front of the PFAS issue now. This issue is not going away, not for years and years and years to come.

In addition to the drive to make an untenable 1 ppt the new drinking water standard, we also face what I call the “Funding Cycle.” Academics and activists – like EWG – are testing out waterways because they know they will find something; there are thousands of these chemicals in our water supplies.

We know water testing technology has improved and we are finding everything that exists in our water. The headlines that come after activists test our waters doesn’t say, “PFAS Found in Parts-Per-Trillion Amounts.” They just say, “Toxin Found in Drinking Water.”

Water utilities must prepare now and communicate about PFAS. If they do not prepare, they are playing Russian Roulette with the reputations of their utilities. They may not have to deal with PFAS next week, next month, or next year, but at some point, it’s almost certain to be found in their water.

We at WaterPIO have been leaders on this type of contamination since 2008, when pharmaceuticals were found in significant levels in our utility’s drinking water.

As we mentioned, we’ve been called in to handle PFAS panics in several states since 2017. We have tried-and-true plans and messages that have worked during the worst panics. We’re always on call for to help with any PFAS finding or with putting together a proactive communications plan.

We ONLY work with water and wastewater utilities; we do not work with the chemical industry in any way. They are the problem here, not public water.

In closing, we’ll state again we in water do not need to be on the defensive when it comes to the Consumer Reports story. We did not put these chemicals in our water. Going first and providing perspective about the subject – and yes, pushing back on unscientific standards – along with expressing the need to protect our source waters will help public water gain trust as PFAS becomes more and more of a local and national issue for us.

Feel free to drop me a line at mike@waterpio.com for our latest PFAS communications presentation or to talk about your utility getting out ahead of the issue.