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Protect your health.

January 11, 2018

Mr. Mukhande Singh
Fountain of Truth Spring Water LLC
6420 Wilshire Blvd., Suite 900
Los Angeles, CA 90048
team@livespringwater.com

Re: EWG's Inquiry Regarding Live Water's Online and Press Statements

Dear Mr. Singh:

I am writing on behalf of the Environmental Working Group due to the recent publicity surrounding your company, Live Water. After receiving several inquiries about your product and the "raw water" movement, we have questions about the factual statements made about your product and the link from your website to EWG's Tap Water Database. As a nonprofit organization whose mission is to protect public health and the environment, EWG believes the public deserves complete and research-based answers to your representations.

EWG's Tap Water Database was developed to compile testing data that users can search to find detected contaminants in the water supplies of utilities nationwide. As an integral part of the database, EWG provides information on the health effects of tap water contaminants and points to recommendations for levels of those contaminants that, according to the best available science, protect public health. Our website also includes a water filter guide to help consumers find filtration systems certified to remove specific contaminants.

Your website links to EWG's Tap Water Database, displayed next to a statement that cities use recycled water from sewage treatment plants for tap water.¹ **What evidence do you have to support this general assertion on a state or federal basis?** Despite the implication on your website, the direct use of recycled water in the United States as a drinking water source is not common; instead, it is primarily used for irrigation or to replenish aquifers. Although we acknowledge that water discharged from sewage treatment plants can be a source of contaminants, especially in surface waters, EWG's database does not carry any information related to the direct use of recycled water. **Therefore, we ask that you remove the link to our database from your webpage, as it implies that we agree with your assertions.**

¹ <https://livespringwater.com/pages/the-difference>



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As to the science supporting Live Water and representations made on your website, harmful contaminants in drinking water can be from human activities as well as from natural sources, and self-collection of natural spring water does not alleviate health concerns about drinking water. **Have you researched whether spring water in general, or specific springs in the United States, may be contaminated with pathogenic bacteria or parasites such as giardia or cryptosporidium, and whether consumption can result in serious illness? How often do you test your own product for pathogenic bacteria – and do you publicize the results?**

Spring water can also be contaminated with substances such as arsenic, a naturally occurring mineral that can cause cancer. Arsenic is commonly found in groundwater and the U.S. Geological Survey has reported that nearly 7 percent of private wells across the country have levels above the Environmental Protection Agency's legal limit.² Other naturally occurring but harmful contaminants in groundwater include metals such as hexavalent chromium and manganese, and radioactive substances such as radon and uranium. **What testing on bottled water samples from the Live Water brand has been conducted for these contaminants?**

From your website, it appears that Live Water is bottled from Opal Springs in Madras, Oregon – the same water distributed by the Deschutes Valley Water District in Oregon and the same water that utility's customers drink from the tap. Testing under the EPA's Unregulated Contaminant Monitoring Rule Program has identified unregulated contaminants – including hexavalent chromium, strontium and vanadium – in samples from this water system.³ **Have you tested for these contaminants in your finished products, and do you inform your customers that these substances contaminate the source water you utilize?**

Likewise, your implication that probiotics in Live Water are beneficial raises concerns. The detection of several types of bacteria in one sample of your water⁴ does not mean that these bacteria are beneficial. The journal article referenced on your website is limited to identifying bacteria in another sample of spring water, but not specifically in the Live Water brand of bottled water.⁵ **On what research data are you basing your assertion that the bacteria in Live Water samples are beneficial to human health? Can you point to a peer-reviewed publication in a scientific journal, or a comparable authoritative source, demonstrating these health benefits?**

² DeSimone, L.A. 2009. Quality of Water from Domestic Wells in Principal Aquifers of the United States, 1991-2004.

³ Occurrence data for the unregulated contaminant monitoring rule.

<https://www.epa.gov/dwucmr/occurrence-data-unregulated-contaminant-monitoring-rule>

⁴ EMSL Analytical. 2017. Assessment of non-pathogenic microbial growth in spring water

⁵ Nicoletti et al. 2015. Non-pathogenic microflora of a spring water with regenerative properties. Biomedical Reports. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4660603/>



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Concerns about drinking water contaminants – whether from natural sources or human activity – are a valid public health issue deserving attention from local, state and federal regulators. EWG feels strongly about educating the public with sound information to weigh the risks of contaminants in tap water. But drinking untested or untreated water is not the answer to safe drinking water. Due to the publicity surrounding Live Water, we believe it is in the public interest for you to address the concerns raised in this letter. Additionally, due to the unsupported claims surrounding your product and tap water, we again request you remove the link to EWG's Tap Water Database on your website.

We look forward to your responses and hearing more about the research and testing conducted on your product.

Sincerely,

Ken Cook, President
Environmental Working Group