



August 28, 2014

Dr. Kelly Hislop, PhD.
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Dear Dr. Hislop;

On behalf of the Canadian Bottled Water Association (CBWA)¹ membership, thank you to the Chemical Health Hazard Assessment Division for their work to update Division 15 of *the Food and Drug Regulations*.

CBWA is pleased to provide comments on the Proposed Changes to the Tolerances for Arsenic and Lead in Fruit Juice, Fruit Nectar, Beverages when Ready-to-Serve, and Water in Sealed Containers.

We applaud Health Canada for its recommendation to lower the tolerances for arsenic and lead in water in sealed containers (bottled water, including mineral and spring water) to 0.01 ppm within Division 15 of the *Food and Drug Regulations*. This is in line within the maximum acceptable concentrations (MACs) for arsenic and lead outlined in the *CBWA Bottled Water Model Code*² at 0.01 ppm on both parameters. For your convenience, a full copy of the CBWA Bottled Water Model Code is attached for your review.

As a member of the International Council of Bottled Water Associations (ICBWA), the CBWA works closely with Codex Alimentarius Commission on all direct and indirect regulations that apply or could apply to bottled water; including Natural Mineral Waters and Bottled Water Other Than Natural Mineral Waters. CBWA fully supports the proposed arsenic and lead limits within Division 15 of the *Food and Drug Regulations* in its efforts to harmonize with Codex Standards.

¹ The CBWA is a trade association representing the bottled water industry in Canada since 1992. Our trade association represents bottled water producers, distributors, and suppliers from coast to coast in Canada. All members must comply with the CBWA Bottled Water Model Code, including passing to an annual third party inspection, ensuring our membership adhere to industry standards as outlined in the CBWA Bottled Water Model Code.

² CBWA Bottled Water Model Code; <http://www.cbwa.ca/index.php/resources/technical-training-tools>



All bottled water is required to meet the standards as set out in the *Guidelines for Canadian Drinking Water Quality*. This was confirmed in a recent report of the Auditor General of Canada, *2009 March Status Report of the Commissioner of the Environment and Sustainable Development*.³ Specific information listed in Chapter 1, page 36, is the recommendation resulting from their detailed review of the bottled water industry:

1.41 Health Canada should set clear timelines and revise the Food and Drug Regulation that relate to bottled water safety so that they refer to the Guidelines for Canadian Drinking Water Quality. (1.38 - 1.40).

CBWA supports the Auditor General of Canada's recommendation and the Proposed Changes to the Tolerances for Arsenic and Lead in Fruit Juice, Fruit Nectar, Beverages when Ready-to-Serve, and Water in Sealed Containers. We remain hopeful with examples such as this proposal, that improvements to the *Food and Drug Regulations* will continue to be a constructive and shared consultative process. CBWA board of directors, membership and staff are fully committed to engage in the regulatory process to make strong science based amendments that ensure the quality and safety of bottled water products, and protects the health of Canadians.

Sincerely,

A handwritten signature in cursive script that reads 'Elizabeth Griswold'.

Elizabeth Griswold
Executive Director

cc: CBWA Board of Directors
CBWA Technical Committee

Attachments:
CBWA Bottled Water Model Code

³ 2009 March Status Report of the Commissioner of the Environment and Sustainable Development; Chapter 1—Safety of Drinking Water
http://www.oag-bvg.gc.ca/internet/English/parl_cesd_200903_01_e_32285.html