

Minister of Health



Ministre de la Santé

Ottawa, Canada K1A 0K9

OCT 27 2009

Ms. Linda Stewart  
Executive Director  
Association of Local Public Health Agencies  
502-425 University Avenue  
Toronto, Ontario M5G 1T6

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Dear Ms. Stewart:

Thank you for your correspondence of August 19, 2009, concerning bottled water and enclosing a copy of the Association's resolution on regulating the bottled water industry passed at your 2009 Annual General Meeting. I regret the delay in responding.

Your taking the time to provide me with this material is appreciated. Please be assured that your correspondence has been forwarded to departmental officials for their information.

Health Canada's mission is to help Canadians to maintain and improve their health; food safety is an important component of this endeavour. From a microbiological perspective, bottled water must meet the criteria set out in sections 4 and 7 of the *Food and Drugs Act*, which prohibit the sale of food (in this case, bottled water, which is regulated as a food) that may contain harmful microorganisms or that has been produced under unsanitary conditions.

In addition, Division 12 of the *Food and Drug Regulations* specifies which microbiological criteria must be met. Bottled water is also regulated through microbiological guidelines. The microbiological standards and guidelines are similar to, or in some cases more stringent than, those of the *Canadian Guidelines for Drinking Water Quality* due to differences between bottled water and other sources of drinking water. They require different considerations, such as the environmental conditions in a sealed bottle. The Department continues to work at revising Division 12 and is considering proposing, among other changes, that *Escherichia coli* standards be added to the Regulations. The process of changing the Regulations has been initiated; a senior-level committee in Health Canada's Food Directorate is discussing the issue.

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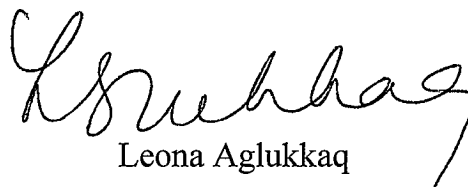
Criteria for aerobic bacteria, which are used to evaluate compliance with Good Manufacturing Practices, contribute to the safety of the product. There are also guidelines that have been in existence for more than 10 years, specifying zero tolerance for *Pseudomonas aeruginosa* or *Aeromonas hydrophila* in bottled water due to concerns regarding the potential for these organisms to grow in such products.

All bottled water sold in Canada is regulated as a food, and must comply with paragraph 4(1)(a) of the Act. As such, bottled water, as sold, must not contain any substance at a level that could pose a concern to human health. This would include any foodborne pathogens, such as *Salmonella*, parasites or viruses, that could contaminate the water source or the water at the manufacturing plant. Based on surveillance activities conducted by the Canadian Food Inspection Agency and Health Canada to date, no major concerns have arisen recently with respect to the safety of bottled water from a chemical perspective.

Since the recommendations and implications pertaining specifically to the quality of bottled water and the monitoring and enforcement of guidelines and regulations fall within the purview of the Honourable Gerry Ritz, Minister of Agriculture and Agri-Food and Minister for the Canadian Wheat Board, you have taken the correct course of action by forwarding a copy of your correspondence to him.

Thank you for writing.

Sincerely,



Leona Aglukkaq