



**NATURAL ARTESIAN WATER**

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FDA Dockets ~~Management~~ Branch  
HFA-305  
Food and Drug Administration  
5830 Fishers Lane, rm. 1061  
Rockville, MD 20852

April 18, 2000

**Regarding:** "the feasibility of appropriate methods informing customers of the content of bottled water" Federal Register / Vol. 65 No. 35 / Tuesday February 22, 2000 / Notices

To Whom It May Concern:

I am an owner of a small package bottled water business in the state of Oregon. My prior work history is in private and public water installation, servicing and distribution. I have had a California Grade III treatment certification and currently have an Oregon Grade I. I have been a member of the AWWA for several years.

In the private sector I have installed public and private small water systems where minimal funds were available and operators were not qualified. In the public sector I have been a water production supervisor for a medium sized city and a public works director for a small town.

I am encouraged that the FDA is moving in the right direction regarding the misrepresentation by some bottlers and the lack of information regarding bottled water quality. This leads to disparaging reports of "consumer rip-off".

I do not agree with the FDA's position that quality information should not be on the label. I believe that the point of purchase is the right place to put information regarding the contents of the package. This is the very basis for free market trade as distinct, accurate information is presented for a value judgement.

If water is purified a list of contaminants is not necessary. It is necessary that the consumer know if the source water has been chlorinated for possible THM's.

The other two divisions of water, filtered municipal and filtered or unfiltered Natural should bear the responsibility of informing the public that information is available regarding the quality, treatment, and source of water.

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*All water is not the same. Know the difference!*

Due to the lack of knowledge of some consumers I would suggest the FDA adopt a graphical symbol that should quickly inform consumers about source and treatment and upon further scrutiny request a more sophisticated and detailed lab analysis report by phone, fax or printed mail.

Since all public water supplies are mandated to meet the Primary and Secondary Quality standards established by EPA the information regarding non-published CCRs should be a priority of the FDA.

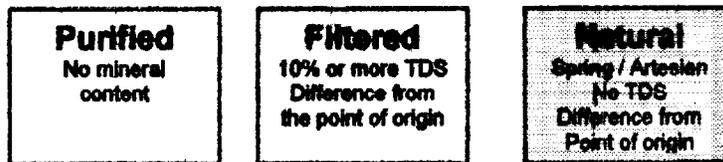
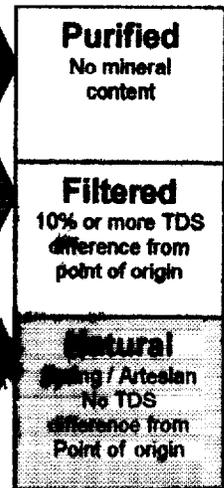
Also of great significance to the consumer is addition of chemicals to the source supply. It must be noted whether the source supply is chlorinated or non-chlorinated. The addition of chemicals should be noted on municipal and natural springs and artesian water supplies.

**SOURCE AND TREATMENT GRAPHICS ON THE PROMINENT DISPLAY PANEL.**

The consumer can understand these basic concepts through graphics:

1. Water source Chlorinated / Non Chlorinated
  - Municipal / Community
  - Natural
2. Treatment
  - Purified no minerals
  - Filtered (understandable/reasonable/conceptual)
  - Natural (Point of Diversion and type)
3. Percent change from point of source

**Source:** Chlorinated City of Portland municipal water 1-800-122-3456 analysis  
**Source:** Non chlorinated Pollywog Spring water 1234 Water Rd. Wet OR 1-800-122-3456 analysis  
**Source:** Non chlorinated Artesian water 1234 Water Rd. Wet OR. 1-800-122-3456 analysis



**Source:** Chlorinated City of Portland municipal water 1-800-122-3456 analysis  
**Source:** Non chlorinated Pollywog Spring water 1234 Water Rd. Wet OR 1-800-122-3456 analysis  
**Source:** Non chlorinated Artesian water 1234 Water Rd. Wet OR. 1-800-122-3456 analysis

By contrasting the product identifications through language or color codes the consumer will have an opportunity to establish the most basic of information SOURCE AND TREATMENT and then pursue the next level which is a little more complicated.

If you have any questions please call Frank Wright, 541-9956996

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