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Dear Editors:

I am writing on behalf of the International Bottled Water Association (IBWA) regarding the terribly misleading and error-ridden article, "All the convincing you'll need to ditch bottled water for good," by guest writer Daryl Austin, that you published online on September 16, 2022. This piece contains many false claims about bottled water, and its content seems to be presented in an intentionally deceptive manner. As a result, HuffPost is misleading its readers about this safe, healthy, and convenient consumer product.

We request that you update your article to include the following important bottled water facts:

- All bottled water containers are made from food-grade materials that meet the
 U.S. Food and Drug Administration's (FDA) guidelines for safe, direct contact
 with water. Although your article attempts to steer consumers away from
 bottled water consumption due to phthalates, research you referenced
 (published in <u>Food Research International</u>) reports directly on the safety of
 bottled water containers: "bottled water does not represent a relevant ingestion
 source of phthalates," and "PET-bottled water was found safe for consumption."
- PET plastic containers 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 material of choice for many other beverages—including soft drinks, juices, beer, wine, and spirits—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.

The article incorrectly infers that the Centers for Disease Control and Prevention (CDC) recommends that immune-compromised people should not drink bottled water. However, the opposite is true. In the link you provided, the CDC states that people living with compromised immune systems should "take special precautions with the water they drink" [not the bottled water they drink]. The CDC text goes on to explain that "the parasite *Cryptosporidium* can cause chronic or severe illness and even life-threatening symptoms." That's why the CDC recommends that people who are living with compromised immune systems drink bottled water that is produced using reverse osmosis, distillation, and/or filtration with an absolute 1 micron filter—because those bottled water treatments "protect against *Cryptosporidium*." It appears your writer has misinterpreted the source information.

While on the topic of drinking water and illness, I should note that two studies ("Risk of waterborne illness via drinking water in the United States" and "An approach for developing a national estimate of waterborne disease due to drinking water and a national estimate model application") report, respectively, that "drinking water" (i.e., tap water) has caused 19.5 million and 16 million cases of gastrointestinal illnesses per year among the U.S. population.

• The HuffPost article also makes the following false statement about bottled water's recycling rate: "It [bottled water] also causes tremendous pollution as an estimated amount of only 8.7% of water bottles end up being recycled." As noted in the link your article provides, "8.7 percent" is the recycling rate for all plastics. If your author or factcheckers would have browsed one line lower in that EPA report, they would have seen that "the recycling rate of PET bottles and jars was 29.1 percent in 2018." However, we probably all agree that recycling rates for all plastics need to improve.

A benefit of bottled water is that its containers are 100 percent recyclable—even the caps, and PET bottled water containers are the most recognized and most recycled containers in curbside programs, making up nearly 52 percent of all PET plastic beverage containers collected. As an industry, IBWA supports strong community recycling initiatives and recognizes that a continued focus on increased recycling is important for everyone.

- Regarding microplastics, it is important to note that there is currently no scientific consensus on the potential health impacts of microplastic particles, which are found in all aspects of our environment – soil, air, and water. Latest research on the major origins of microplastic particles shows these are not from bottled water production, but from wastewater from washing machines. Read more here.
- In the absence of any federal regulation or recommended limits for PFAS (perand polyfluoroalkyl substances) in bottled water, IBWA set self-imposed, mandatory testing requirements and standards of quality (SOQ) for our member

company bottled water products. IBWA's PFAS SOQs of 5 parts per trillion (ppt) for one PFAS and 10 ppt for more than one PFAS are more stringent than any state PFAS regulation. By testing for PFAS, IBWA bottler members provide their consumers, local and state governments, and disaster and emergency relief personnel further assurance that bottled water is a safe and convenient product for everyday use and in times of need – such as when tap water is compromised.

This industry-led action underscores the commitment of IBWA members to always provide consumers with the safest and highest quality bottled water products. In addition, IBWA has asked FDA to issue a national SOQ for PFAS that would preempt any state standards. That effort would prevent bottled water companies from being subject to a patchwork of differing state laws on this issue.

• Arsenic is a naturally occurring substance that is widely found in soil, water, and almost all plant and animal life, including the human body. Arsenic can be present at varying levels in many foods and beverages, and these products, like bottled water, are safe to consume and enjoy. The FDA SOQ for arsenic in bottled water is 10 parts per billion (ppb), which means that FDA concluded that based on the best available science the current limit protects the public health. And FDA sets limits that are lower than the level at which harm would likely occur, which the bottled water industry fully supports. The U.S. Environmental Protection Agency (EPA), which regulates tap water, has also established a 10 ppb standard for arsenic.

Recently, FDA released its <u>Total Diet Study (TDS)</u> Report for Fiscal Years 2018-2020. The TDS is a continuous survey and one of the tools FDA uses to monitor the food supply. In FY 2018, FDA implemented a modernized TDS research design that included streamlined analytical methods, a population-based sampling plan, and an updated food list. Among other food items (e.g., alcohol, baby food, baked goods, beverages, dairy, fruit, grains, meats, restaurant foods, seafood, vegetables, etc.), the study sampled both bottled water and bottled water intended for infants. All results for bottled water fell safely below the FDA's SOQs, including those for arsenic—but also for lead, cadmium, and mercury. Bottled water intended for infants had no detectable levels of arsenic lead, cadmium, or mercury.

• Contrary to what is published in your article, not only is bottled water the healthiest packaged drink but also it has the smallest environmental footprint of all packaged drinks. Here's why: PET water bottles use less than half of the material weight of all other packaging types—including aluminum cans, paperboard cartons, glass, and even PET soda bottles. Lower material usage means less impact from material extraction, manufacturing, and ultimately results in less material entering landfills or needing to be recycled. In addition, products such as carbonated soft drinks, juices, and other sugary beverages require far more plastic packaging due to carbonation and manufacturing processes (using at least 142 percent more plastic) and have a greater

environmental impact than bottled water. A <u>graphic</u> IBWA produced explains the life-cycle specifics quite well.

Additionally, research from the <u>American Chemistry Council</u> looked at the entire life cycle of plastic packaging versus the alternatives of aluminum cans, paperboard cartons, and glass—and concluded that PET plastic containers have the least environmental impact compared to those other packaging materials. The report's most significant finding was the nearly doubling of greenhouse gas emissions—a major contributor to global warming—that would occur using non-plastic containers (i.e., aluminum cans, cartons, and glass). In fact, the use of those alternative packaging materials produces about 60 percent *more* greenhouse gas emissions than plastic beverage containers.

Bottled water is America's favorite packaged drink. In fact, <u>sales data from Beverage</u> <u>Marketing Corporation</u> (BMC) shows that since 2010, approximately 44 percent of the growth in U.S. bottled water consumption has come from people switching from carbonated soft drinks and juices to bottled water. BMC statistics predict that trend to continue for the foreseeable future. So, we're sure this won't be the last time that the HuffPost covers bottled water. That's why we invite you to contact us when you are working on your next bottled water article. We'll be happy to factcheck and provide you the industry's perspective.

As your article notes, people aren't drinking enough water. And <u>Harris Poll research</u> has shown that attempts to deter people from enjoying bottled water will lead them to consume less healthy beverages that contain unwanted sugar, caffeine, or other additives. However, with the high rates of obesity, diabetes, and heart disease in the United States, we are sure you'll agree that discouraging people from choosing bottled water, the healthiest 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