International Bottled Water Association

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The Honorable John Shimkus
Chairman, Subcommittee on Environment and the Economy
House Energy and Commerce Committee
2151 Rayburn House Office Building
Washington, DC 20515

The Honorable Paul Tonko
Ranking Member, Subcommittee on Environment and the Economy
House Energy and Commerce Committee
2322A Rayburn House Office Building
Washington, DC 20515

Dear Chairman Shimkus and Ranking Member Tonko,

On behalf of the members of the International Bottled Water Association (IBWA), headquartered in Alexandria, Virginia, thank you for the opportunity to provide this statement for the subcommittee's hearing on cyanotoxins in drinking water.

Founded in 1958, IBWA's membership includes U.S. and international bottlers, distributors, and suppliers who are committed to providing safe, high-quality bottled water products. IBWA members make all types of bottled water products, including spring, mineral, purified, artesian, and sparkling.

The bottled water industry supports a strong public water system, which is important for providing all citizens with clean, safe drinking water. However, during challenging times, such as a natural disaster, emergency, or other events that cause tap water to be unsafe or unavailable, the bottled water industry is committed to ensuring that safe, quality bottled water is made available to emergency support organizations, city and state governments, relief centers, retailers, and other points of distribution. This was evident most recently when IBWA members provided the citizens of Toledo, Ohio with safe, clean, bottled water when the public water system was contaminated by a cyanotoxin from an algae bloom in Lake Erie.

When the Toledo public water system was contaminated by this cyanotoxin, IBWA members immediately stepped forward to re-route delivery trucks and coordinate with local suppliers to provide Toledo citizens with safe, clean bottled water. We also reached out to Ohio Governor John Kasich and Toledo Mayor Michael Collins to commend them for their rapid and well-coordinated response to the crisis and offered our assistance should the community face additional challenges. Please see the communications that were sent by IBWA on August 6, 2014, which are included with this testimony.

Smart planning and preparing for one's water needs can make a big difference in the ability to get through and recover from an emergency situation or natural disaster. When preparing for a natural disaster or other emergency, the Federal Emergency Management Agency (FEMA) specifically recommends that store-bought bottled water be part of everyone's supplies; at least one gallon per-person, per-day for three days. Storing bottled water is a safe and convenient way to ensure that you have an adequate supply of water on hand.

Throughout the years, bottled water companies have responded to the need for clean water in such incidents as the 2013 chemical spill in Charleston, West Virginia; Hurricanes Sandy and Katrina; and numerous floods, wild fires, and earthquakes. These events serve as stark reminders for people to re-assess their risks and update their emergency plans. While catastrophic situations are thankfully rare, boil alerts and other types of public water system disruptions are frequent occurrences across the country. In addition, continued volatility in the weather across the nation only reinforces the importance of always being prepared for unexpected natural disasters and dangerous weather.

As stated earlier in this letter, the bottled water industry supports a strong public water system because it provides citizens with clean and safe drinking water. IBWA appreciates the Congress's passage earlier this year of the Water Infrastructure Finance and Innovation Authority, which supports the maintenance and improvement of America's water infrastructure. This is accomplished through mechanisms such as the state revolving fund and providing access to low cost or no cost capital for water infrastructure improvements.

Many bottled water companies use public water sources for their products. Once that water enters the bottled water plant several processes are employed to ensure that it meets the U.S. Food and Drug Administration's (FDA) 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.

Purified bottled waters that are sourced from public water systems are not subject to cyanotoxins due to the treatments that are used to produce these products. For example, granular activated carbon filtration and reverse osmosis will both remove algal cyanotoxins. Natural bottled waters (e.g., spring water, artesian well water) come from groundwater sources and are therefore protected from surface water contamination that might contain cyanotoxins. Moreover, algae cannot survive in subterranean groundwater aquifers in the absence of light.

Bottled water is comprehensively regulated by the FDA as a packaged food product. FDA regulations establishing Standards of Identity, 21 CFR §165.110(a), and Standards of Quality, 21 CFR §165.110(b), for bottled water were supported by the industry. In 1996, the industry worked with Congress to mandate that FDA standards for bottled water be as protective of the public health as Environmental Protection Agency (EPA) tap water regulations (§410 of the Food, Drug, and Cosmetic Act). And, in some very important cases like lead, coliform bacteria, and *E. coli*, FDA bottled water regulations are more stringent than EPA tap water standards.

The bottled water industry is a strong supporter of our environment and our natural resources. For example, during the past several years, the industry has demonstrated this commitment by significantly reducing the average weight of plastic water bottle containers. According to Beverage Marketing Corporation, between 2000 and 2011, the average weight of a 16.9-ounce PET plastic bottle has declined 47.7% to 9.89 grams, saving 3.3 billion pounds of PET resin. In addition, all bottled water containers are 100% recyclable and many bottled water companies now use bottles made from 50, 75, and even 100 percent recycled PET (rPET) plastic. Data derived from EPA figures demonstrate that plastic water bottles make up less than one-third of one percent of the entire U.S. waste stream. And a 2014 study conducted by the Antea Group shows that bottled water has the lowest water use (1.32 liters per liter; including the liter that is consumed) and lowest energy use (0.24 megajoules per liter) of any packaged beverage.

The bottled water industry is always there to help during a time of natural disaster and emergency situations. Every year, IBWA members respond to many requests – both big and small – to provide bottled water to the victims of these events. We stand ready to assist whenever communities across America are in need.

We appreciate the opportunity to provide the Subcommittee with our views. If you would like more information or have further questions, please do not hesitate to contact us.

Sincerely,

Joseph K. Doss
President & CEO