

## **Organizations that Support Allowing Bottled Water to be Labeled as Healthy**

*FDA Proposal: We seek comment on whether water should be included in the definition, and whether “water” should be expanded, for example, to include waters containing non-caloric flavors or other noncaloric ingredients. In addition, we also seek comment on whether allowing bottled water to be labeled “healthy” could potentially lead some consumers to believe that bottled water is healthier than tap water. We also seek comment on the eligibility of calorie-free beverages, coffee, and tea to bear the “healthy” claim.*

*(Docket No. FDA-2016-D-2335; pg. 59193).*

Several groups submitted the comments below in favor of allowing use of the term “healthy” on bottled water labels, including the New York City Department of Health, Center for Science in the Public Interest, American Society for Nutrition, and the Sustainable Food Policy Alliance.

### **New York City Department of Health - comments submitted January 11, 2023**

*Water and seltzer are the healthiest options when choosing a beverage. We support including unsweetened water and seltzer products in the definition. We do not support inclusion of products that utilize low- and no-calorie sweeteners (LNCS). The World Health Organization released draft guidance this year on consumption of LNCS, finding that LNCS may contribute to lower body weight and BMI when compared with sugar intake but not when compared with water. This WHO guidance also noted a possibility of long-term harm associated with consumption of LNCS, including increased risk of obesity, type 2 diabetes, cardiovascular diseases, and mortality, with further research needed to determine these observed associations. Additional research is also needed for children and pregnant women, as some studies suggests unfavorable impacts on birthweight and adiposity in offspring. Further, in the NYC Food Standards, we prohibit use of LNCS sweeteners for products served to children. Since there is no way to distinguish between child and adult consumption in a retail setting, we recommend the exclusion of waters containing LNCS.*

### **Center for Science in the Public Interest - comments submitted April 26, 2017**

*FDA should also exempt plain or sparkling water—without added caloric, low-calorie, or calorie-free sweeteners or other caloric ingredients—from the beneficial nutrient minimums to encourage consumers to choose water instead of sugar drinks.*

### **American Society for Nutrition - comments submitted February 16, 2023**

*ASN supports including plain unsweetened water, tea, coffee and carbonated water or seltzers under the definition of healthy.*

## **Sustainable Food Policy Alliance - Comments submitted on February 16, 2023**

*SFPA supports a comprehensive update of the definition of “healthy” to help people make the best choices for themselves and their families. Our member companies have long maintained that FDA’s definition should be based on the preponderance of scientific evidence, reflect the recommendations from the most recent Dietary Guidelines for Americans (DGAs), and focus on foods and meals that fit within nutritious eating patterns and calorie needs of all Americans, including the full range of cultural diets and foods. We appreciate that the proposed rule reflects these priorities. In particular, SFPA was pleased to see the following in the proposal:*

- *The inclusion of plain and plain carbonated water and its exemption from food group equivalent and nutrients to limit requirements. We support consumer choice and encourage the consumption of water, whether bottled or from the tap.*