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Letter to the Editor

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Re: Tribune news story: *How safe is bottled water?* By Danielle Braff
<http://www.chicagotribune.com/lifestyles/health/sc-bottled-water-health-0127-20160127-story.html>, published in numerous Tribune newspapers and online.

Dear Editor,

Bottled water is certainly a hot topic – especially in light of the intense focus on Flint, Michigan’s, lead-contaminated public water supply, so I do understand Tribune’s interest and motivation in publishing a piece about bottled water safety. What I don’t understand is why Tribune chose to publish an article that scares readers with claims that cite a 17-year-old Natural Resources Defense Council (NRDC) study, while not reaching out to the bottled water industry to weigh in on the many questionable statements attributed to that old study.

The flawed NRDC study cited in your article has been extensively rebutted and shown to be disingenuous and inaccurate. In fact, the NRDC acknowledged the study’s information was out of date and [posted an update](#) to its website in July 2013, stating: “We are pleased to report

recent regulatory action based on NRDC's advocacy. Since the publication date, the FDA has agreed to more stringently regulate bottled water safety to NRDC's standards".

You also reference a 2008 Environmental Working Group (EWG) study that 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 EWG 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 — a fact which the EWG report acknowledged.

Below, I have included some useful material that will provide your readers with accurate and factual information about bottled water.

- Bottled water 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. 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, including lead, bottled water regulations are substantially more stringent.
- Stringent water quality testing and reporting within bottled water plants means if any quality problems are detected, the product can either be held from shipping or recalled using lot numbers printed on individual bottles. For this reason, bottled water is rarely recalled. In fact, FDA records show there has been just one recall per year averaged over the past 10 years.

Your article also referenced a 2015 voluntary product recall by one bottled water company in Pennsylvania. Laboratory tests confirmed there was no contamination of any kind detected in the finished bottled water products or in the spring water that was delivered to the bottling facility. Even so, out of an abundance of caution, the facility immediately shut down operations, disinfected bottling lines, and initiated a voluntary recall. You can read the company [press statement](#) on this issue.

- As noted above, the NRDC study is old and outdated, and has also been revised to correct information no longer accurate. Throughout all of their analysis, NRDC found not one instance of contamination that would raise a legitimate health concern. Indeed, the survey could find only four results where federal health standards were exceeded. Closer inspection reveals that the two results charged by the NRDC Report to exceed total coliform standards, 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 so narrow, and with such limited application, as to be irrelevant to public health. In fact, the levels found in the bottled water are below the EPA health-based fluoride standard for public water systems.

- The fact is, bottled water is among the most highly regulated food products by the FDA under the Federal Food, Drug and Cosmetic Act (“FFDCA,” 21 U.S.C. s. 301 et seq.).
- And the fact also is, people can be assured that bottled water is a safe, reliable, and consistent source of drinking water. The Centers for Disease Control and Prevention (CDC) estimate that tap water is responsible for 19.5 million illnesses each year. While bottled water is blamed for none.
- Regarding the quality and safety of tap water, as noted in the 2013 Drinking Water Research Foundation (DWRf) report, [‘Microbial Health Risks of Regulated Drinking Waters in the United States,’](#) researchers estimate that more than 500 boil alerts occurred in the United States in 2010. In addition, the CDC reports that waterborne diseases, such as Cryptosporidiosis and Giardiasis, cost the U.S. healthcare system as much as \$539 million a year in hospital expenses.
- 86 percent of consumers polled say they drink bottled water, a 2015 Harris Poll found.
- Bottled Water sales (wholesale) reached \$13 billion in 2014 and the Beverage Marketing Corporation expects bottled water to outsell soda by 2020. And, 73 percent of the growth in sales is attributed to people shifting from soda to the other convenience drink – Bottled water.
- 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. However, purified bottled water 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 FDA’s 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.
- The 2011 DWRf report [‘Bottled Water and Tap Water: Just the Facts,’](#) provides a detailed comparison of quality and monitoring regulations for tap water and bottled water.

As many Americans are making the decision to choose healthier foods and beverages, it is not in the best interest of your readers to discourage consumption of this safe, healthy, product.

Thank you for reading and for giving my concerns your attention. I respectfully request that correct your online story because as it is misleading consumers. I am happy to speak with you directly should you wish to discuss any of these points or to answer other questions you may have.

You can learn more about bottled water by visiting www.bottledwater.org.

Sincerely,

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