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Ms. Elizabeth Royte
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Dear Ms. Royte,

I read with interest your article, "[What's in YOUR Water?](#)" published January 30, 2014, on www.OnEarth.org, February 5, 2014, on Salon.com, and wanted to provide you with facts about bottled water that will help to better inform your readers.

It is disappointing that you continue to criticize bottled water even though you are already aware of the facts into which I am about to delve. I sincerely hope that in the future you will choose to present a more accurate and fact-based picture of bottled water and the bottled water industry. Your article contains numerous misleading and inaccurate claims about bottled water which may discourage consumers from drinking this safe, healthy, and convenient beverage.

It is also unfortunate that you are taking the crisis situation in West Virginia as an opportunity to both attack bottled water and diminish the seriousness of the Charleston-area drinking water contamination. Bottled water is not just a "stopgap measure," and certainly not in this situation. As you are aware, our industry is able to rapidly provide bottled water to those in need because of a strong and viable marketplace that exists throughout the year. Inferring that bottled water can somehow exist only for emergencies is both economically unfeasible and misleading to your readers.

Bottled Water is Comprehensively Regulated

As you well know, bottled water is comprehensively regulated by the United States Food and Drug Administration (FDA) as a packaged food product and it provides a consistently safe and reliable source of drinking water. As you stated in your article, tap water is regulated by the United States Environmental Protection Agency (EPA). However, you neglect to tell your readers that by federal law, the FDA regulations governing the safety and quality of bottled water must be at least as stringent as the EPA standards for tap water and that in some very important cases like lead, coliform bacteria, and E. coli, bottled water regulations are substantially more stringent.

The Drinking Water Research Foundation (DWRF) issued a detailed report in 2011, "[Bottled Water and Tap Water: Just the Facts](#)," that compares the quality and monitoring regulations for bottled water and

tap water, finding that both EPA and FDA have substantial monitoring and testing requirements for drinking water.

The report also found that FDA's bottled water regulations include requirements that are generally more frequent than municipal tap water systems; do not allow for averaging of test results, which is allowed with tap water; are consistent, regardless of number of consumers; are generally not subject to local monitoring waivers or reductions in test frequency; and are more frequent on a per gallon basis.

The Facts about Bottled Water Quality

The 14 year-old National Resources Defense Council (NRDC) study to which you appear to refer, has been extensively rebutted and shown to be disingenuous and inaccurate.

- The NRDC surveyed more than 1,200 bottles of bottled water, looking for roughly 57 contaminants. Throughout all of their analysis, the NRDC found not one instance of contamination that would raise a legitimate health concern. For example, the NRDC report's lengthy discussion of heterotrophic plate count (HPC) bacteria is both misleading and completely irrelevant to the safety of bottled water. HPC is found in all water and many food products, and has been studied extensively by EPA and FDA.
- The NRDC report is an extensive initiative to find fault with the bottled water sold in the United States, and a dispassionate review reveals that NRDC failed to accomplish this objective. The fact is, and the report's findings reflect, that bottled water is among the most highly regulated food products by the FDA under the Federal Food, Drug and Cosmetic Act (FFDCA) ("FFDCA," 21 U.S.C. s. 301 et seq.).

If the Environmental Working Group (EWG) report to which you refer in your article is its 2008 bottled water study, that has long been discredited as biased and misleading. The results of the EWG study were based on the faulty premise that if any substance is present in a bottled water product — even if it doesn't exceed the established regulatory limit or no standard has been set — then it is a health concern.

The EWG report did not show any correlation between the levels of substances found in the bottled water brands tested and any potential adverse health effects. Moreover, the EWG report provides results from a market basket testing program that the EWG conducted on 10 brands of bottled water in nine states and the District of Columbia. That is certainly not a representative sample of bottled water products — which the EWG report acknowledged.

It is unfortunate that once again you feel the need to frame your article as a tap water versus bottled water issue. IBWA thinks that if people are drinking water — whether tap, bottled, or filtered — that's a good thing. However, since you raised the issue, I must inform you that when subjected to an actual analysis of contamination, boil alerts, and compromised water supplies, both statements made in your article are simply not accurate and misinform the public.

As noted in the 2013 DWRF report, "[Microbial Health Risks of Regulated Drinking Waters in the United States](#)," researchers estimate that more than 500 boil alerts occurred in the United States in 2010. In addition, the Centers for Disease Control and Prevention (CDC) reports that waterborne diseases, such as Cryptosporidiosis and Giardiasis, cost the U.S. healthcare system as much as \$539 million a year in hospital expenses.

In 2006, EPA researchers reported an estimated 16.4 million cases of acute gastrointestinal illness per year are caused by tap water. Subsequent research has estimated that number of illnesses to be closer to 19.5 million cases per year.

In contrast, a survey of state bottled water regulatory authorities, dated June 2009 and conducted by the Government Accountability Office (GAO), found there were zero outbreaks of foodborne illness from bottled water over a 5-year period. Moreover, in testimony before a July 9, 2009, Congressional hearing, an FDA official stated that the agency was aware of no major outbreaks of illness or serious safety concerns associated with bottled water in the past decade.

All bottled water products – whether from groundwater or public water sources – are produced utilizing a multi-barrier approach. From source to finished product, this helps prevent possible harmful contamination to the finished product as well as storage, production, and transportation equipment. Many of the steps in a multi-barrier system are effective in safeguarding bottled water from microbiological and other contamination. Measures in a multi-barrier approach may include one or more of the following: source protection, source monitoring, reverse osmosis, distillation, micro-filtration, carbon filtration, ozonation, and ultraviolet (UV) light.

Consumer Information

Consumers have many options when deciding which bottled water brand to drink. If a bottled water company does not provide the information that a consumer requests, he or she can choose another brand. That is not the case with their public water system. Consumers cannot make a choice of which municipal water is piped into their homes. And that is the fundamental issue: consumer choice. Unfortunately, many people want to make this a bottled-water versus tap-water issue. But we just don't see it that way. If people are drinking water – whether tap or bottled – that is a good thing and consumers should be free to choose. In fact, most consumers who drink bottled water also choose to drink tap water.

Regarding your claim that consumers have little to no access to bottled water quality information, the bottled water industry supports a consumer's right to clear, accurate, and comprehensive information about the bottled water products they purchase. All packaged foods and beverages, including bottled water, are subject to extensive FDA labeling requirements that provide consumers with a great deal of product quality information. In addition, virtually all bottled water products include a telephone number on the label that consumers can use to contact the company to obtain information about the product.

IBWA believes that the most feasible mechanism for consumers to obtain information not already on the label is through a request to the bottler.

Support for Public Water Systems

While your article characterized this as bottled water versus tap water conflict, the bottled water industry supports a strong public water system, which is important for providing citizens with clean and safe drinking water. In fact, as you note, many bottled water companies use public water sources for their products. Once the water enters the bottled water plant several processes are employed to ensure that it meets the purified standard of the U.S. Pharmacopeia 23rd Revision. These treatments can include utilizing a multi-barrier approach. Measures in a multi-barrier approach 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.

If a bottled water product's source is a public water system and the finished bottled water product does not meet the FDA Standard of Identity for purified water, the product label must disclose the public water system source.

Moreover, the water from public water systems is often compromised after emergency situations or natural disasters (e.g., hurricanes, floods, tornados, fires, or boil alerts). During these times, bottled water is a necessary and reliable alternative to deliver clean, safe drinking water. However, tap water does provide in most cases a safe source of drinking water, even if occasional system failures make it necessary for consumers to search for alternatives during these times.

To claim that the availability of bottled water in the marketplace somehow affects the infrastructure, funding, development, and maintenance of municipal water systems is completely unfounded.

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You continue to misinform consumers in a way that could deter them from consuming bottled water -- one of the safest, healthiest and environmentally friendly packaged beverages on the shelf. I request that you correct your story and remove the false information so that it does not mislead consumers about bottled water.

I also would welcome the opportunity to discuss with you any of the above points, or any other bottled water-related issues.

Sincerely,

(sent electronically)

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