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October 26, 2015

Dietary Guidelines Communications  
Center for Nutrition Policy and Promotion  
U.S. Department of Agriculture  
3101 Park Center Drive, Room 1034  
Alexandria, VA 22302

*Filed electronically via Regulations.gov*

**RE: Docket No. FNS-2015-0032; Agency Information Collection Activities:  
Proposed Collection; Comment Request – Generic Clearance for the  
Development of Nutrition Education Messages and Products for the  
General Public**

Dear Sir or Madam,

On behalf of the members of the International Bottled Water Association (IBWA), I appreciate the opportunity to submit comments on the Center for Nutrition Policy and Promotion's (CNPP) proposed information collection to test nutrition and education messages and products developed for the general public. As stated in the CNPP announcement, the information obtained from this research will be used to "further develop the Dietary Guidelines and related communications." IBWA members believe that this type of research will help improve consumer understanding of the Dietary Guidelines for Americans (DGA) and related communications, such as the MyPlate nutrition guide. We believe Americans are looking for guidance about what to eat and what to drink. Our comments focus on the need to test consumer responses on including a depiction of water to the MyPlate nutrition guide in order to promote healthy hydration.

IBWA is the primary, authoritative source of information on bottled water. This includes all types of water, such as spring, mineral, sparkling, artesian and purified bottled water. Our membership includes over 700 United States and international bottlers, suppliers and distributors that are small, medium and large-sized companies. IBWA and the bottled water industry are committed to making safe and healthy products. In addition to U.S. Food and Drug Administration (FDA) and state regulations, IBWA member bottlers must adhere to the IBWA Bottled Water Code of Practice. In some cases, the FDA and IBWA standards for bottled water are more stringent than the U.S. Environmental Protection Agency (EPA) regulations for tap water.

Making healthy hydration a vital part of the wellness equation, along with a well-balanced diet and daily physical activity for all Americans, should be a clear focus of the 2015 DGAs. We support the Dietary Guidelines Advisory Committee's (DGAC) recognition of water consumption as a critical part of a healthy diet and urge you to highlight the importance of water for good health. Water plays a critical role in ensuring optimal nutritional health for Americans. It is essential to physiological functions and processes, such as fostering the cognitive health of our children and ensuring it in our aging senior population. Smart hydration choices and a healthy diet go hand in hand.

The science is clear on this issue, and researchers and clinicians are saying Americans should drink more water. Scientific studies clearly demonstrate the importance of water consumption, and science and health professionals are speaking up on behalf of water. For example, on September 10, 2014, fourteen researchers, scientists, nutritionists, clinicians, and public health professionals sent the attached letter to the Dietary Guidelines Advisory Committee (DGAC) asking them to strengthen the language on drinking water in the 2015 Dietary Guidelines and add a water graphic to the MyPlate nutrition guide.

This impressive list of academic endorsements of the importance of water consumption is supported by the government's own data. The U.S. Department of Agriculture's (USDA) National Health and Nutrition Examination Survey (NHANES) IV data show that older adults are not consuming enough water. Neither are children. Water accounted for only 29% of children's total fluid intake; the majority coming from soda, sports drinks and teas. Of children 4-8 years, 75% failed to satisfy the Daily Recommended Intake (DRI) for water. Dr. Adam Drewnoski, of the Center for Public Health Nutrition at the University of Washington, who conducted this study of NHANES data, concluded, "Increasing total water consumption can be achieved through various means, though promotion and encouragement of non-caloric beverages is likely to be the most successful avenue for increasing water consumption."

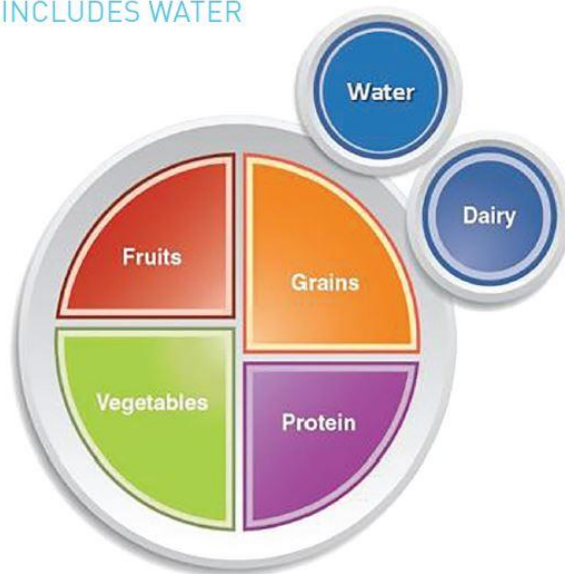
Consumers are listening. Americans' consumption of bottled water increased by 7.3 percent to 11 billion gallons in 2014 and bottled water sales were up 6.4 percent to \$13 billion (wholesale) over the previous year -- all this while the consumption of carbonated soft drinks is declining. Americans upped their annual bottled water consumption by almost 11 gallons per person during the period 2004 to 2015. It went from 23.2 gallons per person in 2004 to 34 gallons in 2014, according to Beverage Marketing Corporation (BMC). BMC reported that over the past five years alone, bottled water has increased its "share of stomach" of the overall beverage market from 14.4 percent in 2009, to 17.8 percent in 2014. To strengthen the scientific findings and consumers' desire to stay healthy, we encourage CNPP to test what consumers think of adding water to the MyPlate.

We want to make it clear that we believe the DGAs do not need to pit healthy foods and beverages against each other. No one supports healthy beverage choices, such as milk, more than our industry and we recognize the nutrient value of milk and its importance

on the MyPlate. We are, however, suggesting that consumers need to see water, along with milk and dairy, on the MyPlate nutrition guide.

According to a recent W. K. Kellogg Foundation poll, 90 percent of the people polled said that they support making water a preferred beverage in the new 2015 Dietary Guidelines for Americans. IBWA commissioned a study by the Artemis Strategy Group on different MyPlate visuals. One of the visuals included the current USDA/HHS MyPlate, which has a dairy cup icon next to the plate. Another visual had a cup of dairy and cup of water next to each other alongside the plate. Among the 76% of those surveyed who reported that they are very or somewhat likely to consume dairy when viewing the original MyPlate, 49% of them said they that they would drink both water and dairy when they saw a MyPlate visual that included both water and dairy.

IBWA'S PROPOSED MYPLATE REVISION  
INCLUDES WATER



The 2015 Dietary Guidelines and MyPlate will serve as a platform for Americans to begin or continue living a healthy lifestyle. We hope that both will include messaging and visuals that encourage healthy hydration habits, which should include the consumption of water, including bottled water. Americans should be healthier and drink more water. If we want Americans to drink more water, there should be a consistent “think water” encouragement in the Dietary Guidelines’ final recommendations. Delivery of this message to American families is critical.

We encourage CNPP to test the inclusion of water on the MyPlate and conform the guidelines to those adopted by other leading healthy nations. The message to drink more water is resonating around the world, and other countries that value health are adding water to the graphic representations of their dietary guidelines. For example, the Mediterranean Diet Pyramid includes drinking water as an essential component of a healthy diet. The DGAC has discussed the merits of the Mediterranean Diet during its deliberation of the 2015 Guidelines. The Japanese Food Guide also includes water at the top of its pyramid, recognizing water as an important element of a well-balanced lifestyle. Other countries such as France, Spain, Germany, and Austria include water in their dietary guidelines and depict water in their visual nutrition guides. We believe the CNPP should test what Americans think of adding water to the MyPlate and join these other countries by including water on this important consumer nutrition guide.

The bottled water industry supports the consumption of all forms of water, including bottled, filtered and tap water. We believe that encouraging the consumption of water enhances the quality of people’s lives. In a mobile society, bottled water helps people find their way to water and due in great part to the work of the DGAC there is an emerging culture of health in the U.S. IBWA commissioned an additional study by the

Artemis Strategy Group that examined which messages, phrases, wording, and advice would motivate people to drink water. The study found that consumers believe the most credible messages are also the most important in creating and supporting positive views about water.

The research found that the top three most credible messages for consumers are:

- Stay hydrated, choose healthy, drink water!
- Thirsty? Water is a great choice.
- Drinking zero-calorie beverages, such as water, instead of sugary drinks is widely considered a key component of a more healthful lifestyle.

We urge you to test these messages in your proposed collection of information and believe that this research will provide practical insights that can help in developing CNPP consumer education information, including Dietary Guidelines and MyPlate materials. IBWA would be happy to provide additional information on our research concerning the importance of promoting water consumption as CNPP sets out to test nutrition education messages.

Thank you for this opportunity to comment on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kristin Wilcox', with a stylized, cursive script.

Kristin Pearson Wilcox  
Vice President of Government Relations

Attachment: September 10, 2014 letter from public health professionals to the DGA