

Topic: Government regulation is the answer for the safe consumption of bottled water.

Task: #7 Outline or Scaffolding the Topic (100 Points)

1. Is government regulation the answer for the safe consumption of bottled water?
2. Government regulation is the answer for the safe consumption of bottled water as it has historically conducted frequent safety checks and awareness for municipal water, national standards for all bottled water are beneficial, and government does not have a monetary interest in bottled water, however, there is an argument for private corporations being the answer as they can focus only on their product, and government standards can fall behind newer, safer corporation's regulations.
3. Reason 1 - Government has historically conducted frequent safety checks and awareness for municipal water

- a. Example 1 - "A city of one million is tested 300 times, a city of three million is tested between 400-500 times a month; that's why we know instantly when there's a problem with our tap water, because its constantly being tested." (Soechtig, 2010)

Frequent testing is done by the EPA (Environmental Protection Agency) in order to ensure there are no problems with tap water. This highlights the government involvement in making sure the water citizens are drinking is safe. Any problem found with the tap water can be instantly found and resolved, further ensuring the safety of citizens; there are not simply identifying a problem, they are solving it as well.

Stephanie Soechtig is an experienced producer and director, known primarily for making documentaries. She has received several awards from international film festivals for role in directing "Tapped". In addition to directing, she has done multiple interviews for the documentaries she has made. While she does boast experience, her educational background is unknown, indicating a lack of expertise in any field of study, let alone the specific topics of her documentaries.

The frequent testing done on tap water by the EPA illustrates the multiple precautions the US government takes in allowing for the safe consumption of bottled water, along with the quick solutions that it presents to potential problems.

- b. Example 2 - "UNW-DPAC organized an open "Dialogue on Water Safety Plans", a "consultation on water operators' communications best practice guide" and a "brainstorming session for the preparation of a plan for advocacy and communication for water regulators". The need to have campaigns aimed at

exceptional circumstances- including deteriorating water quality and health hazards (such as in Lake Constanze). The companies were struggling. It is important to have information campaigns ready to warn the population to get prepared and make provisions for this." (Summary Report on UNW-DPAC, 2012) Although there are standards and regulation in place, organizations like the World Health Organization (WHO) still strive for ongoing progress in terms of regulating water. Ideas are put forth by multiple individuals and combined to change regulations as well as make campaigns directed towards ensuring safer water. In addition, the meeting also worked towards campaigns to inform people

of potential dangers of water, and how they can prepare for this, raising awareness over the issue of unclean water.

The WHO (World Health Organization) is a branch of the UN that sets international regulations for the quality of water that must be met, among other responsibilities. This organization is non-partisan and seeks to assist people in need, along with setting standards to maintain and improve the regulation of countries that are not in immediate need. The WHO was founded in 1948, and continues to work towards the goal of building a better, healthier future for the global population. However, as they are an international organization, some countries might need different forms or levels of regulation with potential consequences of being spread too thin over the world.

The ongoing efforts of the WHO to improve water regulation standards, informing the population of potential municipal water threats, as well as having previously worked upon the quality of water illustrates the power it can lend to governments in order to implement these standards to ensure a safe standard of municipal water.

4. Reason 2 - National standards for all bottled water is beneficial

- a. Example 1 - “For news of standards, SDE has come to meet the needs of Senegalese for access to quality water. In SDE, standards help to manage business operations to provide health and safety conditions at work, which are positive for employees and suppliers of SDE.” (Senegal Drinking Water Standards, 2015)  
The ISO helps to put in place standards that can be used consistently to ensure that materials, products, processes and services are fit for their purpose. In this case, the ISO utilized their standards for the SDE, a business that provides water in Senegal. From these standards, more people have gotten reliably clean water, along with SDE employees receiving other benefits.

The ISO is an international organization that puts standards into place to benefit businesses that need them. They facilitate sustainable water management and increase water potential, helping alleviate water scarcity and contributing to achieving the UN's Sustainable Development Goals. Finally, the ISO boasts a large total membership of 163 national standard bodies. However, as they do want to implement their standards in as many businesses throughout the world as possible, the overall global impact of their standards could be exaggerated.

The ISO's implementation of standards into the SDE in Senegal, along with many other places, illustrates the ability of and impact that national standards can have on bottled water, with the ISO working alongside other businesses and governments to help implement the standards that worked so successfully.

- b. Example 2 - “These two organizations (FAO and WHO) significantly influenced the development of drinking water regulations and standards internationally. The Codex Alimentarius is a collection of standards, codes of practice, guidelines and other recommendations. Some of these texts are general, and some specific. There are several standards in the codex that deal with drinking water. Many of them deal specifically with bottled water.” (Tischler, 2007)

This article illustrates the origins of how international organizations developed and updated water regulations and standards that are used today. The regulations put in place by the Food and Agriculture Organization (FAO) and WHO have

allowed for countries to implement a system in which they can routinely have access to clean drinking water in multiple forms. These organizations paved the way for future standards put in place by other organizations and governments, according to specific demands and needs.

Steve Tischler is director of sales and marketing for National Testing Laboratories. This position involves experience in the field of water regulations, as the testing and regulation of water are connected. National Testing Laboratories has allowed for both municipal and bottled water to be tested for possible contaminants, and integral part of the regulation of water. While Steve does have experience with NTL, he is not testing the water himself, rather he is the chief salesperson for the services the company provides, indicating a lack of direct experience and possibly swaying the article in order to generate more customers to utilize the services provided by NTL.

This article puts into perspective the historical framework that WHO and FAO have laid in order to create as well as improve upon water regulations and standards so that people have access to not only safe municipal water, but bottled as well.

5. Reason 3 - Government does not have a monetary interest in bottled water

- a. Example 1 - "In Canada, bottled water is regulated as a food and therefore it must comply with the Food and Drugs Act. The federal responsibility for the regulation of bottled water sold in Canada is shared by Health Canada and the Canadian Food Inspection Agency. Standards for microbiological quality are based upon data collected through Canada wide surveys on these products, reviews of international data, and consultation with bottled water associations, scientific experts and other clients involved in this industry." (Health Canada, 2013)  
Health Canada and the Canadian Food Agency are both dedicated to making sure the citizens of Canada are safe in terms of medical concerns and food products consumed; this is their sole purpose, no mention of a monetary reward from the corporations. The Canadian government is not a direct consumer of the bottled water industry; they remain non-partisan in this manner. In addition, these

agencies confirm and compare their findings with international standards and other regulatory procedure, further ensuring the safety of their water with no monetary reward.

Health Canada is the Federal department responsible for helping Canadians maintain and improve their health. They conduct ongoing consultations with Canadians to determine how to best meet their long-term health care needs. The Minister of Health, Jane Philpott, has attended several respectable colleges and completed a Master of Public Health degree. Although this federal department does play an important role, the information it provides is specific to Canada, and cannot be generalized to other countries in terms of international standards. Overall, the federal departments in Canada involved in regulating bottled water only seek to make sure the water is safe and uncontaminated, with no monetary interest to shift their regulation method or policy.

- b. Example 2 – "According to data collected and published by the Congressional Budget Office (CBO), federal, state and local governments in the United States spent more than \$2.2 trillion in the last 59 years on operations,

maintenance and capital infrastructure of water and wastewater utilities. That equates to more than \$4,131,000,000,000 in 2014 dollars, adjusting for inflation of infrastructure-specific costs.”

This source puts into perspective how much governments spend on making sure water is held to a high standard and continually updated. Trillions of dollars have gone in to making sure water is safe, along with wastewater facilities. Any amount of monetary incentive from bottled water would be massively overwhelmed by the 2.2 trillion dollar spending, looking at the government as a whole.

Shadi Eskaf joined the Environmental Finance Center in 2004 and has worked on environmental finance projects in local, statewide, and national settings. Eskaf has earned multiple degrees in engineering and environmental fields. He also has worked for the World Bank, displaying experience at an international level as well. However, Eskaf does not specialize in government nor regulation of water, looking primarily at government reports for his article.

The amount spent by the US government on water related standards and regulation shows that monetary interest would be trumped by this large amount spent.

6. Counter-Reason 1 - Government standards can be behind newer, safer corporation standards
  - a. Example 1 - “Chinese tap water actually has to meet higher standards than bottled water. Tap water must meet 106 different quality checks, but only 20 for bottled water... Europe and the US have over 100 standards for any kind of drinking water; we in China cannot do this. There are no conditions for this. Like in our location, there are around 40 standards, and even these cannot be met.” (China's Murky Bottled Water Industry Uses Soviet Era Standards, 2013)

This quote illustrates that the Chinese government had outdated standards for bottled water, going back almost 50 years. The government was responsible in this case, and bottled water has frequently been recalled for contamination. Different governments are at different places in terms of development of water standards, leading to health inequalities across countries.

Qi Qinhong is the Deputy Director of Guangxi Qinzhou Tap Water Company. He has had several years of experience working as this position. He came forth to report the information despite their being potential consequences, showing his intentions of truly wanting information to be public. However, Qi Qinhong's education is unknown.

The Chinese government having outdated standards shows how government regulation of bottled water is not always the safest option, as different governments put in place different standards, leading to different levels of safety for the people drinking water.

- b. Example 2 - “By federal law, FDA regulations governing the safety and quality of bottled water are as stringent as the Environmental Protection Agency (EPA) regulations that govern tap water. And, in some cases, the bottled water regulations are more stringent. At the federal level, bottled water must comply with the Federal Food, Drug, and Cosmetic Act (FFDCA) (21 U.S.C. §§ 301 et

seq.) and several parts of Title 21 of the Code of Federal Regulations. Section 410 of FFDCA requires that FDA's bottled water regulations be as stringent and as protective of the public health as the EPA's tap water standards." (IBWA, 2016) This source shows the multiple precautions bottled water companies take in the United States to ensure that their product is safe and in accordance with all existing regulations. In some cases, they go beyond what is required by the FDA to make sure the bottled water is safe. They illustrate that the precautions taken for bottled water are just as "stringent" as standards set forth by the EPA, if not more.

The IBWA consists of prominent, international bottles, distributors, and suppliers. The members of the IBWA have a lengthy amount of experience in the field as well as dealing with the safety of bottled water. In addition to providing bottled water, they seek to inform people on the safety precautions taken ensuring that bottled water is safe. However, the information they put out will always be slanted towards bottled water being absolutely safe, with no room for potential problems.

Overall the IBWA illustrates the multiple safety precautions and regulations followed for the making and distributing of bottled water, although it would not be in their interest to show any other side in terms of how the making is always carried out.

7. Counter-Reason 2 – Private corporations can focus only on their product
  - a. Example 1 – “Our quality control process begins with source selection and continues through bottling. Our trained and dedicated staff tests samples many times throughout our production process and water quality analysis to help ensure

that our products meet Food and Drug Administration (FDA) and industry quality standards. Gallon for gallon, our bottled water exceeds testing requirements for municipal water supplies. Our multi-step quality control process ends with a hygienically sealed bottle for safety, quality and a fresh taste.” (Our Water Processes, 2016)

Nestlé not only meets the FDA industry quality standards, but exceeds it. Private corporations have the ability to implement more standards and regulations in order to ensure the quality of their product. Nestlé is trying to convince the reader that it's water is much better than tap water, and implies it is the best bottled water product.

Nestlé Waters is a company primarily known for its bottled water brand. This company has had decades of experience in making bottled water products, as well as handling multiple legal cases regarding their water and water rights. Nestlé Waters serves customers in 130 countries, with 52 well-known bottled water brands and is, in turn, a subsidiary of the world's largest food company, Nestlé, S.A, based in Vevey, Switzerland. While this company does have a lot of experience, they are a company that is ultimately trying to sell people their bottled water product, so the statements and claims made are often exaggerated; additionally, they have been scrutinized for the approach they took for water rights, as touched upon earlier.

Overall, Nestlé Waters illustrates that companies have the ability to exceed the minimum standards set by government regulations, however, whether the companies truly do exceed this standard is another matter.

- b. Example 2 – “What’s the secret for perfectly pure tasting water? Our 7-step purification system. It takes out the stuff other bottled waters leave in... Aquafina is purified drinking water that meets and exceeds the requirements set forth by the U.S. Environmental Protection Agency (EPA), the U.S. Food and Drug Administration as well as local regulatory requirements. Our Aquafina plants each conduct on average 320 tests daily, 1950 tests weekly, and – when we include off-site monitoring, 102,000 tests annually to assure the consistent quality of our Aquafina bottled water.” (Aquafina, 2015)

Similar to Nestlé, Aquafina boasts that it not only meets requirements by the FDA, but the EPA as well. It even goes a step further and states that it is the best bottled water product on the market, something implied but not explicitly stated by Nestlé. If these number of tests are accurate, they far outmatch the number of tests that municipal water goes through.

Aquafina is a brand of bottled water owned by PepsiCo, one of the largest companies in the world. It boasts extremely frequent testing of its bottled water to ensure a high standard of quality. Aquafina is an international brand, sold all throughout the world. However, it is still ultimately a company that is trying to promote its product; in addition, in early 2015 Aquafina admitted that its “Mountainside Spring Water” was in reality tap water, regulated by the EPA.

### **Reflection:**

Once again, Aquafina shows us that private corporations do have the ability to surpass standard national regulation, with the ability to focus in on the company by itself, and not have to worry about making a regulation standard for every bottled water company out there.

In researching how bottled water is regulated and the difference of views between agencies such as the EPA and corporations such as Nestle, I found that it is extremely hard to agree on anything in comparison. I expected that both sides would have something negative to say about the other, but it is not just negative viewpoints; they cannot agree on facts. One side might state that bottled water is extremely unregulated and dangerous for consumption, while the other might say just the same about municipal water. I also realized the effects that standards have in regulating water and how much that can change an area in need, recalling the Senegal business success. I believe that government regulation is the answer for bottled water, as private corporations can try to jump through loopholes or submit their own tests of bottled water. I think more people should know how the bottled water they are drinking is regulated; what kind of testing it goes through, where is the source, and much more. Overall, I think people need to be more informed on the water they put in their body, as it is essential for survival, but can have negative consequences depending where you get it from.

**Conclusion:** Government regulation has been proven to be the answer for the safe consumption of bottled water because it has historically conducted frequent safety checks and awareness for municipal water, national standards for all bottled water are beneficial, and government does not have a monetary interest in bottled water, however, private corporations are a close competitor

as they can focus only on their product, and government standards can fall behind newer, safer corporation's regulations.

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