



National Spring Water Association, Inc.

FSIS Docket Room, U.S. Dept. of Agriculture
Food Safety and Inspection Service
102 Cotton Annex
312th Street, S.W.
Washington, D.C. 20250-3700

00-041N
00-041N-8
William R. Miller

23 October 2000

Re: Docket 00-041N
Docket Codex Circular Letter CL 1998/44-NMW

Dear Sir:

The National Spring Water Association, Inc., thanks the U.S. Department of Agriculture and the U.S. Food and Drug Administration for this opportunity to comment on agenda items of the upcoming Seventh Session of the Codex Committee on Natural Mineral Waters with particular reference to the Codex Document CL 1998/44-NMW.

The National Spring Water Association, Inc., supports point-by-point, with one qualifier, the position expressed in the comment letter of March 23, 2000, signed by F. Edward Scarbrough, Ph.D., U.S. Manager for Codex, Office of the Administrator, and addressed to the Secretary, Codex Alimentarius Commission, FAO, in Rome, Italy. Our qualifier is that while, for the purposes of the Codex process, we support the existing U.S. Food and Drug Administration's definition for spring water, it is our purpose to ultimately achieve a more restrictive definition, which does not allow for the use of mechanical force to extract water from an aquifer unless such water is labeled well water.

We are assuming that, in the last paragraph of Dr. Scarbrough's above-referenced letter, that the word "unacceptable" should be substituted for the word "acceptable" in the sentence that reads as follows: "Specifically drawing attention to natural mineral water in this section is inappropriate and *acceptable*" (emphasis added).

Sincerely,

William R. Miller, President
National Spring Water Association, Inc.
P.O. Drawer 668
Robbinsville, NC 28771