IBWA Comment:

Bottled water is always there when you need it, particularly during natural disasters and emergencies. As you noted, most recently, the industry was able to provide the citizens of Toledo, Ohio, with safe, clean, bottled water when the public water system was contaminated by a toxin from an algae bloom in Lake Erie.

Contrary to what this article suggests, there is no confusion about the quality, safety, or reliability of bottled water. Bottled water is comprehensively regulated by the FDA as a packaged food product and it provides a consistently safe and reliable source of drinking water. 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, in some very important cases like lead, coliform bacteria, and E. coli, bottled water regulations are substantially more stringent. The FDA sets very specific definitions for all types of bottled water, including spring, purified, artesian, mineral, and sparkling.

You also make several comments about how some bottled waters companies use municipal water sources. In virtually all instances, this municipal source water is used to produce purified bottled water. However, it is important to note that purified bottled water is not just tap water in a bottle. Once that water enters the bottled water plant, several processes are employed to ensure that it meets the FDA’s purified water standard. As you noted, these treatments can include reverse osmosis, micron and carbon filtration, ultraviolet light, and ozonation. 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.

In addition, the recently introduced Bottled Water Quality Information Act (H.R. 4978) would provide consumers with uniform information about the quality and safety of their bottled water products. In particular, it would require all bottled water products to include the source type (e.g., public water
system, spring, mineral, artesian, well) on the label. IBWA strongly supports this important bill, which will make it easier for consumers to obtain clear, consistent, and comprehensive information about the bottled water products they buy.

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 or website on the label that consumers can use to contact the company to obtain information about the product. Moreover, any product label statements or advertisements that are found to be false or misleading may be subject to federal and state anti-fraud laws.

Lastly, the 15 year-old NRDC study that you cite has been extensively rebutted and shown to be disingenuous and inaccurate. Consumers who choose to drink bottled water can rely on its consistent record of safety and quality.

Readers can learn more about bottled water at www.bottledwater.org.