July 16, 2019

Peter Clark – News Desk Editor
Sam P. Jacobs – Executive Editor
Edward Felsenthal – Editor-In-Chief
Time Magazine
225 Liberty Street
New York, NY 10281

To: editors@time.com
cc: Marc Benioff, ceo@salesforce.com
Markham Heid, mheidj@gmail.com

Dear Time Magazine Editors,

We are writing in regard to your article "*Your Bottled Water Probably Has Plastic In It. Should You Worry?*" published on www.time.com on May 29, 2019. This story by Markham Heid makes numerous false and misleading statements, which we want to correct.

Mr. Heid's article reports on studies in a biased and inaccurate manner. The reality is that there currently is no scientific consensus on analytical methods to measure microplastic or their potential health impacts. Therefore, reports in the media and online, such as *Time's,* do nothing more than confuse and unnecessarily scare the public.

The International Bottled Water Association (IBWA) contacted both Mr. Heid and Mr. Felsenthal several weeks prior to this story's publication requesting that industry's perspective be heard. However, our requests were ignored by both your writer and editor-in-chief, resulting in an inaccurate and unbalanced article.

We therefore kindly ask that you review the information provided below and update your article to more accurately reflect the facts about bottled water quality and safety with regards to microplastics.

- Microplastic particles are found in all aspects of our environment – soil, air and water. While many of the articles on microplastics have focused solely on bottled water, it is important to note that thousands of other food and beverage products also use plastic containers.

- Data on microplastics is still limited and conclusions are not reliable and differ from one study to another. This is because there is currently no official standardized methodology to measure microplastics, nor is there scientific consensus on exposure and impact on health. For example, the Nile Red dye method that is sometimes used is unreliable for measuring microplastics, as it can pick up mineral content and produce false positives. Additionally, as the size of a microplastics particle can be ten times smaller than a hair,

they can be found all around us, on surfaces or in the air. This can impact the analytical results if laboratories are not following a very rigorous protocol, with strict precautions, to minimize the occurrence of "cross contamination."

- In stark contrast to conclusions drawn in *Time's* article, a scientific study published in February 2018 in the peer-reviewed journal *Water Research*—"Analysis of microplastics in water by micro-Raman spectroscopy: Release of plastic particles from different packaging into mineral water" by Schymanski et al.—concluded that no statistically relevant amount of microplastic can be found in water in single-serve plastic bottles.

- And a more recent *Water Research* study (2019)—"Microplastics in freshwaters and drinking water: Critical review and assessment of data quality," by Koelmans et al.—reviewed 50 microplastic studies, found that only four of these studies passed research quality standards, and concluded that more data is needed to accurately evaluate potential exposure and risk for human health. (This study was financially supported by the World Health Organization.)

- Recent findings[1] in Europe suggest that more than half of all microplastics in the environment are caused by car tires and building construction. Washing synthetic clothes or the abrasion of shoe soles are also known to contribute, along with littering and poor plastic waste management.

- The bottled water industry in the U.S. and Europe is committed to providing consumers with the safest and highest quality products, and we are following any scientific developments on this subject closely. The European Federation of Bottled Waters (EFBW) has set up a platform for the scientific community and laboratories to facilitate collaboration on the topic and advance understanding. Indeed, EFBW and IBWA believe that it is vital to develop robust and standardized testing methods in this area for the common benefit. The ambition of the EFBW is that by the end of the year the work of this platform will contribute to the standardization processes about to start at the international level (ISO[2]) and at the European Union (CEN[3]). The objective is to define harmonized analytical methods for microplastics in all drinking water, whether from a natural source or through the municipal tap systems.

- Consumers can remain confident that bottled water, like all food and beverages, is strictly and comprehensively regulated in the United States by the U.S. Food and Drug Administration (FDA) and in Europe by the EU food and drink legislation, and is safe to drink.

- Because there is no scientific evidence to suggest that microplastic particles pose a health risk, neither the FDA nor EU has issued any regulations concerning these substances in foods and beverages. Any regulatory action concerning microplastic particles would need to be based on sound science, including demonstrating a

[1] https://bit.ly/2P9svJs
[2] International Organization for Standardization
[3] European Committee of Standardization

correlation between the levels of this substance found in foods and beverages and any potential adverse health effects.

- Bottled water, as a packaged food product, is strictly and comprehensively regulated.
    - In the U.S., all bottled water products are produced utilizing a multi-barrier approach. From source to finished product, a multi-barrier approach helps prevent possible harmful contamination to the finished product as well as storage, production, and transportation equipment. These operations are effective in safeguarding bottled water from microbiological and other contamination. Measures in a multi-barrier approach may include one or more of the following: source protection, source monitoring, reverse osmosis, distillation, micro-filtration, carbon filtration, ozonation, and ultraviolet (UV) light.
    - In Europe, all natural mineral and spring waters must come from a naturally pure underground source well protected from all risk of human pollution. They are bottled at the source. Both types of waters must be safe to drink at source in their natural state and may not be disinfected nor chemically treated. Alongside regular testing and monitoring at the source and throughout the entire bottling process, this guarantees the product reaches the consumer in the utmost quality. In the EU, more than one million quality analyses are conducted annually by producers' quality assurance units and by accredited external laboratories.

People in the U.S. and Europe are making great efforts to live a better lifestyle by choosing healthier foods and beverages, and drinking water – tap, bottled, or filtered – should be encouraged. With the high rates of obesity, diabetes, heart disease, bottled water provides a safe, healthy, convenient beverage choice. Discouraging people from choosing this healthy drink option is not in the public interest.

Sincerely,

Joseph K. Doss
President and CEO
International Bottled Water Association
703-647-4605| Jdoss@bottledwater.org

Patricia Fosselard
Secretary General
European Federation of Bottled Waters
Patricia.FOSSELARD@efbw.org

About EFBW

The European Federation of Bottled Waters (EFBW) is the voice of the European bottled water industry, dedicated to promoting the unique qualities of natural mineral and spring water. EFBW is a registered international not for profit trade association with a membership base of national trade associations and direct member companies. In total, EFBW represents almost 550 natural mineral and spring water producers in Europe. For more information, please visit www.efbw.org

About IBWA

The International Bottled Water Association (IBWA) is the authoritative source of information about all types of bottled waters, including spring, mineral, purified, artesian, and sparkling. Founded in 1958, IBWA's membership includes U.S. and international bottlers, distributors and suppliers. IBWA is committed to working with the U.S. Food and Drug Administration (FDA), which regulates bottled water as a packaged food product, to set comprehensive and stringent standards for safe, high-quality bottled water products. In addition to FDA regulations, IBWA member bottlers must adhere to the IBWA Bottled Water Code of Practice, which mandates additional standards and practices that in some cases are more stringent than federal and state regulations. A key feature of the IBWA Bottled Water Code of Practice is a mandatory annual plant inspection by an independent, third-party organization.

www.bottledwater.org