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From: Mah, Raymond [rmah@puc.sf.ca.us]
Sent: Monday, April 24, 2000 1:59 PM
To: 'fdadockets@oc.fda.gov'
Cc: Quinones, David; Labonte, Julie; Boozarpour, Manouchehr; DeGraca, Andy
Subject: Comments to Dockets Management Branch (HFA-305) - Docket 97N-0436



bottled water
comments.doc

Dear Dockets Manager:

Attached is a Microsoft Word file with the comments by the San Francisco Public Utilities Commission on FDA's Draft Study Report: Feasibility of Appropriate Methods on Informing Customers on the Contents of Bottled Water (65 FR 8718).

A hardcopy is also being mailed. Should you have trouble opening the file, please let me know.

Regards,

Raymond Mah

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97N-0436

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CITY AND COUNTY OF SAN FRANCISCO
PUBLIC UTILITIES COMMISSION
WATER QUALITY BUREAU

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CLEAN WATER PROGRAM

April 24, 2000

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

PROPOSED BOTTLED WATER REGULATION COMMENTS

To Docket Manager:

The San Francisco Public Utilities Commission (SFPUC) provides water to residential, commercial, and industrial consumers in the San Francisco Bay area through direct retail deliveries to San Francisco customers and through wholesale deliveries to 29 suburban agencies. Approximately 60 percent of the delivered water is supplied to suburban agencies in the counties of Alameda, Santa Clara, and San Mateo, and 40 percent is used by City customers.

The SFPUC believes that consumers have a right to expect that all drinking water sources meet the same minimum standards and that water quality data be made readily available so that educated choices can be made.

After reviewing the proposed bottled water regulations, the SFPUC has the following comments:

- Bottled water regulations should meet drinking water standards imposed on public water systems.
- Bottled water labels shall include as a minimum: date when water was bottled, expiration date, source of water by county and nearest city, lot code, type of treatment (including ozonation, if any), and a toll-free information hotline. The hotline should answer questions and provide at a consumer's request a no-cost mailing with drinking water quality information similar to a Consumer Confidence Report (CCR).

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- Bottled water label shall state “refrigerate after opening.” Water quality is perishable and the bacteria count rises without refrigeration.
- A water bottler shall maintain a web site with water quality information similar to a CCR. If there are financial barriers to having a web site for a water bottler, FDA could provide all bottled water information on the FDA web site. This would provide information that is straightforward and can easily be obtained by a consumer. In addition, a database could be available to track historical data for each bottled water company including any violations. This database could be similar to EPA’s database that tracks public water system violations.
- The SFPUC urges the FDA to continue the requirement for listing sodium content as part of the nutrition label on bottled water.

Should you have any questions, contact me at 650-652-3102.

Sincerely,

Andrew DeGraca, PE
Water Quality Bureau Manager

Cc:

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