Bottled Water: from source to shelf. An overview of legislative requirements and market trends Contents

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Introduction and Summary

This purpose of this report is to provide a synopsis of the legislation relating to bottled water and describe recent market trends to assist in the initial evaluation of the opportunities for diversification into production. It does not detail the minutiae of legislative prescriptions. Installation and operation of bottling plants are not examined.

There are essentially three main types of bottled water: "Natural Mineral Water", "Spring Water" and "Bottled Drinking Water". However, there are many variations of these types of water, which result from different processes and comprise different characteristics. These water types may all be used in the manufacture of soft drinks, including flavoured water. There are no specific regulations regarding the composition of soft drinks, but legislation relevant to bottled water, given below, applies.

Abstraction of water from boreholes, springs and wells for water bottling is classed as a commercial activity and requires a Licence to Abstract. If existing licensed sources are to be used for the production of bottled water, the procedure for applying for a new licence must be followed. Further information about water abstraction licences can be obtained from the Environment Agency (see Additional Sources of Information & Useful Contacts). Guidance to the production of bottled water should be sought from the Environmental Health Office (see Additional Sources of Information & Useful Contacts) of the district council pertinent to the area in which the abstraction occurs. The Environmental Health Office can give advice on the relevant legislation, grants the necessary approval to the extraction facility and ensures appropriate quality standards. Trading Standards (see Additional Sources of Information & Useful Contacts) should also be consulted about labelling and weights and measures requirements. Environmental Health and Trading Standards are both enforcement bodies and, therefore, it is important they are consulted at an early stage to ensure regulatory compliance.

The market for bottled water, of all types, is relatively young in this country. However, despite low penetration, strong growth in the market is predicted in the future. The major multiple retailers account for the greatest volume of sales but other outlets are becoming more important. Consumers are generally not aware of the differences in water types, with brand and/or price being the most important factors in determining selection. Sales of still water outstrip those of sparkling water by volume and are forecast to continue to gain ground at the expense of sparkling water in the future.

Legislation

The following legislation is identified by Leatherhead Food Research Association (1999 and 2003) as relevant to bottled water.

Bottled water, for drinking by humans, must comply with:

- The Natural Mineral Water, Spring Water and Bottled Drinking Water Regulations 1999 as amended (SI 1999 No. 1540 <u>http://www.legislation.hmso.gov.uk/si/si1999/19991540.htm</u>, SI 2003 No. 666 <u>http://www.legislation.hmso.gov.uk/si/si2003/20030666.htm</u>)
- The Water Resources Act 1991 (c. 57)
 http://www.legislation.hmso.gov.uk/acts/acts1991/Ukpga_19910057_en_1
 .htm as amended by The Environment Act 1995 (c. 25)
 http://www.legislation.hmso.gov.uk/acts/acts1995/Ukpga_19950025_en_1
 .htm
- The Private Water Supply Regulations 1991 (SI 1991 No. 2790 http://www.legislation.hmso.gov.uk/si/si1991/Uksi_19912790_en_1.htm)

and, because is it classed as a food, with:

The Food Labelling Regulations 1996 (SI 1996 No. 1499
http://www.legislation.hmso.gov.uk/si/si1996/Uksi_19961499_en_1.htm,
as amended by SI 1998 No. 1398
http://www.legislation.hmso.gov.uk/si/si1998/19981398.htm, SI 1999 No.
747 http://www.legislation.hmso.gov.uk/si/si1999/19990747.htm and SI
1999 No. 1483

http://www.legislation.hmso.gov.uk/si/si1999/19991483.htm , SI 2003 No.474 http://www.legislation.hmso.gov.uk/si/si2003/20030474.htm),

- The Food (Lot Marking) Regulations 1996 (SI 1996 No. 1502 <u>http://www.legislation.hmso.gov.uk/si/si1996/Uksi_19961502_en_1.htm</u>),
- The Food Safety Act 1990 (c. 16 <u>http://www.legislation.hmso.gov.uk/acts/acts1990/Ukpga_19900016_en_1</u>.<u>htm</u>),
- The Trade Descriptions Act 1968 and
- The Weights and Measures Act 1985

Flavoured water is classed as a soft drink, not water, and there are no specific regulations regarding the composition of soft drinks. Nonetheless they must comply with:

- The Food Labelling Regulations 1996 (SI 1996 No. 1499 http://www.legislation.hmso.gov.uk/si/si1996/Uksi_19961499_en_1.htm, as amended by SI 1998 No. 1398 http://www.legislation.hmso.gov.uk/si/si1998/19981398.htm, SI 1999 No. 747 http://www.legislation.hmso.gov.uk/si/si1999/19990747.htm and SI 1999 No. 1483 http://www.legislation.hmso.gov.uk/si/si1999/19991483.htm, SI 2003 No.474 http://www.legislation.hmso.gov.uk/si/si2003/20030474.htm),
- The Food (Lot Marking) Regulations 1996 (SI 1996 No. 1502 <u>http://www.legislation.hmso.gov.uk/si/si1996/Uksi_19961502_en_1.htm</u>),
- The Food Safety Act 1990 (c. 16 http://www.legislation.hmso.gov.uk/acts/acts1990/Ukpga_19900016_en_1
 .htm),
- The Trade Descriptions Act 1968 and
- The Weights and Measures Act 1985

Additionally, flavoured water must comply with:

• The Flavourings in Food Regulations 1992as amended (SI 1992 No. 1971 http://www.legislation.hmso.gov.uk/si/si1992/Uksi_19921971_en_1.htm,

SI 1994 No. 1486 <u>http://www.legislation.hmso.gov.uk/si/si1994/Uksi_19941486_en_1.htm</u>).

This report does not examine all the above Acts and Regulations but is restricted to those considered to be pertinent to preliminary evaluation of the opportunities for diversification.

Definitions

Natural Mineral Water

 Natural Mineral Water is a legal designation that can only be used following official recognition laid down by *The Natural Mineral Water*, *Spring Water and Bottled Drinking Water Regulations 1999 as amended* (*SI 1999 No. 1540* <u>http://www.legislation.hmso.gov.uk/si/si1999/19991540.htm</u>, *SI 2003 No.* 666 http://www.legislation.hmso.gov.uk/si/si2003/20030666.htm)

In summary, Natural Mineral Water is water which:

- is microbiologically wholesome
- originates in an underground water table or deposit
- emerges from a spring tapped at one or more natural springs or bore exits
- can clearly be distinguished from ordinary drinking water by its mineral content, trace elements or other constituents and, where appropriate, by certain effects and by its original state
- is recognised as a natural mineral water (see Recognition as Natural Mineral Water below) and
- is bottled at source (there are exceptions for sources in production before 1980)
- receives no treatment other than filtration (which does not alter the composition of the water) or carbonation or decarbonation.

The underground water table or deposit must be protected from all risk of pollution.

Recognition as "Natural Mineral Water"

Water cannot be sold as "Natural Mineral Water" unless it has achieved official recognition as such. Water from an underground water table or deposit may be recognised as Natural Mineral Water by the district council (or London borough council or the appropriate council in Scotland or Wales) in the area where the water is extracted. Applications should be made in writing Environmental Health Office (See Additional Sources of Information and Useful Contacts) and in the appropriate district council giving:

- details of geological and hydrogeological surveys (these are used to prove that the water originates from an underground source and that the source is protected from pollution)
- details of physical, chemical and physico-chemical surveys (these are required to show that the water is consistently free from harmful microbiological impurities and that the mineral content is stable within the limits of normal fluctuation). These surveys may take two years to complete prior to recognition.

Spring Water

Bottled water can only be sold as "Spring Water" if:

- it is extracted from a spring and comes from a single source
- it contains no property, element organism or substance injurious to health
- it is bottled at source (there are exceptions for sources in production before 23rd November 1996)

Spring Water is not required to undergo the lengthy recognition process required by Natural Mineral Water. Nonetheless it is required to comply with all the hygienic and compositional requirements of the legislation.

Bottled Drinking Water

Water may be sold as "Bottled Drinking Water" if:

• it is drinking water which is bottled

Drinking water means water for drinking by humans other than Natural Mineral water or Spring Water. A bottle means a closed container of any kind in which water is sold for drinking by humans or from which such water is derived. "Bottled Drinking Water" may use more than one source or use water from a public supply.

Labelling

Labelling requirements on all bottled waters, whatever the designation:

- description of the product
- the name and address of the producer
- the quantity using either the minimum system or the average system
- a lot marking indication, that allows identification of the lot to which a sales unit belongs, which must be preceded with the letter L.

Additional labelling requirements for Natural Mineral Water:

- its official registered name in type at least 1.5 times the size of other type on the label
- the source of the water, clearly stated
- declaration of the mineral analysis either in the form of a full list on the label or by providing the means to obtain, free of charge, a detailed mineral analysis from the bottler.
- the sales description: for still natural mineral water this is natural mineral water; or effervescent natural mineral water this is:

- naturally carbonated natural mineral water or
- natural mineral water fortified with gas from the spring or
- carbonated natural mineral water
- the indication 'fully de-carbonated' or partially de-carbonated', as appropriate.

Additional labelling requirements for Spring Water:

• the name of the place where the spring is exploited and the name of the spring.

Advice from Trading Standards is that a draft label should be drawn up in the first instance and sent to the local Trading Standards department. This will be checked to ensure all the requirements of the legislation are met and providing the opportunity for any alterations to be made before printing.

Water Abstraction

Groundwater sources for the bottled water industry will usually be accessed via a borehole or other works which capture the water before it reaches the ground surface. Groundwater abstractions should comply with:

- The Water Resources Act 1991 (c. 57) http://www.legislation.hmso.gov.uk/acts/acts1991/Ukpga_19910057_en_1
 .htm
- as amended by *The Environment Act 1995 (c. 25)* <u>http://www.legislation.hmso.gov.uk/acts/acts1995/Ukpga_19950025_en_1</u>
 <u>.htm</u>.

Abstraction for water bottling is classed as a commercial activity and requires an abstraction licence. Prior to the development of a new groundwater source or the use of an existing one a 'Consent' is needed. This is the first stage in the process of applying for a licence. A 'Consent' must be sought from the Environment Agency

who will assess the impact of an abstraction based on the proposed drilling location and the quantity of water required. The following information should be provided:

- A map showing the boundary of the property, with the position of the water source
- The type of source -e.g. borehole, well, shaft *etc*.
- Maximum hourly, daily and annual abstraction requirements by type of use *e.g.* agriculture, private domestic, water bottling.
- The number of hours per day.

Following satisfactory results of the impact assessment a 'Consent' will be granted. There is no charge for a 'Consent' but it is time limited – usually twelve months. At this stage, The Environment Agency require a pump test to be conducted to assess whether the quantity required is available for abstraction and that it is sustainable. Any costs associated with the pump testing are borne by the applicant. A detailed water quality analysis is also needed. This should be conducted by a firm of Public Analysts (See Additional Sources of Information and Useful Contacts). If the results of the pump test and water quality analysis are satisfactory the Environment Agency issue an invitation to apply for a Licence to Abstract.

It will be necessary to advertise the intention to apply for a licence: once in The London Gazette and once in each of two successive weeks in a newspaper local to the area in which the abstraction will occur. The Environment Agency will provide the necessary guidance about the format of advertisements. Costs associated with advertising are borne by the applicant and are usually within the region of £300 to £350.

Applications for a Licence to Abstract must be accompanied by:

- original copies of each local newspaper containing the advertisement (but not a copy of the London Gazette)
- a map showing the boundary of the property and the point(s) of abstraction
- where the application is to vary an existing licence, the original licence

Currently the cost of an application is $\pounds 110$ in the South West. It does vary in other regions.

The application and map must be made available for public inspection for at least four weeks within the area local to the abstraction. The Environment Agency has a period of up to three months in which to give its decision.

Providing there are no valid written representations within 28 days following publication of the advertisements and there is no other reason for refusal, licences will normally be issued.

Licences are currently not time-limited, but this is under review and they may be so in the future.

Annual charges payable following the issue of a Licence to Abstract are subject to a minimum of £25.00 at a rate of $\pounds 17.24/1000m^3$ (prices stated for 2003).

The Market for Bottled Water

Two market reports (Key Note 1995 and Mintel 2001) both identify that there has been strong growth in the bottled water market in recent years, predicting further increases in the future. Unless otherwise stated, the following provides a synopsis of the Mintel (2001) market report.

In 2001, the estimated total market in the UK extended to 1,550 million litres, representing more than a 115% increase from 1998. Increased volumes and strong competition have resulted in the price per litre falling from approximately 50 per litre in 1998 to 33p per litre in 2001.

The bottled water market is young in the UK and, despite the strong growth, it remains a minority market with only a third of adults using bottled water at all and only 5.5% using it every day. Women aged between 25 and 34, ABs (see Additional Information and Useful Contacts) and those living in Greater London are the consumer groups with the highest consumption. Consumption is highest amongst the

most prosperous socio-economic groups, with almost 50% of ABs drinking bottled water compared to only 30% of C2s and only 23% of Es. Consumption by all socieconomic groups, with the exception of ABs increased between 1998 and 2000.

There has not been a strong tradition of drinking bottled water in this country and despite the increase in consumption in recent years per capita consumption is amongst the lowest in Europe. The main reason for this is perceived to be the existence of a good quality mains water supply, although concern over drinking water quality is now considered to be one of the drivers for increased consumption.

Table 1 shows per capita consumption of bottled water in selected European Union countries between 1992 and 1999 and the percentage change between those two years. Italy had the highest per capita consumption in 1999 at over 145 litres per year and the UK the lowest at 15.6 litres. Consumption increased in all countries illustrated with the greatest percentage increase in the UK (nearly 216%). However, this was from a very low base. Mintel (2001) suggest that per capita consumption in the UK will increase to over 40 litres by 2005.

Table 1 Per Capita Consumption of Bottled Water (litres) in Selected European
Union Countries 1992 – 1999

	1992	1997	1999	% change
	litres per	litres per	litres per	1992-99
	capita	capita	capita	
Italy	95.9	110.9	145.4	51.6
France	74.7	95.4	123.5	65.3
Belgium	67.3	73.4	116	72.4
Germany	60.9	87.2	98.7	62.1
Switzerland	46	48.1	91.1	98
Spain	44.5	53.7	78.5	76.4
UK	7.4	12.8	15.6	210.8
European average	40.4	63.5	87.1	215.6

Source: Mintel 2001

As mentioned above, one of the drivers of increasing consumption is concern over the quality of drinking water from the mains supply. Others include:

- increased concern over health
- the convergence of European lifestyles because of membership of the European Union
- increased foreign travel

The weather has a strong influence on bottled water consumption and sales increase dramatically during hot weather driving new drinkers and impulse buyers. However, established water drinkers are now drinking bottled water all year round and are unaffected by seasonality.

A recent article in the Times (11th May 2003) indicated that the UK government plans to transfer responsibility for deciding to treat water with fluoride from water companies to strategic regional health authorities in England and Wales. This could result in fluoridation of water supplies throughout England and Wales. The driver for this is that in areas where fluoride is already added to water (Birmingham, the West Midlands, Tyneside, Northumberland and Lincolnshire) tooth decay amongst children has been reduced. However, this is a controversial issue and the Medical Research Council (2002) has reported that more information about possible health risks, including links between fluoridation and cancer, is required. It is also argued that water fluoridation is a form of "mass medication" giving people no choice but to buy bottled water if they do not agree. The leader article (Times, 11th May 2003) concludes, "If the government goes ahead with the plan, the main beneficiaries will be bottled water companies."

Until 1990, sales of sparkling water exceed those of still water by volume. However, by 2001 still water accounted for 66% of the market and sales are predicted to continue to outstrip those of sparkling water in the future, with sparkling water continuing to lose market share.

The industry is reported to estimate that around a third of all bottled water consumed is now purchased on impulse. These tend to be in smaller packs and are less price sensitive than water sold in larger packs.

The major food retailers account for the bulk of sales in this country with own brand labels accounting for approximately 59% of the total volume sold. There are, however, over 50 brands of bottled water available in this country and other outlets, like CTNs (Confectioners, Tobacconists and Newsagents), petrol forecourts, sandwich bars, health and fitness clubs, leisure centres and so on are increasing their market share. Table 2 shows volume sales and percentage change in market share through selected outlets in 1998 and 2001.

Table 2 Volume Sales, Market Share and Percentage Change of Market Share ofBottled Waters in 1999 and 2001. Selected Outlets.

	1998		2001 (est)		% change
	m litres	%	m litres	%	1998-01
Grocery multiples	384	53.3	915	59	138.3
Grocery co-ops	15	2.1	17	1.1	13.3
Independents	13	1.8	11	0.7	-15.4
Other outlets	125	17.4	229	14.8	83.2
Sub-total	537	74.6	1,172	75.6	118.2
Hotels/restaurants	112	15.6	246	15.9	119.6
Pubs/clubs	71	9.9	132	8.5	85.9
Sub-total	183	25.4	378	24.4	106.6
Total	720	100	1,550	100	115.3

Source: Mintel 2001

Sales in licensed premises (hotels, clubs, pubs and restaurants) account for approximately 25% of the market and prices for premium brands can go as high as £4.50 per bottle in restaurants.

Consumers are generally not aware of the differences between "Natural Mineral Water", "Spring Water" and "Bottled Drinking Water" (Table Water). Brand and/or

price are the most important factors determining selection. However, for producers, the differences are important since the standards required for "Natural Mineral Water" are more rigorous than those for "Spring Water", which in turn are more rigorous than those for "Bottled Drinking Water".

In summary, the market for bottled water, although young and with low penetration, is predicted to continue to grow strongly in the future. Whilst the major multiple retailers account for the bulk of sales in this country, other outlets are gaining ground and locally-produced water, for example, marketed in a strong tourism area through carefully selected outlets, could take advantage of this phenomenon. The lack of awareness of the differences between bottled water types amongst consumers suggests that producers should examine the cost implications of meeting the relevant criteria to identify the most appropriate product for the market.

Additional Sources of Information and Useful Contacts

The following are sources of further information and useful contacts, which includes both private and public sector organisations. In the case of commercial companies, inclusion does not represent a recommendation.

British Soft Drinks Association

20/22 Stukeley Street, London, WC2B 5LR. Contact: Bob Hargitt, Tel: 020 7430 0356, Fax: 020 7831 6014, Email: <u>bsda@britishsoftdrinks.com</u>, Website: <u>www.britishsoftdrinks.com</u>

The BSDA produce the "Guide to Good Bottled Water Standards". Price: £69.00 from the BSDA.

Demographic Classifications

A brief overview of social grade definitions can be found on the Businessballs website: <u>http://www.businessballs.com/demographicsclassifications.htm</u>

European Bottled Watercooler Association

79 Boulevard Saint-Michel, B-1040, Brussels, Belgium. Tel: +32 2 743 40 59, Fax: +32 2 732 51 02, Email: *ebwa@agep.org*, Website: *http://www.ebwa.org* This organisation represents 300 companies involved in the bottled watercooler market.

Highland Spring

Stirling St Blackford, Perthshire, PH4 1QA. Tel: 01764 660500, Website: <u>www.highland-spring.com</u> General information about water.

International Bottled Water Association

1700 Diagonal Road, Suite 650, Alexandria, VA 22314, USA. Tel: (703) 683-5213, Fax: (703) 683-4074, Email: *ibwainfo@bottledwater.org*, Website: *http://www.bottledwater.org*

Whilst the IBWA is ostensibly an international organisation, it is based in America and represents the bottled water industry in the USA. The website contains information relevant to the market in the USA and, therefore, is not directly relevant to the market or the legislation in this country.

Natural Mineral Water Information Service

10 Broadbent Close, 20-22 Highgate High Street, London, N6 5JW. Tel: 0181 341 0081, Website: <u>http://www.naturalmineralwater.org</u>

The NMWIS website contains useful information about "Natural Mineral Water", current legislation, comparisons of different water types, and so on. There are also links to members' websites and a list of frequently asked questions (FAQs).

Nestlé Water Institute

Website: <u>http://www.water-institute.com/uk/b-homepage.htm</u>

The Nestlé Water Institute is a centre for fundamental and applied research on bottled water. Comprehensive and informative site.

Neville and More Ltd

Units 18 & 19, Station Road Industrial Estate, Southwater, West Sussex, RH13 9UD. Tel: 01403 732290, Fax: 01403 733507, Email: <u>info@nevilleandmoore.com</u>, Website: <u>http://www.nevillem.com</u>

Neville and Moore Ltd are a packaging company, selling bottles and other containers.

Tarka Springs Ltd

Little Comfort Farm, Langtree, Torrington, Devon, EX38 8NY. Tel: 01805 601380, Email: *info@tarkasprings.co.uk* Website: None at present Tarka Springs is a new company which has successfully launched a range of bottled waters.

Yarner Spring Water

Yarner, Bovey Tracey, Devon, TQ13 9LN. Tel: 01364 661503, Fax: 01364 661354, Email: *mail@yarner.co.uk*, Website: *http://www.yarner.co.uk* (a new website is being developed). Yarner Spring Water is produced in Devon. The website provides information about their water products, amongst other things.

There are many other internet sources of information about bottled water. For example, using the Google search engine (<u>www.google.co.uk</u>), and searching for "Spring Water", UK sites only, over 11,000 web pages are identified.

Environment Agency

Details of Environment Agency Offices throughout the country can be found on the Environment Agency website:

http://216.31.193.171/asp/1_search_results_1.asp?f_dataset=envagencyoffice&f_locat ion=All%20Location For Cornwall and Devon, contact information at the Environment Agency is given below

For Abstractions in Cornwall:

The Environment Agency, Water Resources Department, Sir John Moore House, Victoria Square, Bodmin, Cornwall, PL31 1EB. Contact: Len Careless, Tel: 01208 78301 extn 5059

For Abstractions in Devon:

The Environment Agency, Water Resources Department, Exminster House, Miller Way, Exminster, Devon, EX6 8AS. Contact: Terry Folland ,Tel: 01392 316069 Or Nick Prall, Tel: 01392 316070

Environmental Health Departments

Environmental Health Departments may be contacted at the local authority relevant to the area where the abstraction occurs.

Details of all local authorities in the country can be found on the UK Online website: <u>http://www.ukonline.gov.uk/QuickFind/AZLocalGovernment/fs/en?CONTENT_ID=</u>1001101&chk=tzXGgX

For Cornwall and Devon, contact information is given below

Caradon District Council, Luxstowe House, Liskeard, Cornwall, PL14 3DZ. Tel: 01579 341000

Carrick District Council, Carrick House, Pydar Street, Truro, Cornwall, TR1 1EB. Tel: 01872 224400

Kerrier District Council, Dolworth Ave, Camborne, Cornwall, TR14 8SX. Tel: 01209 614000

Penwith District Council, Council Offices, St Clare, Penzance, Cornwall, TR18 3QW. Tel: 01736 362341

Restormel Borough Council, Borough Council Offices, 39 Penwinnick Road, St, Austell, Cornwall, PL25 5DR. Tel: 01726 223300

North Cornwall District Council, Council Offices, Trevanion Road, Wadebridge, Cornwall, PL27 7NU. Tel: 01208 893333

Plymouth City Council, Civic Centre, Royal Parade, Plymouth, Devon, PL1 2EW. Tel: 01752 668000

East Devon District Council, Council Offices, The Knowle, Sidmouth, Devon, EX10 8HL. Tel: 013395 516551

Exeter City Council, Civic Centre, Paris Street, Exeter, Devon, EX1 1JN. Tel: 01392 277888

Mid Devon District Council, Lowman House, Lowman Green, Tiverton, Devon, EX16 4LA. Tel: 01884 243200

North Devon District Council, Civic Centre, North Walk, Barnstaple, Devon, EX31 1EA. Tel: 01271 388451

South Hams District Council, Follaton House, Plymouth Road, Totnes, Devon, TQ9 5NE. Tel: 01803 861234

Teignbridge District Council, Forde House, Brunel Road, Newton Abbot, Devon, TQ12 4XX. Tel: 01626 361101

Torbay Council, Town Hall, Castle Circus, Torquay, Devon, TQ1 3DR. Tel: 01803 201201

Torridge District Council, Riverbank House, Bideford, Devon, EX39 2QG. Tel: 01237 428700

West Devon Borough Council, Kilworthy Park, Drake Road, Tavistock, Devon, PL19 OBZ. Tel: 01822 612218

Public Analysts

The Association of Public Analysts' website provides a list of all laboratories in the country on: <u>http://www.the-apa.co.uk/Laboratories/index.html</u>

The only Pubic Analyst in Cornwall and Devon is Tickle & Reynolds, Public Analyst, 83 Heavitree Road, Exeter, EX1 2ND, Devon. Tel: 01392 272836

Trading Standards Departments

A list of all trading standards departments throughout the country can be found on http://www.tradingstandards.net/pages/lalist.htm

For Cornwall and Devon, contact information is given below

Cornwall County Council, Trading Standards Department, County Hall, Trelew Road, Truro, Cornwall, TR1 3AY. Tel: 01872 323700

Devon County Council, Department of Trading Standards & Consumer Protection, County Hall, Topsham Road, Exeter, Devon, EX2 4QD. Tel: 01392 382000 *Torbay Council*, Trading Standards, Town Hall, Castle Circus, Torquay, TQ1 3DR. Tel: 01803 201210

Plymouth City Council, Trading Standards, Civic Centre, Plymouth, Devon, PL5 2LJ. Tel: 01752 304580

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The Times. 2003. Secret Plan for fluoride in all water; Why put fluoride in water? Leader: Leave water alone. 11th May 2000