International Bottled Water Association

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February 6, 2024

Newell Nussbaumer, Publisher
Buffalo Rising
671 Main Street
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Dear Mr. Nussbaumer:

I am writing on behalf of the International Bottled Water Association (IBWA) regarding your article *"Bottled Water's Contribution to Climate Change"* (https://www.buffalorising.com/2024/01/bottled-waters-contribution-to-climate-change/). This piece contains several false and misleading claims about the environmental impact, regulation and saftey of bottled water. We request that you update your story to include the following important bottled water facts so that your readers are not misled about this safe, healthy, and convenient consumer product. The consumption of water—whether from the bottle, tap, or filter—is a good thing, and any actions that discourage people from drinking bottled water are not in the public interest.

- Consumers can easily see a bottled water's source because it is printed on the label of each container. Bottled water, like all packaged foods and beverage products, have extensive labeling requirements set out by the U.S. Food and Drug Administration (FDA), which include a statement of the type of water (spring, purified, mineral, etc.) that is in the container.

- Contrary to statements in your article, bottled water production uses an extremely small amount of water — just 0.01% of all water used in the U.S. See this graphic. In addition, bottled water has the lowest water use and energy use ratios of any packaged beverage. The results of a 2018 IBWA Water and Energy Use 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 1 liter of water consumed)* and 0.21 mega joules of energy are used to produce 1 liter of finished bottled water.

- When it comes to greenhouse gases, bottled water is again a very small producer compared to other beverages. McKinsey & Company, a well-respected consulting firm, issued a report that "PET bottles have the lowest greenhouse gas (GHG) emissions because of their lightweight properties and the low amount of energy required to produce them. By contrast, aluminum cans have two times the emissions of PET bottles,

and emissions from glass bottles are three times higher." It is important to note that this report compares PET soda bottles, rather than PET water bottles, with other packaging types. If McKinsey & Associates had included PET water bottles (which use 167% less plastic than soda bottles) in this report, it is highly likely that the report would have found an even greater disparity between GHG emissions when compared with aluminum cans and glass bottles.

- A recent litter study revealed that bottled water drinkers litter less than those who consume most other beverages. The Keep America Beautiful 2020 National Litter Study **(** https://kab.org/litter/litter-study/)sorted and counted litter by container type. The "litter rate" for the following drinks (per 1,000 drinks sold) is:

    - Liquor and Wine – 47.6
    - Beer – 17.2
    - Sports and Energy Drinks – 9.2
    - Soda – 5
    - Juice – 3.6
    - Bottled Water – 3.4
    - Tea and Coffee – 1.7

  The fact that bottled water drinkers littering less than most other beverages makes sense. They drink water instead of other less healthy drinks because they care about their health, and they hang on to their containers to recycle, either at home or on the go, because they care about the environment.

- Bottled water containers are among the easiest packaging types to recycle and make up 52% of all PET plastic beverage containers collected in curbside programs in the United States. Overall, all PET plastic bottles and jars have a recycling rate of 29.1%, according to the U.S Environmental Protection Agency (EPA). On that same EPA webpage, the agency reports the recycling rate for ALL plastic (PET, HDPE, PP, etc.) is 8.7%.

- All bottled water containers, whether packaged in PET, HDPE, or PC plastic, are 100% recyclable, unlike most reusable water containers that are made from either plastics that are difficult to recycle or materials that are not recyclable because they contain a mixture of metal and composite substances.

- Bottled water companies do not drain aquifers and/or surface waters or use more water than can be replenished. The water sources used by bottled water companies must be renewable to justify the large financial investment that bottled water manufacturers make to bring their products to market. As such, bottled water companies are continuously developing innovative and efficient ways to use and conserve this critical resource. These measures include:
    - using hydro-geological evaluations on springs to assess any potential impact on local groundwater levels and stream flows
    - managing water withdrawals in a manner that ensures the long-term viability of water sources

- reducing water extraction through improved water processing and bottling processes
- auditing total water use at bottled water facilities
- implementing water use restrictions at those facilities to comply with water rationing during drought or low regional water supply conditions
- looking for leaks in all plant piping and tanks
- using efficient cleaning methods inside plants to reduce water usage when cleaning reusable 3- and 5-gallon bottles for water coolers used in homes and offices
- reducing water use when cleaning and sterilizing water pipes and storage tanks
- planting drought-resistant vegetation at bottling facilities
- training employees to be good stewards of the environment and encouraging water conservation.

- The bottled water industry competes with other packaged drinks, not tap water. In fact, the bottled water industry supports strong public water systems. However, the water from public water systems is often compromised after emergency situations or natural disasters (e.g., hurricanes, floods, tornados, fires, or boil alerts). In addition, there has been a recent increase in instances of tap water being contaminated with lead and/or perfluoroalkyl and polyfluoroalkyl substances (PFAS). During all these times, bottled water is a necessary and reliable option to deliver clean, safe drinking water.

- Your article claims bottled water is less safe than tap water, however, by federal law, the FDA regulations governing the safety and quality of bottled water must be as protective of public health as the Environmental Protection Agency (EPA) standards for tap water. And, in some cases, such as lead, the bottled water regulations are more stringent.

  On a gallon-per-gallon basis, bottled water is required to be tested 26 times more often than tap water. FDA has established bottled water Standards of Quality (SOQs) for more than 90 substances (21 C.F.R. § 165.110 (b)). The vast majority of FDA bottled water quality standards are the same as EPA's maximum contaminant levels (MCL) for tap water systems. The few differences are usually the results of the substance (usually tap water disinfectant byproducts) not being found in bottled water or the substance is regulated under another provision of law, such as FDA's food additives program.

- In addition, bottled water must comply with the general FDA good manufacturing practices (GMPs) for foods (21 CFR Part 117), specific bottled water GMPs (21 CFR Part 129), and bottled water standards of identity (21 CFR 165.110 (a)). All bottled water products—whether sourced from groundwater or public water systems—are produced utilizing a multi-barrier approach, which includes one or more of the following: source protection, reverse osmosis, distillation, micro-filtration, carbon filtration, ozonation, or ultraviolet (UV) light. The finished water product is then placed in a sealed bottle under sanitary conditions and sold to the consumer.

Purified bottled water that is made by using water from a public water system 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 purified standard of the U.S. Pharmacopeia 23rd Revision. These treatments can include reverse osmosis, distillation, or de-ionization. The finished water product, which is far different from the water that comes out of your tap, is then placed in a bottle under sanitary conditions and sold to consumers. To suggest that there is little difference in the quality and safety in tap and bottled water is simply not true.

- Bottled water containers (PET, HDPE, and PC) do not contain ingredients capable of producing dangerous substances under conditions of normal use, including being subjected to heat. PET plastic has been approved as safe for food and beverage contact by the FDA and similar regulatory agencies throughout the world for more than 35 years. PET plastic is the packaging material of choice for many other beverages—including soft drinks, juices, beer, wine, and spirits—and other food products—including peanut butter, salad dressings, condiment containers, vitamins, and vegetable oil—because of its transparency, stability, high-pressure resistance, barrier properties, flexibility, and light weight. PET's versatility is but one reason why thousands of other food products, in addition to bottled water, are packaged in PET plastic.

- PET plastic bottled water containers are just one of thousands of food containers packaged in plastic. There currently is both a lack of standardized methods and no scientific consensus on the potential health impacts of nano- and microplastic particles. Therefore, media reports about these particles in drinking water do nothing more than unnecessarily scare consumers.

  After reviewing the available studies concerning water, food, and beverages, the World Health Organization (WHO) concluded that no adverse health effects could be drawn from dietary exposure to nano- and microplastic particles less than 10 microns due to minimal scientific research. WHO's recommendation is for more research to be conducted, as well as establishing standardized methods for measuring and quantifying nano and microplastics. (Source: "Dietary and inhalation exposure to nano- and microplastic particles and potential implications for human health." Geneva: World Health Organization; 2022. (*https://apps.who.int/iris/bitstream/handle/10665/362049/9789240054608-eng.pdf*)

The FDA regulatory requirements for producing bottled water are comprehensive and stringent. Thus, it's imperative that media organizations such as Buffalo Rising present clear, accurate, and factual information to readers.

We are also concerned that misleading consumers about the environmental impact of bottled water could deter consumers from drinking the healthiest packaged beverage on the shelf: bottled water. In 2023, bottled water outsold carbonated soft drinks (by volume) again, retaining its title as America's favorite packaged beverage for the eighth year in a row.

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, and heart disease in our on-the-go society, bottled water provides a safe, healthy, and, as is noted in your story, convenient beverage choice. Discouraging people from choosing this healthy drink option is not in the public interest.

We request that you update your online story to reflect the facts we've provided so that your readers are not misinformed about bottled water's health and environmental impacts.

Sincerely,

Jill Culora
Vice President Communications
International Bottled Water Association

Sent to: newell@buffalorising.com