

International Bottled Water Association

Statement Regarding Netflix Television Series “Rotten: Troubled Water”

The anti-bottled water bias and false claims presented in the Netflix series “Rotten: Troubled Water” is a disservice to viewers and the general public. This show is misinformed about the facts behind the growth of bottled water sales, as well as product quality, safety, and regulation.

The International Bottled Water Association (IBWA) worked with the show’s producers by providing information and answering specific industry questions. Based on our review of previously aired episodes, IBWA had concerns that, despite portraying itself as a balanced documentary, the series is biased, anti-corporate, and would, therefore, omit facts that did not support the producer’s anti-bottled water storyline. For this reason, IBWA declined to appear on camera and instead worked with producers through written correspondence, none of which was used in this episode.

The producers clearly did not want the facts to contradict their storyline, which falsely claims that the bottled water industry, and Nestlé Waters North America in particular, is at war with tap water, which is not the case. Provided below are the facts.

Bottled Water and Tap Water

It is very important for people to drink water. IBWA and its members promote and encourage the consumption of all water — tap, filtered and bottled. This is particularly important as our nation faces increasingly high rates of obesity, diabetes and heart disease. Actions that discourage people from drinking bottled water are not in the public interest.

Contrary to what is depicted in this series, bottled water does not compete with tap water. Most people drink both tap or filtered and bottled water (74%), according results of a [2018 Harris Poll](#). People decide what type of water is best for them based on taste, convenience, and quality. Bottled water is a healthy packaged beverage product, and the bottled water industry doesn’t view tap water as its 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. Rotten producers were provided this information, which is also depicted in this [consumption shift chart](#). The producers chose not to use this information (i.e., the facts) because it contradicted their position that tap water’s negative image is driving bottled water sales.

The bottled water industry supports a strong public water system, which is important for providing citizens with clean and safe drinking water. The ongoing debate on this issue is a result of decades of insufficient infrastructure spending.

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 U.S. Food and Drug Administration's (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, 23rd 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.

Consumers Choosing Healthy

Results from IBWA's 2018 Consumer Harris Poll show taste (97%), price (88%), ready to enjoy (can be consumed at room temperature as opposed to soda) (77%), convenient on the go packaging (76%), no artificial sweeteners (65%) and no calories (64%) are significant reasons people are choosing bottled water. As mentioned above, 69 percent of the growth in bottled water consumption since 2006 has come from people shifting away from carbonated soft drinks and fruit drinks. When you review the number of calories saved from people choosing zero-calorie bottled water instead of caloric drinks, the figure is staggering—trillion and trillions of calories have been removed from the U.S. diet as a result of this [consumption shift](#).

Notably - in this series, the people who participated in a Philadelphia Water Commission focus group told the moderator that they drink bottled water because of taste, quality and convenience.

"Spring Water" – Definition and Federal Rules

This series makes numerous claims about "spring water," which are simply not true. Bottled water, as a packaged food product, is stringently and comprehensively regulated by FDA, which has precise definitions [Standards of Identity (SOI)] for all types of bottled water: Spring Water, Purified Water, Artesian Water, Mineral Water, Sparkling Water and Well Water. The SOIs set forth by FDA are designed to protect the public's health.

As set forth in the FDA bottled water regulations, spring water is water derived from an underground formation from which water flows naturally to the surface of the earth. Spring water must be collected only at the spring or through a borehole tapping the underground formation feeding the spring. Spring water collected with the use of an external force must be from the same underground stratum as the spring, must have all the physical properties before treatment, and must be of the same composition and quality as the water that flows naturally to the surface of the earth.

If a bottled water source doesn't meet this exacting FDA standard, it cannot be called a spring water. In addition, a product that falsely claims to be a spring water will cause it to be misbranded and subject to seizure and/or recall. Moreover, the manufacturer of the misbranded product will be subject to both civil and criminal penalties.

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 - even when the water withdrawals occur on privately owned land (for industrial, commercial and agricultural purposes). Building a bottled water plant is a costly endeavor - many millions of dollars. It just wouldn't make business sense to build a plant and then deplete the source of their water.

Using Municipal Water as a Source for Bottled Water

Bottlers that use a municipal water source are 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.

Well-Paying Jobs and Tax Revenue

Companies that manufacture, distribute, and sell bottled water products employ more than 220,993 Americans in cities and towns throughout the United States and generate an additional 432,278 jobs in supplier and ancillary industries. Not only does the manufacture and sale of bottled water supplies create good jobs in the United States, it also contributes to the economy as a whole. In fact, the bottled water industry is responsible for as much as \$152.57 billion in economic activity. In addition, companies that produce, distribute and sell bottled water; their employees; and other firms and employees that depend on bottled water for their livelihoods provide the Federal government with over \$9.25 billion in tax revenues. State and local governments benefit from over \$6.31 billion in business and personal taxes paid by these firms and their employees.

Bottled Water Is a Very Small Water and Energy User

Contrary to the claims made in the program, bottled water uses a very small amount of water in the US. Bottled water uses just 0.011% of all water used in the United States and 0.02% of all groundwater used, far less than many other industries (e.g., agriculture, livestock) and businesses. In addition, bottled water also has the lowest water- and energy-use ratios of all packaged beverages. On average, it takes only 1.39 liters of water to produce 1 liter of finished bottled water (including the 1 liter of water consumed), which is the lowest water-use ratio of any packaged beverage product. And on average, only 0.21 mega joules of energy are used to produce 1 liter of bottle of water.

The Environmental Impact of Bottled Water

Bottled water has the smallest environmental footprint of all packaged beverages. All bottled water containers are 100 percent recyclable, and, as an industry, we support strong community recycling initiatives and recognize that a continued focus on increased recycling is important for everyone. In addition, of all PET containers recycled through curbside collection systems, bottled water containers make up approximately 55 percent. 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.

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 during that period.

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 recycled PET (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.

Bottled Water and Emergencies

When the safety and quality of public drinking water are 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 there when it is needed. However, the efforts of the bottled water industry to provide crucial drinking water to citizens afflicted by natural disasters and other emergency situations 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 statements about the safety of bottled water does a disservice to consumers who rely on bottled water to provide much-needed safe drinking water in the aftermath of hurricanes, floods, wildfires, and tap water boil alerts or contamination.

Bottled Water Safety

Bottled water is among the safest food products on the market. All bottled water products—whether from groundwater or public water sources—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 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.

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, 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.

Safety of PET Plastic Bottles

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, single-serve bottled water products are packaged in PET plastic containers, which 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 the containers for many other beverages, including soft drinks, juices, beer, wine, and spirits.

Access to Safe Drinking Water in Developing Countries

In many parts of the world, clean safe water is unavailable or only available in limited quantities, even in stable periods without an over-arching natural disaster. While governments and the private sector work to find permanent solutions to provide clean drinking water in underserved communities around the world, bottled water, combined with other solutions such as filtration and bulk filling stations, is an efficient and effective means of delivering clean, sanitary drinking water where insufficient or non-existent water delivery infrastructure poses life-threatening problems. In addition, a growing number of bottled water companies are designating a portion of their income to support global programs, which help create long-term solutions for the provision of water for drinking, sanitation and hygiene in underserved and developing communities.

As always, the bottled water industry is committed to providing consumers with safe and high quality products. For more information about bottled water, visit IBWA's website: 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.

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