

## Summary of Comments

### FSSAI Draft Notification April 26, 2018 to revise Minimum limits of Calcium and Magnesium content for Packaged Drinking Water

Minimum Values of 20 mg/l for Calcium and 10 mg/l for Magnesium content for Packaged Drinking Water should be deleted for the following reasons:

#### **1. World Health Organization does not recommend minimum values of any mineral in Packaged Drinking Water**

- WHO – Guidelines for Drinking Water (Fourth Edition; Year 2011) do not recommend minimum values of Ca & Mg in Packaged Drinking Water because of insufficient scientific information.
- WHO has published a study done on “*Calcium and magnesium in drinking-water: Public health significance*” in the Year 2009, which WHO has not considered in framing Drinking Water Guidelines due to insufficient scientific validity of information.

(Extract below)

they are considered foods rather than drinking-water per se. Although certain mineral waters may be useful in providing essential micronutrients, such as calcium and magnesium, these Guidelines do not make recommendations regarding minimum concentrations of essential elements because of the uncertainties surrounding mineral nutrition from drinking-water. Packaged waters with very low mineral content, such

*Attachment 1: WHO -Guidelines for Drinking-water Quality (Fourth Edition)*

#### **2. Bureau of Indian Standards (BIS): FAD 14 did not accept the proposal on minimum requirements of minerals in PDW**

- In the Year 2015, Minimum requirements of Ca & Mg in Packaged Drinking Water were discussed in detail during “FAD 14 - 23<sup>rd</sup> Meeting of Drinks and Drinking Water Sectional Committee” and “FAD 14 – 26th Meeting of Drinks and Drinking Water Sectional Committee” where the Committee, after examination, did not accept the proposal due to lack of sufficient validated scientific data.

*ATTACHMENT 2: Bureau of Indian Standard: MOM 23rd Meeting of Drinks & Drinking Water Sectional Committee, FAD 14 (Dated 20th May 2015)*

*ATTACHMENT 3 : Bureau of Indian Standards : MOM 26th Meeting of Drinks & Drinking Water Sectional Committee, FAD 14 (Dated 16th Nov 2018)*

#### **3. Impact on Taste:**

During a recent exercise, water samples in lab were prepared by using RO permeate water with added salts (as per draft notification) to study the impact on taste. After proper dissolution, water was tasted and change was observed in a few parameters.

#### **4. Impact on other Standard Food Categories with change in Requirements of Packaged Drinking Water**

- Packaged Drinking Water standard is a mandatory requirement for the water used for other food categories i.e. Carbonated Water, Caffeinated Beverage, Non-Carbonated Beverage etc. The mandatory

addition of minerals will interfere with the components of the finished beverages thereby affecting stability and palatability of products.

- As we understand that it has been agreed by the Food Authority that it is practically not possible to meet these requirements on minimum mineral levels for the Carbonated beverage, Caffeinated beverage and Non-carbonated beverage category where Packaged drinking water is a requirement for ingredient water. The minerals may interfere with the components in the finished beverages thereby affecting stability of products. This addition of minerals requires special addition in infrastructure of the CSD and NCB manufacturing process.
- Additionally and, more importantly, Added Salts, when tested for consumer acceptability made the products very unacceptable on account of Salty and harsh taste making the products unviable as compared to the current flavour that consumers are used to. Many FBOs have tried to do lab experiments in running flavours of Orange ades, lime lemon and others and all have similar impact of harsh taste not masked by flavours also.

**5. Industry has been traditionally regarding the standards as laid down by BIS as the standard for the water. Any deviation from the established practice will create confusion among the industry.**

**6. Global Regulatory Standards: No Global or Regional Standards have requirements for Minimum Values of Ca & Mg in Packaged Drinking Water**

- No Global or Country Regulations have requirements of Minimum Mineral Values for Ca & Mg for Packaged Drinking Water.
- Several Country Regulations (Czech Republic, Hungary, Poland, etc.), where WHO study was conducted, did not feel called upon to have this element in their standard and have no such requirement of Minimum values of Ca & Mg in Packaged Drinking Water.

**7. In the event of inclusion of minimum values of Ca and Mg, these values are not unlikely to act as a trade barrier, thereby hampering the effort towards harmonization.**

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