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April 20, 2015

Mr. Andrew Gumbel
Reporter
The Guardian

Via email: Andrew.gumbel@theguardian.com

cc: Stuart Millar, Deputy Editor
The Guardian Online
stuart.millar@theguardian.com

Dear Mr. Gumbel,

As the vice president of communications for the International Bottled Water Association (IBWA), I wanted to reach out to you directly regarding your April 19, 2015, *The Guardian* article, "[California drought spurs protest over 'unconscionable' bottled water business](#)." Because your article misinforms consumers by presenting several inaccurate arguments, I respectfully request that it be updated to ensure your readers receive factual information. Here's why.

The bottled water industry complies with California's regulatory framework, which applies to other water users in the same class, and will continue to do so. Your article clearly infers that the bottled water industry is acting out of compliance with state regulations and that is not the truth.

The 16 year-old National Resources Defense Council (NRDC) study cited in your article has been extensively rebutted and shown to be disingenuous and inaccurate. In fact, the NRDC acknowledged the study's information was out of date and [posted an update](#) to its website in July 2013, stating: "*We are pleased to report recent regulatory action based on NRDC's advocacy. Since the publication date, the FDA has agreed to more stringently regulate bottled water safety to NRDC's standards*".

For further assistance with your revision, below I present specific points that directly counter the misinformation presented in your article:

- The amount of water used for bottling water in California is very small. Bottled water uses less than 0.004 percent of all water in the U.S and similarly in California, it uses a small fraction of 1 percent. And, on average, bottled water uses only 1.32 liters of water to produce a liter of finished bottled water, including the liter consumed. The simple fact is that bottled water is neither the cause of nor the solution to the drought.
- Most of the bottled water from California sources is sold in California. It is not part of the U.S. bottled water industry's usual business model to ship bottles of water thousands of miles from where it is produced due to high transportation costs. Bottled water plants are located throughout the country and produce bottled water for customers in that area. [This map](#) shows the location of all IBWA's member company bottled water plants, which are located throughout the United States.
- Bottled water is comprehensively regulated by the U.S. Food and Drug Administration (FDA) as a packaged food product. By federal law, FDA regulations governing the safety and quality of bottled water must be at least as stringent as the U.S. Environmental Protection Agency (EPA) standards for tap water. And, in some very important cases like lead, coliform bacteria, and *E. coli*, bottled water regulations are substantially more stringent than EPA standards for tap.
- As you noted, about half of the bottled water sold in the U.S. is purified bottled water, which is often sourced from municipal water systems. However, purified bottled water is not just tap water in a bottle. Once this water enters the bottled water plant, several processes are employed to ensure that it meets the FDA purified water standard. These treatments may include one or more of the following: reverse osmosis, distillation, micro-filtration, carbon filtration, ozonation, and ultraviolet (UV) light. The finished water product is then placed in a bottle under sanitary conditions and sold to the consumer.
- According to the Beverage Marketing Corporation, the average wholesale price per gallon of domestic non-sparkling bottled water was \$1.21 in 2013. As a popular retail food product, bottled water is available at many differing price points. When alluding to differences in cost between tap and bottled water, opponents typically cite retail prices from convenience or drug stores, where prices are typically higher for all products.

It's unfortunate that you did not reach out to IBWA when preparing your story, as we would have been able to provide you with the facts about bottled water. You should know that water resource management is a very important issue to the bottled water industry, and our commitment to environmental excellence holds true wherever bottled water facilities are located. In addition, as Americans are making great efforts to choose

healthier foods and beverages, it is not in the best interest of your readers to discourage consumption of this safe, healthy, and water-efficient product. You can learn more about bottled water by visiting www.bottledwater.org.

Thank you for reading and giving these notes your attention. I am also happy to speak with you directly about this important story.

Sincerely,

Chris Hogan
Vice President of Communications
International Bottled Water Association
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