



1700 Diagonal Road, Suite 650
Alexandria, VA 22314
Phone: 703-647-4609
Fax: 703-683-4074
Web: www.bottledwater.org

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Phil Boas – News & Editorial Director
The Arizona Republic
PO Box 1950
Phoenix, AZ 85001

newstips@arizonarepublic.com
phil.boas@arizonarepublic.com

Dear Mr. Boas,

I'm writing in regard to Jenna Miller's (Cronkite News) article "Bottled water No. 1 drink choice in U.S., but tap water likely safer" (www.azcentral.com/story/news/local/arizona/2018/01/03/bottled-water-no-1-drink-choice-u-s-but-tap-water-likely-safer/999935001) published on www.azcentral.com on January 3, 2018. We are concerned that this article misinforms your readers about the safety of bottled water.

In Ms. Miller's article, she quotes Arizona State University professor Elizabeth Graffy as saying: "You should be able to trust tap water more than bottled water . . . Bottled water is actually not regulated the same as tap water," which is a misleading statement. The fact is, as a packaged food product, bottled water is strictly regulated by the U.S. Food and Drug Administration (FDA), and Federal law requires that FDA bottled water regulations be as protective of the public health as standards set by the Environmental Protection Agency (EPA) for tap water. In fact, in some cases, such as lead, the FDA bottled water regulations are more stringent than the EPA tap water standards.

In addition, Ms. Miller's article also cites two Environmental Working Group (EWG) reports, both of which have been exhaustively debunked by the International Bottled Water Association (IBWA). See: www.bottledwater.org/content/environmental-working-group-report-bottled-water-contains-sensationalized-science-and-exagge and <http://www.bottledwater.org/news/bottled-water-labels-scorecard-environmental-working-group-fda-epa-tap-water-spring-water-purified-water-food>

We note that "Cronkite News" is a college university news service, and we are disappointed that neither Ms. Miller nor her editor felt the need to reach out to IBWA or the FDA to check the accuracy of her information. Had she done so, she could have included the industry's point of view in her story.

EWG's Flawed Studies

- The 2008 EWG study has been discredited as biased and misleading. The results of the EWG study were based on the faulty premise that if any substance is present in a bottled water product—even if it doesn't exceed the established regulatory limit or no standard has been set—then it is a health concern. The report did not show any correlation between the levels of substances found in the bottled water brands tested and any potential adverse health effects. Moreover, the EWG report provides results from a market basket testing program that the EWG conducted on 10 brands of bottled water in nine states and the District of Columbia. That is certainly not a representative sample of bottled water products—which the EWG report acknowledged. The testing results showed only two bottled water brands didn't meet a California state standard for one regulated substance. There are many hundreds of brands sold in the United States that were not involved in this study. In addition, while bottled water products should always comply with all established regulatory standards, the California requirement for this substance is eight times lower than the FDA standard of quality for bottled water and the EPA maximum contaminant level for tap water. In the report, the EWG frequently mischaracterizes substances found in the tested bottled water products and discusses them out of context with accepted scientific determinations. The report is based on the faulty premise that if any substance is present in a bottled water product, even if it does not exceed the established regulatory limit or no standard has been set, then it's a health concern. For example, the EWG was critical of the bottled water brands found to contain fluoride. However, fluoride can prevent tooth decay and the American Dental Association has stated the following: "Whether you drink fluoridated water from the tap or buy it in a bottle, you're doing the right thing for your oral health." Moreover, the levels of fluoride found in the bottled water tested by the EWG were all in compliance with the applicable FDA standards.
- The 2010 EWG study makes false, misleading, unsubstantiated, and disparaging claims about the labeling and quality of bottled water. In particular, the report grades bottled water brands based on criteria that are subjective and irrelevant to any legal requirements. Thus, bottled water brands that are in full compliance with Federal and state labeling laws are nonetheless consistently given a low grade by EWG. We find such criteria to be completely arbitrary and irrelevant, and hence grossly misleading to consumers.

In the 2010 report, EWG claims that bottled water companies keep secret certain information about their products. In particular, EWG believes that bottled water companies should provide consumers with information on the source of the water, the treatment of the water, and the quality of the water. But this EWG statement is patently false. Bottled water companies are not hiding information or keeping it secret. In fact, IBWA supports a consumer's right to clear, accurate and comprehensive information about the bottled water products they purchase.

All packaged foods and beverage products, including bottled water, have extensive

labeling requirements, including a statement of the type of water that is in the container, compliance with the applicable definitions in the FDA Standards of Identity, ingredient labeling, name and place of business of the manufacturer, packer or distributor, net weight, and, if required, nutrition labeling. In addition, almost all bottled water products also have a phone number and/or website address on the label. This contact information allows consumers to get any additional information that they may want that might not already be on the label. This might include the source, treatment, and quality information.

Disclosures, such as those required by EPA in Consumer Confidence Reports (CCRs) for public water systems, are not required of any food or beverage product. These 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 information³ 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.

The 2000 FDA Feasibility Study Report (65 Fed. Reg. § 51836 (2000)) looked at various ways that bottled water information could be communicated to consumers, including company contact information on the label, placing specific contaminant and other information on the label, distributing pamphlets at the point of purchase and providing information via the internet. IBWA agrees with the FDA's conclusion that placing all of the information contained in the CCRs provided by public water systems on bottled water labels is not feasible. FDA concluded that:

"We agree with comments that stated it is not feasible to provide all of the information that is analogous to that contained in a CCR on a bottled water label. Such information would be excessive in limited label space, particularly on the small, single serving bottles. In addition, information that requires frequent changes due to changing test results may result in a misbranded product. Costs of frequent label changes that are necessary to ensure accurate information on the contents of a bottled water product, due to frequently changing information, may present an economic hardship to companies. Moreover, even annual updates that represent the contaminant history would need information to put the history for all such CCR-type information in context for the consumer and would be excessive in limited label space."

Bottled Water Safety

- As stated above, bottled water is strictly regulated by FDA. In addition, researchers have estimated 19.5 million cases of acute gastrointestinal illness are caused by tap water each year. Read more: www.ncbi.nlm.nih.gov/pubmed/18020305. In contrast, a survey of state bottled water regulatory authorities, conducted by the Government Accountability Office (GAO), found there were zero outbreaks of foodborne illness from bottled water over a five year period. For more information, visit thefactsaboutwater.org/wp-content/uploads/2017/06/CSA-FINAL-060117.pdf

You've probably heard by now that in 2016 bottled water outsold carbonated soft drinks (by volume) to become the No.1 packaged beverage in the United States. Americans are making great efforts to live a better lifestyle by choosing healthier foods and beverages, and drinking water – tap, bottled, or filtered – should be encouraged. With the high rates of obesity, diabetes, heart disease, and lead-contaminated tap water in our on-the-go society, bottled water provides a safe, healthy, convenient beverage choice. Discouraging people from choosing this healthy drink option is not in the public interest.

We do appreciate your interest in America's No.1 packaged beverage, but we also kindly ask that you update your article to more accurately reflect the facts about bottled water.

Sincerely,

Jill Culora
Vice President of Communications
International Bottled Water Association