

HALIFAX REGIONAL
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Item No. 9.1.2

March 26, 2009

Mayor Peter Kelly
Mayor's Office
1841 Argyle Street, Main Floor
PO Box 1749
Halifax, NS B3J 3A5

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Distributed to:

- Councillors Meeting Regional Council
- Mayor
- CAO Date: March 31/09
- DCAOs
- Solicitor Item No. 9.1.2
- Communications
- Other J. Church

Dear Mayor Kelly:

The reason for this letter is to clarify much of the confusion and misinformation that exists about bottled water and to offer the Canadian Bottled Water Association (CBWA) as a resource to provide you with factually based information. All statements contained within this document can be verified by independent, arms length third parties.

Recently, it has come to our attention that the City of Halifax is considering a proposal to ban the sale of bottled water from all City buildings and facilities. One of the reasons often cited is that municipal tap water, which is safe and clean, is available so the bottled water alternative is not necessary.

This argument might have some merit if consumers were buying bottled water as an alternative to tap water. However, according to a study conducted in May of 2008 by Probe Research Inc., 70% of adults who purchase bottled water do so as an alternative to buying other packaged beverages, not as an alternative to tap water. As well, CBWA members bottle spring (ground) water, which represents 90% of bottled water sold. As a regulated food product, natural spring water cannot be modified from its natural state (cannot modify compounds, mineral content or add chemicals). Many municipalities use surface water from rivers or lakes, adding chlorine and/or fluoride. So while one might say that water is water, these are in fact different products.

Some policy makers contend that too many plastic bottles end up in landfill. Policy makers should be reminded that water is not the only beverage product available in plastic bottles, in fact, a variety of beverages are available in this type of container. The bottled water accounts for about 9.1% of the entire Canadian beverage industry (Beverage Marketing Corporation, 2006), and plastic bottles account for 1/5 of 1 percent of waste in landfill.



This is further supported upon examination of recycling rates. According to provincial authorities such as Encorp Pacific, Alberta Beverage Container Recycling Corporation, Stewardship Ontario, Eco Enterprises Quebec, and Encorp Atlantic, 2007 recycling rates for plastic were between 60 to 85%. In fact, PET plastic trails only newspapers and aluminum in its value to recycling programs.

Polycarbonate and PET plastic bottles are 100% recyclable. The larger bottles for use with water coolers are typically reusable 40 to 60 times before the need to be recycled. Once recycled, these plastics are used to make everything from playground equipment to automobile parts.

The bottled water industry is certainly doing its part. The trend among our industry has been to develop and use bottles that are thinner and lighter, using less plastic – the weight of the typical water bottles is about half that of other packaged beverages. The CBWA and its partners have been working with local governments to assist in public spaces recycling programs and to increase ALL consumer packaging recycling in order to decrease landfill as well as litter.

One must also question why bottled water is being singled out, given the fact that water is the healthiest beverage option available. If bottled water were the only beverage to be sold in plastic bottles, that choice would be obvious. However, at a time when health providers and policy makers are struggling with sharply increased rates of diabetes and obesity, to ban the sale of calorie-free, sugar-free, and fat-free water, while continuing to allow the sale of other beverages sold in plastic bottles that cannot make these statements, is odd public policy indeed.

Some of the bottled water industry's critics allege that bottled water is not regulated. In fact, bottled water is regulated as a food by Health Canada. Water bottling companies are inspected by the Canadian Food Inspection Agency. Permits to take water must be applied for and obtained from provincial environment ministries. Bottling companies continuously test their product to ensure its quality, and CBWA members must adhere to the Association's stringent Model Code, which includes unannounced third party audits, as a condition of membership.

Others contend that the industry is privatizing water, or taking undue amounts of water resources, to the detriment of others. In fact, permit data from provincial environment ministries confirms that the bottled water industry in fact takes a fraction of 1% of total permitted takings. Put another way, the entire bottled water industry takes as much water out of the ground in a year as 10 golf courses.



Finally, there is the issue of cost. Comparisons have been made between the costs of bottled water to the consumer versus the cost of tap water. Obviously, tap water is the cheaper of the two. Independent market research firm A.C. Neilson has identified bottled water as costing 38 cents per litre (2007), or about 19 cents per 500 ml bottle, while municipalities correctly point out that tap water is available for a fraction of a penny per litre. Why, they ask, does anyone buy bottled water?

As stated above, consumers do not view bottled water as an alternative to tap water but rather as an alternative to other packaged beverages. Bottled water could not compete, on the basis of cost, with tap water. Like other beverages, bottled water will always be cheaper when purchased by the case (i.e. 24 units) as opposed to purchasing one individual serving from a convenience store or vending machine.

While the decision to ban bottled water from city halls, community centres and skating rinks is largely symbolic, there are some concrete and positive steps that policy makers can take in order to make a real difference. First, increase the number of recycling receptacles and containers in public spaces. History has demonstrated that the public will participate in recycling programs when they are available. Secondly, conduct enhanced public education campaigns about litter and recycling, whether that litter and recycling consists of a plastic bottle or a paper cup, so that littering becomes socially unacceptable and recycling becomes the standard even when out of the home. Finally, the CBWA encourages municipalities to not only maintain their current high standards for tap water, but also to instill greater public confidence in their water infrastructure. Canadians should feel confident about their public services.

The CBWA would be interested in meeting with you in April as the CBWA is holding its annual convention in Halifax, to discuss in more detail the points briefly outlined in this letter, and other important matters regarding the bottled water industry. Please feel free to have your staff contact me direct through my office at (905) 886 6928 to arrange a convenient date and time for us to meet. We look forward to providing you with details on the bottled water industry and understanding the needs of the City of Halifax.

Sincerely,

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

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