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January 8, 2015

The Daily Meal

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Dear Mr. Andrews and Mr. Bovino,

I read with interest your slideshow "[10 Reasons You Shouldn't Drink Bottled Water](#)" on The Daily Meal website. I am writing to make you aware of several serious errors in the statements that accompany this slideshow. It is unfortunate that The Daily Meal didn't reach out to the International Bottled Water Association, as it would have helped provide a more accurate article about bottled water.

Specifically, here is a summary of the statements that are factually incorrect.

Slide 1: *It's Probably Just Tap Water Anyway. According to both government and industry estimates, approximately 40 percent of bottled water comes from city and municipal water reserves. Sometimes it's additionally treated, but sometimes it's not.*

FACT: Purified bottled water, typically sourced from municipal water systems, 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 U.S. Food and Drug Administration's (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.

Slide 2: *There's No One Assessing it for Quality. 60 to 70 percent of percent of bottled water sold in the U.S. is exempt from the FDA's rigorous water standards because the FDA says its rules do not apply to water packaged and sold in the same state.*

FACT: That statement is completely false and misleading. FDA's jurisdiction over bottled water products (and any other product regulated by FDA) extends not only to those products that move in interstate commerce but also to those products sold within a single state that are enclosed in packaging materials that have moved in interstate commerce. In the case of bottled water, if the plastic used in the bottles, the plastic used in the caps, the paper and ink used on the labels, any other outer packaging materials, and even the water itself comes from out of state, then FDA has jurisdiction over that product. And in today's commercial society, that will almost always be the case. Congress has recognized this fact by enacting a law that expressly presumes that all food and beverage products are sold in interstate commerce. (21 U.S.C. § 379 (a)).

Slide 3: *It Could Contain E. Coli. While it's not in companies' best interests to sell water full of E. coli to consumers, there's no law saying they can't. Federal law states that city tap water can contain no E. coli or fecal coliform bacteria, yet no such law exists for bottled water.*

FACT: Bottled water is comprehensively regulated by the FDA as a packaged food product. Tap water is regulated by the United States Environmental Protection Agency (EPA). 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.

In fact, bottled water [standards of quality rule \(21 CFR part 165\)](#) states that if *Escherichia coli* (*E. coli*) is present in bottled water, then the bottled water will be deemed adulterated, and cannot be sold to consumers.

Slide 4: *Cities are Required to Tell You What's in Your Water. Federal law mandates that cities must release annual "right to know" reports about the contents of drinking water; bottlers are under no such obligation.*

FACT: IBWA 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 or website on the label that consumers can use to contact the company to obtain information about the product.

Disclosures, such as those required by the EPA in Consumer Confidence Reports (CCRs) for public water systems, are not required of any packaged food or beverage product. Those products must meet all applicable safety standards and must be manufactured according to FDA regulations. However, bottled water companies voluntarily provide consumers with access to information about their products.

Consumers have multiple choices in brands of bottled water. That is not the case with their public water system. Consumers cannot make a choice of which municipal water is piped into their homes. If a bottled water company does not satisfy a consumer's request for more information, that consumer can, and should, choose another brand.

Slide 5: *Making Bottles Wastes Water. It takes three times as much water to make one plastic bottle as it does to fill it.*

FACT: Actually, only 1.32 liters of water (including the liter of water consumed) is used to produce one liter of finished bottled water. In fact, bottled water has the [lowest water footprint](#) of all packaged beverages.

Slide 6: *We're Filling The Oceans With Plastic. The Ocean Conservancy has found that every square mile of the ocean has 46,000 pieces of floating plastic in it. Plastic bottles and plastic bags are the two most prevalent forms of plastic waste.*

FACT: While it is the case that plastic debris in oceans is a serious concern, it is false and misleading to infer that the bottled water industry is to blame. The plastics used to make bottled water containers make up only a small sliver (less than 1%) of all plastic produced. Moreover, there is strong evidence that [ship waste dumping of trash](#) is a serious problem that is not improving. These ships dump a vast array of industrial plastics – including commercial food containers, industry containers, and buckets. Commercial fishing debris is another large source of debris. Getting rid of bottled water would have little if any impact on the world's oceans.

You may also be interested to know, when we went to the [Ocean Conservancy](#) website (presumably the site you meant to refer to when you wrote "Ocean Conservatory") and searched for "46,000" it returned just 5 results – all for articles talking about, "46,000 miles of lobster fishing line," not bottled water.

Slide 7: *You Probably Can't Recycle it. Only bottles made of polyethylene terephthalate can be recycled, which means four out of five water bottles are sent to landfills or tossed into the ocean.*

FACT: This statement is patently false and ill-informed. All bottled water containers are 100% recyclable. Now at 38.04%, the recycling rate for single-serve PET plastic bottled water containers more than doubled between 2003 and 2012. PET plastic bottled water containers are also the most frequently recycled PET beverage container in curbside recycling programs.

Slide 8: *Your Bottle Is Going To Outlive Your Great-Great-Grandchildren. Each convenient little bottle of water takes 1,000 years to biodegrade, and they produce toxic fumes if they're incinerated.*

FACT: As already noted, all bottled water containers are 100% recyclable. PET plastic is [extremely recyclable](#), providing an effective and efficient means of recapturing and reusing the energy and resources of its raw materials.

Slide 9: *It's A Rip-Off. Bottled water costs roughly 1,000 times the price of a glass of tap water, and that's counting the cost of a home water filter.*

FACT: Bottled water competes with other packaged beverages, not tap water. In fact, most people who drink bottled water also drink tap water. 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 bottled water prices are typically higher.

According to the Beverage Marketing Corporation (BMC), the average wholesale price per gallon of domestic non-sparkling bottled water was \$1.21 in 2014. 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.

Slide 10: *You Probably Can't Taste the Difference Anyway. Last May, Good Morning America gave their audience a blind taste test using New York City tap water, Poland Spring, O-2 Oxygenated Water, and Evian. The clear winner was New York City tap water with 45 percent of the vote*

FACT: Consumers choose bottled water for many reasons, including its refreshing taste, reliable quality, zero calories and additives, and convenience.

And consumers are speaking in a clear voice; building on 2013's growth, bottled water again posted significant increases in both sales and consumption for 2014. Even as other beverages struggle to gain or maintain market share, bottled water had a 7.4% increase in consumption in 2014. Sales of bottled water in 2014 grew to \$13 billion (wholesale dollars), an increase of 6.1 percent from 2013.

Also, your slide's statement is actually misleading; 45% is less than half, so it's a misstatement to say that tap water was the "clear winner." Full GMA story details are available [here](#).

We believe that it is not in the best interest of your readers to discourage the consumption of this safe, healthy, convenient product.

I respectfully request the slide show on your website either be removed or updated to reflect the facts mentioned above, as the article as it currently appears, seriously misinforms consumers about the safety and quality of bottled water.

Sincerely,

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