

Bottled Water

Concern about water quality, taste and social customs have spiked the public's interest in drinking water.

According to the Beverage Marketing Corporation, over the course of the 1990s, bottled water average intake more than doubled. Per capita bottled water consumption increased every year for the past 25 years. While in 2000 the per capita consumption was 18.3 gallons, the Beverage Marketing Corporation projects that by 2005, consumers will drink more bottled water (approximately 25 gallons per person) than any other beverage, alcoholic or non-alcoholic, with the exception of carbonated soft drinks.

Available studies indicate most bottled water contains fluoride at a level below 0.3 parts per million.^{1,2,3,4} However, among the large variety of bottled waters available, only a few provide information to the consumer on the label regarding fluoride content.

There is not a large body of research regarding the use of bottled water and caries risk. However, lack of exposure to fluoride does increase an individual's risk for caries. Individuals who drink bottled water as their primary source of water could be losing the decay preventive effects of optimally fluoridated water available from their community water supply. Therefore, consumers should seek advice from their dentist about specific fluoride needs.

The U.S. Food and Drug Administration (FDA) has established standards of quality for bottled drinking water (21 CFR 165). Adopted in 1996, current FDA regulations require fluoride content of bottled water to be listed on the label *only if fluoride is added during processing*.⁵

A bottled water study regarding the feasibility of appropriate methods of informing customers of fluoride content of bottled water was announced by the FDA in the Federal Register on November 12, 1997.⁶ In December 1997, the ADA submitted its official comments to the FDA stating that consumers should be informed, via the label, whether or not the bottled water contains fluoride, and if so, how much.

In the United States, the Environmental Protection Agency (EPA) and the Food and Drug Administration share responsibility for water quality. Beginning in 1999, the EPA enforced the right-to-know provisions of the Safe Drinking Water Act and required community water suppliers to provide their customers with annual drinking water quality reports. These Consumer Confidence Reports (CCR) are designed to enable users to make practical decisions about their health and their environment. For example, the "Consumer Confidence Report" must list the level of any contaminant, such as lead, arsenic or nitrate, found in local drinking water, as well as EPA's health-based standard (maximum contaminant level) for comparison. Regulated by the FDA, bottled water is exempt from this requirement, even though some of it is simply bottled municipal water.

Noting that bottled water is exempt from the right-to-know provisions of the Safe Drinking Water Act (SDWA), the American Medical Association (AMA), at its 1998 Interim Meeting of the House of Delegates, passed Resolution 427 as a statement of its support for analysis and appropriate labeling of bottled water. In addition, the AMA expressed its desire to work with the ADA to promote the availability of fluoridated bottled water.

On February 27, 2000, the FDA published its Draft Study Report, "Feasibility of Appropriate Methods of Informing Customers of the Contents of Bottled Water" and called for public comments on the draft. On April 24, 2000, the ADA forwarded its official comments on the six methods of informing customers of the contents of the bottled water contained in the draft report. In its comments, the ADA agreed with the FDA that the information should be provided by the listing of some content information and company contact information (address or phone number) on the label. Additionally for bulk water deliveries, the ADA agreed that information could be

distributed via pamphlets. The Association noted its support for the quickest, most efficient and accurate means to disseminate information about bottled water, including the fluoride concentration, to consumers and dentists.

The FDA issued its final report on August 25, 2000, detailing three methods that it determined appropriate and feasible for informing customers of the content of bottled water. The first called for placing company contact information through an address or phone number on the label. The second method called for information by the combination approach where particular pieces of the CCR-type information would be placed on the label with the remainder of the information available through contact with the company by mail or phone (address or phone number placed on label). Lastly, the FDA concluded that it was appropriate and feasible that bulk bottled water customers could be notified of the contents of bottled water by distributing an information package with the bulk water deliveries.

In its report, the FDA also made the point that the SDWA had called for a published study on the feasibility of appropriate methods, if any, of informing customers of the contents of bottled water. There was no language in the SWDA requiring the FDA to issue regulations on this topic. While the FDA commented that it plans "to consider, based on the findings in the final feasibility study, whether to engage in future rulemaking on information requirements on the contents of bottled water," no further action has been taken to date.

References

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5. 60 *Fed. Reg.* 57079 (November 13, 1995).
6. 62 *Fed. Reg.* 60721-23 (November 12, 1997).