Connecticut Water Works Association
Working for Quality Water

Testimony
Connecticut Water Works Association (CWWA)
Before the Environment Committee
February 18, 2009
RE: SB-871, An Act Increasing the Enforcement Authority of DEP

The Connecticut Water Works Association (CWWA) *opposes* Section 1 of SB-871, which would make it easier for the Department of Environmental Protection to issue monetary penalties of up to $100,000 against businesses – even for first-time minor violations that pose no direct risk to human health or the environment.

Water Companies are entrusted to deliver pure and adequate drinking water supplies to the citizens of the state. We take our responsibility seriously and understand and practice good stewardship skills. As businesses we operate under myriad environmental laws and regulations, including many of the same laws and regulations that DEP proposes arbitrarily increasing the noncompliance enforcement penalties for under SB-871. As raised, SB-871 would allow DEP to issue civil penalties of up to $100,000 against businesses for relatively minor violations that, in and of themselves, result in no environmental harm and are generally easily remedied.

CWWA appreciates the fact that DEP feels strict and punitive enforcement provisions are necessary to deter individuals and businesses from flouting environmental laws and regulations. And while we agree that DEP should be given reasonable enforcement tools to deter certain willful wrongdoing, SB-871 would grant DEP the latitude to impose heavy fines for such minor violations as the failure to file a report or display a registration or permit. It is as critically important that well-intentioned businesses – such as CWWA's many members – are not inadvertently and punitively punished by new enforcement provisions such as those envisaged under SB-871.

The Connecticut Water Works Association, Inc. (CWWA) is an association of private, municipal and regional public water supply utilities serving more than 500,000 customers, or population of about 2½ million people, located throughout Connecticut.

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