

South Central Connecticut Regional Water Authority  
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April 21, 2000

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

Gentlemen:

Docket No. 97N-0436, Food and Drug Administration Draft Study Report; *Feasibility of Appropriate Methods of Informing Customers of the Contents of Bottled Water*

The Regional Water Authority has reviewed the draft study report, published in the Federal Register on February 22, on the feasibility of appropriate methods of informing customers of the contents of bottled water, as required by the Safe Drinking Water Act Amendments. The South Central Connecticut Regional Water Authority, headquartered in New Haven, Connecticut, is a non-profit public corporation and political subdivision of the State providing public drinking water to nearly 400,000 consumers in 12 South Central Connecticut municipalities. The Authority owns and manages over 24,000 acres of land in the 16 member towns of the South Central Connecticut Regional Water District, a good deal of which protects watersheds and aquifers tributary to its sources of supply for public drinking water. As a public water supplier, we are required to provide our customers with an annual Consumer Confidence Report. Our 1998 CCR, mailed to our customers in July 1999, provided valuable information to our customers. Responses from our customers have been extremely favorable.

Additionally, we bottle our water as Whitney's Pure Water™ for sale in stores throughout the region and to non-profit organizations to use as fundraisers. Whitney's Pure Water™ is also provided free to some community and non-profit organizations under certain circumstances.

We believe people who consume bottled water should be able to obtain the same information about the water contained in the bottle as required by the Consumer Confidence Report Rule for those individuals who consume public water from a tap. However, as a bottler of water, we realize that space is limited on each bottle. Therefore, we recommend that label requirements include the source of the water, a phone number and Internet address for consumers to obtain additional information similar to the information contained in a Consumer Confidence Report.

We have reviewed and evaluated the six methods of informing customers of the contents of bottled water contained in the FDA Draft Study Report. Our ratings and comments for each method follow:

A. Information on the Label

Rating: Poor

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- 1) Smaller bottlers will incur significant costs by revamping their label. Typically smaller bottlers print labels in large quantities to reduce per piece costs. Hence they may have to scrap large inventories to meet the new requirements. Also, if they are required to update their label annually, they will have to order labels in smaller quantities which will increase their per label costs.
- 2) This will hurt the bottled water industry by frightening many customers with information they do not understand.
- 3) We believe it is overkill. Customers who do not want the information will be forced to receive it.

B. Information Available by Company Contact

Rating: Excellent

- 1) Phone and/or mail are inexpensive and ubiquitous solutions.
- 2) Since only those customers who want/need the information will submit a request via phone/mail/internet, it maximizes the use of limited resources.
- 3) Phone, mail and Internet all enable customers to receive clear answers from qualified experts who can explain what the technical data actually means.
- 4) Requiring a self-addressed stamped envelope for mail requests would reduce additional postage costs for smaller companies.

C. Combination Approach

Rating: Excellent, with revisions noted below

- 1) Information contained on the label should be limited to the source of the water, a phone number and an Internet address.
- 2) To include additional information on the label would be confusing to the customer and costly to the supplier.
- 3) See Method A and B for additional comments on each approach.

D. Information in a Pamphlet

Rating: Poor

- 1) Forces retailers to clutter their stores with multiple pamphlets for multiple bottled water brands.
- 2) Forces retailers to incur additional costs by maintaining pamphlet inventories.
- 3) Pamphlets will not always be in stock at store level.
- 4) Smaller bottlers will incur significant additional printing costs.

E. Distribution of an Information Package With Bulk Water Deliveries

Rating: Poor

- 1) This will not provide information to end users of bulk water. Only the vendor contact/purchasing manager will have access to the information. That person will not effectively distribute the information throughout the organization.

- 2) By simply providing a phone number, address or internet address on the bulk water bottle, each individual users can take responsibility for their specific information needs.

F. Information Available on the Internet

Rating: Excellent

- 1) Reports can be routinely updated quickly and efficiently, thus providing the consumer with up-to-date information.
- 2) Most bottled water providers already have established an Internet presence. Adding CCR information to their site is a very inexpensive option.
- 3) Consumers have specific questions about the information on the Internet, can submit their questions via e-mail for more detailed information.
- 4) Consumers have Internet access through public libraries and local school systems.

The Regional Water Authority is pleased to have been able to provide comments on the *Feasibility of Appropriate Methods of Informing Customers of the Contents of Bottled Water* report. We hope you find our comments helpful.

Yours truly,



Carlene E. Kulisch  
Government Relations Liaison

Regional **Water** Authority



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