

## **International Bottled Water Association**

### **Statement Regarding Consumer Reports' November 2019 Article "Should We Break Our Bottled Water Habit?"**

The International Bottled Water Association (IBWA) provided Consumer Reports (CR) with a lot of information for the article "Should We Break Our Bottled Water Habit?," which was published in the November 2019 issue of CR. We are disappointed that CR chose to omit several facts that would have provided a more balanced story. The anti-bottled water tone of the article is a disservice to CR readers and the general public, as they are being misinformed about the facts behind the growth of bottled water sales, as well as product quality, safety, and regulation.

Bottled water, as a packaged food product, is strictly and comprehensively regulated by the U.S. Food and Drug Administration (FDA). All bottled water products are produced utilizing a multi-barrier approach. From source to finished product, a multi-barrier approach helps prevent possible harmful contamination to the finished product as well as to 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. The bottled water industry is committed to providing consumers with the safest and highest quality products.

#### **The So-called War Against Tap Water**

Contrary to what Consumer Reports says, the bottled water industry is not participating in a war against tap water. As our nation faces increasingly high rates of obesity, diabetes, and heart disease, it is very important for people to drink water—whether from the tap, filtered, or bottled—instead of sugary drinks. And it is important to note that most people (74%) drink both tap water and bottled water, according results of a [2018 Harris Poll](#).

Bottled water is a healthy packaged beverage product and we don't view tap water as our competition. Instead, bottled water competes in the marketplace against carbonated soft drinks and other sugar sweetened beverages. In fact, since 2006, 69 percent of the growth in bottled water consumption has come from people shifting away from carbonated soft drinks and fruit drinks to water. See this [consumption shift chart](#):  
(<https://www.bottledwater.org/public/Bottled%20Water%20Fewer%20Caloric%20Drinks.png>)

The bottled water industry supports a strong public water system, which is important for providing citizens with clean and safe drinking water. In addition, many bottled water companies use public water sources for their purified bottled water products. However, it is important to note that this is not "just tap water in a bottle." Once the tap water enters the bottled water plant, several processes are employed to ensure that it meets the FDA standard for purified water. "Filtered municipal-sourced water" is significantly different than "tap water in a bottle." The chemical and physical quality of purified bottled water is not the same as water that comes out of the tap. Here's why: Once tap water enters a bottled water plant, several processes are employed to ensure that it meets the standard for purified water in the U.S. Pharmacopeia, 23<sup>rd</sup> 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. If the finished water does not meet strict FDA regulations, then it is deemed adulterated and subject to recall.

During natural disasters or emergencies, when the safety and quality of public drinking water is often compromised, people rely on store-bought or emergency relief bottled water. The Federal Emergency Management Agency (FEMA) specifically recommends that store-bought bottled water be part of peoples' supplies; at least 1 gallon per-person, per-day for three days. Storing bottled water is a safe, convenient way to ensure that you have an adequate supply of water on hand.

Bottled water is always there when it is needed. However, the efforts of the bottled water industry to provide crucial drinking water to citizens afflicted by floods, hurricanes, wildfires, and boil alerts are contingent on an ongoing viable commercial market. This provides bottled water companies with the infrastructure and capital resources to respond immediately when needed. The bottled water industry cannot exist only for disaster response as some industry critics have advocated. The importance and value of these efforts are often only fully understood when people need bottled water the most.

To discourage the use of bottled water or make false or misleading statements about the safety of bottled water, does a disservice to consumers. Provided below are some more bottled water facts that Consumer Reports had, but decided not to use in its article.

1. CR claims: "Information about bottled water quality is hard to find."

Fact: Virtually all bottled water products include a phone number and/or a website address on the label that consumers can use to contact the company to ask about its water quality report. This contact information allows consumers to

get any additional information that they may want that is not already on the label. This could include treatment and quality information.

Consumers have many choices when purchasing a bottled water product. If a consumer contacts a bottled water company for additional information about their bottled water brand and doesn't get what they need, the consumer can, and should, choose a brand of bottled water that provides the requested information.

2. CR claims that tap water is more stringently regulated than bottled water.

Fact: As mentioned earlier, bottled water is comprehensively regulated as a food product by FDA. In fact, federal law requires that FDA's bottled water regulations be as protective of the public health as the U.S. Environmental Protection Agency's (EPA) standards for tap water. Moreover, on a gallon-for-gallon basis, bottled water is required by law to be tested for safety at least 30 times more often than tap water. In addition, every bottle of bottled water is required to meet all FDA regulations. However, some EPA tap water standards allow test results to be averaged over an entire year, which means that consumers could be exposed to contaminants that exceed the EPA Maximum Contaminant Level (MCL).

In some cases, FDA standards for bottled water are more stringent than EPA tap water regulations. For example, EPA has set a lead "action level" for tap water at 15 parts per billion (ppb). For bottled water, the FDA lead limit is set at 5 ppb.

Source: <https://www.fda.gov/consumers/consumer-updates/bottled-water-everywhere-keeping-it-safe>

3. CR claims that plastics aren't safe and contain harmful chemicals.

Fact: As with all food packaging materials, bottled water containers must be made from food contact substances approved by FDA. This means the plastic and glass containers used for bottled water products have undergone FDA scrutiny prior to being available for use in the marketplace. FDA has determined that containers used by the bottled water industry are safe for use with food and beverage products—including bottled water—and they do not pose a health risk to consumers. In addition, the single-serve bottled water products that are packaged in PET plastic containers do not contain ingredients capable of producing dangerous substances under conditions of normal use, including being subjected to hot temperatures. For more than 30 years, PET plastic has been approved as safe for food and beverage contact by FDA and similar regulatory agencies throughout the world. PET plastic is used in containers for many other beverages, including soft drinks, juices, beer, wine, and spirits.

4. CR claims bottled water is harmful to the environment.

Fact: Bottled water has the smallest environmental footprint of all packaged beverages.

- The results of a 2018 IBWA benchmarking study show that the amount of water and energy used to produce bottled water products in North America is less than all other types of packaged beverages. On average, only 1.39 liters of water (including the liter of water consumed) and 0.24 mega joules of energy are used to produce one liter of finished bottled water.
- All bottled water containers are 100 percent recyclable, and PET plastic is the most commonly recognized and recycled plastic in the world. PET plastic can be easily recycled over and over again (*napcor.com/frequently-asked-questions*), and recycled PET (rPET) is a valuable resource that is in high demand. The bottled water industry supports strong community recycling initiatives and recognize that a continued focus on increased recycling is important for everyone. In addition, bottled water containers are the most common item in curbside recycling programs. Bottled water containers make up 54.6 percent of the PET plastic collected in curbside systems throughout the United States. Soda bottles make up only 14.7 percent of the PET plastic collected in curbside programs, according to the National Association for PET Container Resources (Source: [https://napcor.com/wp-content/uploads/2018/11/NAPCOR\\_2017RateReport\\_FINAL.pdf](https://napcor.com/wp-content/uploads/2018/11/NAPCOR_2017RateReport_FINAL.pdf)). And the industry is always looking for ways to strengthen existing recycling programs and help to expand recycling efforts ever further. However, even when they are not properly recycled, bottled water containers make up only 3.3 percent of all drink packaging in U.S. landfills. Carbonated soft drink containers make up 13.3 percent; and aluminum cans make up 7.9 percent. Bottled water also has the lowest water- and energy-use ratios of all packaged beverages. As mentioned earlier, on average, it takes only 1.39 liters of water to produce 1 liter of finished bottled water (including the liter of water consumed), which is the lowest water-use ratio of any packaged beverage product. And on average, only 0.24 mega joules of energy are used to produce 1 liter of bottle of water.
- Continual light-weighting of PET plastic packaging has seen the average weight drop to 9.25 grams per 16.9 ounce single-serve container. That is almost one-third less than the amount of PET it takes to make carbonated soft drink and other beverage containers, which need to be thicker due to carbonation and manufacturing processes and weigh, on average, 23.9 grams. According to the Beverage Marketing Corporation, between 2000 and 2014, the average weight of a 16.9-ounce (half-liter)

PET plastic bottled water container declined 51 percent. This resulted in a savings of 6.2 billion pounds of PET resin.

- While bottled water is just one of thousands of consumer items packaged in plastic, the bottled water industry has also gone to great lengths to reduce the environmental impact of its packaging, including developing new technologies in product packaging such as the use of recycled content, reduction of plastic used in caps and shrink-wrapping, and reduction of paper used in labels and shipping cardboard. IBWA member companies are increasing their use of rPET, and many bottled water companies already use bottles made from 50, 75, and, in some cases, 100 percent rPET. Furthermore, the bottled water industry is continually developing additional ways to reduce its environmental footprint from production to distribution to consumption. This includes development of “green” bottling facilities, as well as utilization of more fuel-efficient means of producing and transporting product to market.
- Compared to other industries (e.g., agriculture, livestock, public supply), bottled water uses a very small amount of water—just 0.011 percent of all water used in the United States and 0.02 percent of all groundwater used.
- The decision to set up a bottling facility is one that is made only after the water source’s sustainability and the plant’s potential environmental impact have been thoroughly analyzed. To that end, bottled water companies take steps such as buying and protecting the land area surrounding the water source and facility, monitoring and measuring water use and withdrawals, and reducing the amount of water used in production. In many cases, state or local governments set limitations on water withdrawals to protect the sources. If a bottler uses a municipal water source, it is able to do so because the city has excess water capacity and wants to sell it to help pay for operating expenses and providing services to its citizens without needing to raise taxes. Like all commercial water users—bottled water companies must pay for the water they use.
- Consumer Reports suggests that “cardboard cartons” are a more environmentally friendly option for packaging water; however, these boxes are really laminated layers of paper, aluminum, and plastic, and are not easily recyclable. Therefore, this packaging material is less environmentally friendly compared to 100 percent recyclable PET plastic containers, which are also the most recognizable and recycled containers in the world. See this [infographic](#), which compares the footprints of the most common drink packaging types:

<https://www.bottledwater.org/public/Packaging%20infographic%20WEB%20sm.pdf>

5. CR claims bottled water plant safety inspections are declining.

Fact: Under the Food Safety Modernization Act (FSMA), which was enacted in 2011, FDA is ranking food products by risk and determining frequencies of inspections based on that risk level. Bottled water is considered by FDA to be a low risk for food safety. FDA allocates inspection resources according to the risk profiles of facilities, which would take into account the type of food, the facility's history of recalls and violations, the rigor of the facility's hazard analysis and risk-based preventive controls, and other criteria as deemed appropriate.

Under FSMA, domestic food facilities designated as high risk must be inspected not less than once every three years and domestic food facilities determined not to be high risk (which includes bottled water) must be inspected not less than once every five years. It should also be noted that in meeting this domestic inspection frequency requirement, FDA may rely on inspections conducted by other Federal, State, or local agencies. And many state regulatory agencies inspect bottled water plants annually.

In addition to complying with all FDA regulations, IBWA member bottlers must adhere to the IBWA Bottled Water Code of Practice, which mandates additional standards and practices that in some cases are more stringent than federal and state regulations. A key feature of the IBWA Bottled Water Code of Practice is a requirement that all IBWA bottlers must undergo a mandatory annual plant inspection conducted by an independent, third-party organization.

6. CR claims: "A 1999 study by the Natural Resources Defense Council . . . found that 1 in 4 [brands] violated California limits for arsenic and other carcinogenic compounds."

Fact: The 20-year-old NRDC report has long been extensively and exhaustively debunked by scientists, who found flaws and misinformation in the NRDC report. The Drinking Water Research Foundation, in its review of the NRDC report found: "[Of] more than 1,200 bottles of bottled water [tested] for 57 contaminants . . . the survey could only find four results where federal health standards were exceeded. Closer inspection reveals that two results . . . were in fact quite likely false positives because they could not be replicated in subsequent tests as required by federal standards. The other two exceedances were for a fluoride standard . . . [and] the levels found in the bottled water are below the EPA health-based fluoride standard for public water systems.

Any bottled water product that doesn't meet an FDA or applicable state Standard of Quality is considered misbranded and adulterated, and it should not be allowed to be sold. Such products are subject to FDA enforcement actions, including recalls, warning letters, and product seizures. This helps ensure that adulterated or mislabeled products do not reach consumers.

7. CR claims: "bottled water is not a long-term solution to the nation's drinking water problem."

Fact: The bottled water industry agrees with this statement, and, as mentioned earlier, the industry supports a strong public water system, which is important for providing citizens with clean and safe drinking water. In fact, IBWA strongly endorsed the Water Resources Reform and Development Act of 2014, which supported a strong American public water infrastructure and created the Water Infrastructure Finance and Innovation Authority (WIFIA). That program provides low-interest federal loans to communities, which reduces the cost of financing large water and wastewater infrastructure projects. The ongoing debate on this issue a result of decades of insufficient infrastructure spending.

Bottled water is the No. 1 packaged beverage product in the United States (by volume) for the third year in a row. Consumers choose bottled water because it is a safe, healthy, and convenient product that tastes great and helps them stay hydrated.

For more information about bottled water, visit IBWA's website: [www.bottledwater.org](http://www.bottledwater.org).

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*The International Bottled Water Association (IBWA) is the authoritative source of information about all types of bottled waters, including spring, mineral, purified, artesian, and sparkling. Founded in 1958, IBWA's membership includes U.S. and international bottlers, distributors and suppliers. IBWA is committed to working with the U.S. Food and Drug Administration (FDA), which regulates bottled water as a packaged food product, to set comprehensive and stringent standards for safe, high-quality bottled water products.*

*In addition to FDA regulations, IBWA member bottlers must adhere to the IBWA Bottled Water Code of Practice, which mandates additional standards and practices that in some cases are more stringent than federal and state regulations. A key feature of the IBWA Bottled Water Code of Practice is a mandatory annual plant inspection by an independent, third-party organization.*

*IBWA is proud to be a partner with Keep America Beautiful and a supporter of Drink Up, an initiative of former First Lady Michelle Obama and the Partnership for a Healthier America (PHA), which encourages Americans to drink more water more often – whether from the tap, a filter, or in a bottle. Choosing water is always the healthy choice.*