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Owner/editor
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Dear Owner/Editor,

I have concerns regarding the article, "5 Reasons To Never Drink Bottled Water Again" published recently on your website OrganicHealth.co, as much of the information is either misleading or factually incorrect. As an industry expert, I am offering to assist in correcting this misinformation.

As a new website owner, you may or may not be aware that marketing and advertising content online is regulated by the Federal Trade Commission, which has strict guidelines regarding the accuracy of electronic marketing.

My concern is that the falsehoods contained in this article could be viewed as "misleading consumers", which is a violation of the Federal Trade Commission Act. In this Act, Section 5 states: the Commission has determined that: "a representation, omission or practice is deceptive if it is likely to: mislead consumers and affect consumers' behavior or decisions about the product or service." (see rule here: <http://www.business.ftc.gov/documents/bus28-advertising-and-marketing-internet-rules-road>)

We believe the aforementioned article on your website does this in a number of ways:

1. Bottled Water is Comprehensively Regulated

Virtually 100% of all bottled water produced in the United States 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.

Your article states 70% of bottled water is exempt from FDA oversight, which is factually incorrect. This misleads consumers.

Also, by federal law bottled water is held to the same stringent standards as tap water, and in some very important cases such as 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 (see: [http://www.thefactsaboutwater.org/uploads/BW PWS Just the Facts 2011 rev 0314 Enc.pdf](http://www.thefactsaboutwater.org/uploads/BW_PWS_Just_the_Facts_2011_rev_0314_Enc.pdf))

2. Bottled Water Does Not Cause Infertility or Cancer

Your article makes these claims, but does not substantiate either statement, both of which are untrue. The article incorrectly links phthalates with PET packaging. Phthalates are not a chemical component of PET (see: http://www.petresin.org/science_behindpet.asp). And the idea that bottled water packaged in PET plastic causes cancer is a well-known urban myth that has been debunked by several organizations including scientists at John Hopkins University (see: www.jhsph.edu/news/stories/2004/halden-dioxins-two.html).

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 U.S. Food and Drug Administration (FDA) and similar regulatory agencies throughout the world, and has been for more than 30 years.

This false claim in your article misleads consumers and could affect their behavior toward bottled water.

3. Bottled water has the lowest carbon and water footprint of all packaged drinks

Your article makes the false claim that bottled water doesn't have a good carbon footprint. This is simply untrue. All bottled water products are 100% recyclable. And the BIERS (Beverage Industry Environmental Roundtable report) clearly states that bottled water has the lowest water and energy use of all packaged beverages. (see: <http://3blmedia.com/News/Beverage-Industry-Continues-Drive-Improvement-Water-and-Energy-Use>)

In addition, the (20%) recycling rate stated in your article is factually incorrect. Data from the National Association for PET Container Resources (NAPCOR) and the Beverage Marketing Corporation (BMC) show the bottled water industry continuing to reduce its environmental footprint through significant increases in recycling and the use of less plastic in single-serve PET bottled water containers. According to NAPCOR, the recycling rate for single-serve PET plastic bottled water containers is now at almost 39 percent, and has more than doubled in the last seven years. And, BMC found that over the last 11 years the average weight of a 16.9 ounce (half-liter) single-serve PET plastic bottled water container has dropped by almost 47.8 percent, to 9.9 grams. Another fact worth noting: of all the plastics produced in the United States, PET plastic bottled water packaging makes up only 0.91 percent; less than one percent.

This false claim in your article misleads consumers and could affect their behavior toward bottled water.

4. Support for Public Water Systems

While your article characterizes a bottled water vs. 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, many bottled water companies use public water sources

for their products. In the case of purified drinking water, 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, as previously described. The finished water product is then placed in a bottle under sanitary conditions and sold to the consumer.

Tap water, in most cases, provides a safe source of drinking water, but can be compromised after emergency situations, such as the recent chemical leak in West Virginia, with which your article leads, commonplace water main breaks or boil alerts, or natural disasters (e.g., hurricanes, floods, tornados, or fires). During these times, bottled water is a necessary and reliable alternative to deliver clean, safe drinking water.

5. Bottled Water is Reasonably Priced and Ethical

Most people consume bottled water instead of other packaged drinks, and a lot of these people purchase it in bulk – either by the single-serve PET case or home and office 3 and 5 gallon bottles. BMC says the average cost of bottled water in the United States is \$1.21 per gallon.

While it is true that there are many people in the world who do not have access to clean drinking water, it is unreasonable to draw a link to and/or establish blame on the bottled water industry. In some parts of the world providing access to clean drinking water for local governments is a complex issue, one that cannot be solved in a short timeframe. In the interim bottled water is providing a safe and reliable drinking water option, without which there would be dire outcomes for populations in many regions. Simply put: getting rid of bottled water will not improve drinking water quality in developing countries.

What should you do?

Bottled water is the healthiest, calorie-free beverage on the shelf. One of the simplest changes a person seeking a healthier lifestyle can make is to switch to drinking water – tap or bottled -- instead of other beverages that are heavy with sugar and calories. In fact, a November 2013 U.S. Centers for Disease Control and Prevention (CDC) report, [Obesity – United States, 1999–2010](#), noted that one important way to help reduce rates of obesity includes making healthy choices, and for those who want to eliminate or moderate calories, sugar, caffeine, artificial flavors or colors, and other ingredients from their diet, choosing water is the right choice.

For Americans on-the-go bottled water gives people easy access to water. In fact more than 40 percent of water consumed in the U.S. is in a bottle. If bottled water consumption is discouraged, what choice will that person standing at a vending machine or beverage shelf in a store make? Research shows that if bottled water isn't available, 63 percent of people will choose soda or another sugared drink – not tap water.

Your website is 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.

Thank you for your attention to this matter, and as mentioned earlier, I am happy to assist further should you have questions concerning any of the above points, or any other bottled water-related issues. Feel free to contact me on the phone number listed below.

Sincerely,

(sent electronically)

Chris Hogan
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