



1700 Diagonal Road, Suite 650
Alexandria, VA 22314
Ph: 703-647-4616
Fax 703-683-4074
Web: www.bottledwater.org

July 9, 2021

Rae Eaton
Washington Department of Ecology
PO Box 47600
Olympia, WA 98504

RE: Draft Food Packaging Applications and Candidate Alternatives to PFAS for the Second Alternatives Assessment

Dear Ms. Eaton,

The International Bottled Water Association (IBWA) welcomes this opportunity to provide comment on the draft Food Packaging Applications and Candidate Alternatives to PFAS for the Second Alternatives Assessment. IBWA members put as much care into their packaging as they do their water, opting for materials that protect the health and safety of their consumers while leaving a small environmental footprint. Producing, transporting, and recycling plastic bottled water containers use much less energy than aluminum, cartons, and glass containers. In addition, because of bottle light weighting, bottled water producers have reduced plastic use by an average of 27 percent in recent years.

IBWA is the trade association representing all segments of the bottled water industry, including spring, artesian, mineral, sparkling, well, groundwater and purified bottled waters. IBWA's mission is to serve our members and the public by championing bottled water and other healthy hydration choices, while promoting an environmentally responsible and sustainable industry. IBWA represents bottled water bottlers, distributors, and suppliers throughout the United States, including several small, medium, and large size companies doing business in Washington.

As the Department of Ecology (DOE) further considers possible alternatives to packaging that contains PFAS, we would ask that you take into account several important factors of how this decision will impact Washington consumers as well as industry.

First, significant changes such as this to an entire process and production stream will cause major disruptions which translate into higher costs to consumers. As the state still struggles to emerge from the fiscal impact of COVID-19, additional costs to everyday consumer prices would be difficult for Washington residents to absorb at this time. According to the requirements of the alternative assessment, any alternative must be of a comparable price to the PFAS item it is replacing. However, even the slightest price changes can add up quickly when these items are bought in bulk quantities.

Second, the assumption that the use of “single-use, petroleum-derived plastics” will not be considered fails to provide consumers with an inexpensive, readily available, recyclable, and safe alternative. As well, given the recent passage and approval of a recycled content mandate for plastic beverage containers in the state, it would seem that bottled water and other beverages packaged in single-use plastic containers would actually be a better option than many others. Not only would the production of these containers to be used as an alternative utilize recycled plastic but it would also increase the feedstock within the state to assist manufacturers in reaching future mandate goals.

Finally, it would seem to be clear that the Executive Order cited as a reason for this decision by DOE applies only to the state purchasing process and IBWA believes it does not and should not apply in this case. Removing from consideration an entire material class, especially one that is easily recyclable and has a dedicated recycling stream, would be counterproductive to the intent of the original legislation.

Thank you for your consideration on this matter and please contact me should you have any questions.

Sincerely,

James P. Toner, Jr.
Director of Government Relations
International Bottled Water Association