



**Nestlé Waters North America  
Q & A regarding Environmental Working Group (EWG)  
study released on October 15, 2008**

*Answering questions raised in the media related to the report*

**NOTE: None of the water products brought up in the articles based upon the Environmental Working Group (EWG) study released on October 15<sup>th</sup> were supplied by Nestlé Waters North America or any of our brands.**

*Do any of your brands of water violate the California regulations as the two brands mentioned in the article?*

We are in full compliance with all FDA, EPA, Canadian and US state regulations for bottled water. None of our products exceed regulatory limits for contaminants.

*Do you use chlorine or have any chlorine by-products (or trihalomethanes) in your water?*

Chlorine is frequently added to municipal water supplies as a disinfection agent. Trihalomethanes (THM's), which include trichloromethane (or chloroform), tribromomethane (or bromoform), dibromochloromethane and bromodichloromethane, are carcinogenic at certain levels.

Nestlé Waters does not use chlorine for its spring waters, except in the case of Texas, where a state law requires the addition of chlorine for transporting any water intended for human consumption, regardless of the initial quality of that water. However, for these sources in Texas, as well as for all municipal water we use, we employ additional filtration before bottling to both chlorine and THM's, and ensure levels are less than 0.0005 mg/L compared to EPA and FDA regulations, which allow up to 0.08 mg/L.

*Do you have pharmaceuticals in your water?*

We strive to select spring sources to protect against the potential for chemical contamination, including by pharmaceuticals. For non-spring waters, we employ additional filtering steps including carbon filtration and, where appropriate, reverse osmosis, to remove pharmaceutical contaminants.



### ***Do your waters contain fertilizers, pesticides or micro organisms?***

**Fertilizers/Nitrates** -- Nitrate is a naturally occurring chemical at low levels in groundwater. However, higher levels may occur in water exposed to fertilizer, leaching from septic tanks and erosion of natural nitrate deposits. We select low-nitrate spring sources and filter and purify our non-spring sources to ensure nitrate levels are less than 5 mg/L and in most cases less than 1 mg/L, one-tenth of the level allowed by EPA and FDA regulations.

**Pesticides/Herbicides** -- Pesticides and herbicides are substances (or mixtures of substances) intended to prevent, destroy, repel or mitigate insect or plant pests. We test for pesticides and herbicides either quarterly or annually, as required by state laws. Over the last 10 years, we have never detected pesticides or herbicides in our spring sources or finished product.

**Microorganisms** -- Microorganisms naturally occur in foods, including fruits, vegetables, yogurt and spring water. Some microorganisms are harmless or even good for you, while others can be harmful. High levels of harmful microorganisms, including E. coli, fecal coliform, cryptosporidium, giardia and certain viruses, can lead to a number of issues, such as diarrhea, cramps, nausea, headaches and other symptoms.

Two tests we rely upon to monitor for the presence of contamination include:

- *Heterotrophic Plate Count (HPC)*: In spring water, the presence of naturally occurring microorganisms called HPC is expected; indeed, the absence of these microorganisms would be a concern, because it could indicate the presence of chemical contamination. However, high levels of HPC may indicate bacterial contamination.
- *Total coliform*: Though not necessarily a health concern itself, total coliform is an indicator of potential water contamination by fecal coliform and E. coli.

We strive to select spring sources to protect against harmful microbiological contamination. For both our spring waters and for non-spring sources, we employ rigorous plant cleaning programs, microfiltration, ultraviolet light and, where appropriate, ozonation to filter out and prevent contamination from harmful microorganisms.

### ***What can you tell me about plastic leaching?***

In addition to glass, Nestlé Waters uses three types of plastic packaging in its products: PET, HDPE and polycarbonate. All of these plastics have been approved by the FDA as safe for food containers and are widely used within the food and beverage industry. We continually evaluate packaging materials to ensure they are safe for our customers. We abide by all FDA regulations and will continue to do so.

The available scientific evidence indicates that bottled water is safe when stored properly and consumed in a reasonable amount of time. We recommend



consumers treat bottled water as they would any food product and store it at or below room temperature, out of direct sunlight, and away from solvents and chemicals.

### ***Is bottled water safer than tap?***

Bottled water is a safe product. It is regulated by the [U.S. Food and Drug Administration \(FDA\)](#) as a food product, and these regulations, by law, must be as strong and protective of public health as the EPA's regulations for tap water.

Our bottled waters come in mainly two types – spring water and purified water. Our spring waters come from carefully selected springs that are usually in less developed areas. We purchase acres of land around most of our spring sources and leave it as open space as an added measure of protection.

Purified water, like our Nestlé® Pure Life® branded water, may begin as groundwater or municipal water, but goes through significant processing including granular activated carbon and reverse osmosis, which are specialized treatments not typically used in municipal supplies.

Our waters are further protected by a comprehensive testing scheme. We test incoming water for every line at our manufacturing plants, and also test samples of water produced on every line everyday.

The sealed bottle itself also preserves the quality of the water by providing a barrier to outside exposure.

If you'd like to know more about the quality of our waters, please refer to our water [quality reports](#), similar to those published by public water utilities. These are published for all our brands. They are available online or by calling the toll-free number on your bottle label.

Tap water in the U.S. is also known to be high quality and safe. Information about tap water quality can be found at the [Environmental Protection Agency Web site](#).

### ***What processes do you use to ensure quality?***

On a per-gallon basis, we test our water as often as, or more often than, municipal water sources. For example, in the case of coliform, an indicator of contamination, we conduct one test for every 40,000 gallons of water. By comparison, a large municipal supplier conducts one test for every 2.7 million gallons of water processed. In many cases, we also test our water on a frequency basis as often as, or more regularly than, required by the EPA and FDA. For example, we test for bromate daily on every production line in every factory, whereas municipal water suppliers are only required to test monthly.



In the U.S., municipal water supplies are regulated by the U.S. Environmental Protection Agency (EPA) under The Safe Drinking Water Act, and the bottled water industry is regulated as a food product by the FDA under the Bottled Water Regulations (which dictate water quality standards) and under the Current Good Manufacturing Practices (which dictate standards for the processing and manufacture of bottled water). The Safe Drinking Water Act also requires that bottled water meets all of the requirements of municipal water supplies. Together, these regulations mandate the testing of over 50 constituents at specified intervals to ensure that bottled water meets these standards.

In light of these regulations, Nestlé Waters has developed internal standards based upon both sets of regulations, which meet or are more stringent than regulatory standards in all cases. We test our finished product for every constituent required by the EPA and FDA, and our allowable limits for regulated parameters are more stringent than both EPA Primary Standards and FDA Standards of Quality guidelines. The only exception is for radiological parameters, where we use the same regulatory standards. Our standards also meet individual state regulations, as well as Canadian regulatory requirements, which are almost identical to those in the U.S.

## **ADDITIONAL QUALITY PROCESS INFO**

### ***Our 10-Step Quality and Safety Process***

Nestlé Waters uses a 10-step process to ensure the quality and safety of our water products made in the U.S. and Canada:

1. *Source selection and monitoring:* We select spring sources based on the water's natural composition, surrounding land use, quality, availability and taste. Our 10 full-time Natural Resource Managers, trained hydrologists, geologists and engineers monitor our spring sources and manage them for long-term sustainability. We select non-spring sources (water from groundwater and surface water sources) based on location.
2. *Source water receiving and monitoring:* We transport water to our bottling facilities through food-grade sanitary stainless steel or high-density polyethylene (HDPE) pipelines or tankers, or we receive it directly from a municipal water supplier. For water received from municipal sources, we use additional filtration to remove chemicals, such as chlorine (added by the municipal water supply as a disinfectant) and trihalomethanes (a disinfection by-product). Additionally, reverse osmosis filtration is employed to remove unwanted minerals and potential contaminants from municipal water sources.
3. *Water storage and monitoring:* Water is temporarily held in food-grade storage tanks, where we conduct further tests to ensure conformance to our safety and quality standards.
4. *Microfiltration:* Advanced sterilizing-grade microfilters are used to remove unwanted bacteria from the water, should they be present.



5. *Ultraviolet light/ozone disinfection:* Ultraviolet light or both ultraviolet light and ozone are additional barriers that help eliminate the potential for unwanted microorganisms. Ultraviolet intensity and ozone level are monitored and verified regularly to ensure effectiveness.
6. *Packaging control:* Most bottles are manufactured on-site to enhance quality control as well as to save energy and costs which would be incurred by shipping empty bottles to plants. Packaging that does not meet internal standards is rejected. We control and monitor bottles and caps, and label them by lot for tracking purposes.
7. *Bottling control:* We test samples during the filling and capping process to monitor water quality and prevent contamination. We also monitor the capping process to ensure bottles are properly sealed to maintain the integrity of the product. This eliminates the need to chlorinate our finished product. Each bottle is given a specific code that includes the plant location, bottling line and time produced to ensure traceability.
8. *Clean-in-place sanitation process:* At a minimum of once a week, we apply an automated cleaning process to ensure that plant production lines are sanitary and constantly maintained at a high level of hygiene.
9. *Plant quality assurance and HACCP program:* Each Nestlé Waters plant has a quality assurance department to manage quality processes. Additionally, we employ the U.S. Food and Drug Administration (FDA) Hazard Analysis Critical Control Point (HACCP) program to manage product quality. Bottled water is also required to meet strict Good Manufacturing Practices under FDA guidelines, which include specific requirements for plant construction, design, sanitary facilities and operations. These systems ensure that we meet both internal and international quality assurance standards.
10. *Corporate quality assurance system:* Independent from the plant quality assurance department, our Corporate Quality Assurance program sets company-wide standards and specifications, and independently monitors plant quality programs across our entire organization.

In addition to the steps described here, several of our products require additional process steps.

*Purified, Drinking and Flavored Waters:* After source receiving and monitoring, the water typically passes through a water softener, where hardness is reduced. We then demineralize the water through reverse osmosis, and move it to storage containers where we remineralize the water, adding a specific amount of minerals to achieve a desired taste. In the future, we may also employ partial reverse osmosis, which is effective in removing some minerals, but uses less energy and reduces waste water. For our flavored waters, we also add natural fruit flavors just before bottling the water.

*Sparkling Waters:* For our sparkling waters, we add carbonation just prior to bottling.



*Distilled Waters:* Similar to our drinking waters, the waters pass through a water softener to reduce water hardness. We then distill our waters before they are filtered.

*Mineral Waters:* In addition to microfiltration, we use activated alumina to remove excess fluoride in our mineral waters.

To further enhance the quality, safety and environmental aspects of our process, we are certifying all of our plants to meet the [International Standards Organization \(ISO\) Occupational Health and Safety Assessment \(OHSAS\) 18001](#), Environmental Assessment 14001, and Food Safety 22001 standards. All of these are internationally recognized management systems. This benefits consumers by ensuring that Nestlé Waters facilities follow appropriate standardization protocols for all areas affecting quality, environment, and occupational safety and health. In addition, we have implemented internal programs that require every functional area within Nestlé Waters to develop and track progress against quality and safety goals. Outside of our own processes, we also work with suppliers to ensure they meet agreed standards for food safety. Every year, we audit suppliers who provide critical ingredients and packaging materials (other than water, which is regulated as described in the next section) that have direct contact with our products to ensure they are complying with our internal food quality and safety protocols.