



April 15, 2019

California State Water Resources Control Board  
P.O. Box 100  
1001 I Street, 24th floor  
Sacramento, CA 95814

Chairman Esquivel and members of the State Water Resources Control Board,

The California Bottled Water Association (CBWA)<sup>1</sup> and the International Bottled Water Association (IBWA)<sup>2</sup> appreciate the opportunity to provide these brief comments to the California State Water Resources Control Board (State Board) as it develops its water rights enforcement policies.

Our bottler members strive to be good corporate citizens, especially as it relates to their water usage, and they take pride in being responsible stewards of this precious resource. In fact, less water is used to make bottled water than any other packaged beverage (1.39 liters per liter, which includes the liter of water that is consumed). Moreover, the amount of water used for bottling water in California is less than .02 percent of the state's annual water use. And, 100 percent of bottled water is intended to be consumed.

Environmental stewardship is part of the bottled water industry's history, and protecting, maintaining, and preserving water resources for future generations is something we take very seriously. To ensure the availability of a sustainable and reliable water supply, the bottled water industry depends on the application of clearly delineated, well-established, orderly water rights enforcement policies. We envision that the State Board will develop water rights enforcement policies that are impartial to the different types of reasonable and beneficial uses exercised throughout the State of California and, at the same time, are equally applied to the various water rights holders within the State. We look forward to providing comments on effective water rights enforcement policies and, as the State Board develops its policies through this proceeding, it can expect that our members will fully comply with the policies that are adopted.

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<sup>1</sup> The California Bottled Water Association is the trade association of the bottled water industry in California. CBWA supports its member bottlers, distributors, and vendors by keeping them informed and representing them in matters of government and regulatory legislation, providing them with educational and training opportunities related to the bottled water business, creating an environment of open communications for sharing resources and information and, representing their unified voice in the future development of the bottled water industry.

<sup>2</sup> The International Bottled Water Association 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 the members and the public, by championing bottled water as an important choice for healthy hydration and lifestyle, and 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 California.

We thank you for your time and look forward to participating in this proceeding.

Sincerely,

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

Sepp Becker  
President  
California Bottled Water Association (CBWA)