June 20, 2014

Mr. Clark Howard  
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Dear Mr. Howard,


It is unfortunate that you didn’t contact the International Bottled Water Association (IBWA), as it would have helped you provide a more accurate article for your readers.

Bottled water is comprehensively regulated by the United States Food and Drug Administration (FDA) as a packaged food product. By federal law, the 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 public water systems. And, in some very important cases like lead, coliform bacteria, and E. coli, bottled water regulations are substantially more stringent.

**Bottled Water is Not Just Tap Water in a Bottle**  
Purified bottled water, typically sourced from municipal water systems, is not just tap water in a bottle as you state. The bottled water industry supports a strong public water system, which is important for providing citizens with clean and safe drinking water. In fact, many bottled water companies use public water sources for their purified bottled water products.

Once this 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 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.

**Bottled Water Price**  
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 often cite retail prices from convenience or drug stores, where bottled water prices are typically higher.
However, according to the Beverage Marketing Corporation (BMC), the average wholesale price per gallon of domestic non-sparkling bottled water was $1.13 in 2012 (the most recent available data).

BMC also notes that research shows consumers most often tend to buy bottled water in bulk from supermarkets or large discount retailers as they often prefer to purchase bottled water in cost-saving volume.

**Bottled Water Containers are Safe**

Your readers might also infer from your comments that bottled water bottles contain BPA, which is not true. PET plastic never contains BPA. PET plastic bottles, commonly small, portable 16.9 (half-liter) and 24 ounce sizes, are safe and reliable for food contact use. PET is used in a variety of packaging for many foods, including everything from peanut butter, soft drinks, and juices to beer, wine, and spirits. PET is approved as safe for food and beverage contact by the FDA and similar regulatory agencies throughout the world, and has been for over 30 years.

Even though PET plastic does not contain BPA, regulatory agencies in several countries and the FDA have ruled favorably on the safety of BPA. The consensus among these international regulatory agencies is that the current levels of exposure to BPA through food packaging and does not pose a health risk.

**Bottled Water and Fluoride**

Additionally, you infer that bottled water causes tooth decay, which is false and misleading.

There are many sources of fluoride, and the amount of fluoride exposure varies greatly by community and individual. Approximately two-thirds of communities in the United States fluoridate their public drinking water supplies. Those who live in communities that do not fluoridate public drinking water, who get their drinking water from wells, or who filter their fluoridated tap water will not be getting fluoride in their drinking water. Fluoride is present in many foods and beverages and almost all toothpaste contains fluoride. Too much exposure to fluoride can lead to a condition called fluorosis, which results in stains to the teeth. Consumers should therefore look at how much fluoride they are receiving as part of an overall diet and should contact their health-care provider or dental-care provider for their recommendation.

Bottled water companies must follow fluoride labeling requirements should fluoride be added to the product. In addition, the FDA sets limits on the amount of fluoride in bottled water, whether added or naturally occurring (21C.F.R. §165.110(b)(4)(ii)(A-D)).

For consumers who want fluoride in their drinking water and wish to choose bottled water, approximately 20 IBWA member companies make clearly-labeled fluoridated bottled water products under stringent FDA guidelines. For a complete list of these brands, which are available in many markets across the country, please visit IBWA’s website.
You are misinforming 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,

Chris Hogan
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