

Sr.No	Name and Address of the organisation / person, contact number and email	Relevant section in the draft notification on which comments are being provided	Comments / suggestions	Rationale	Remarks
1	<p>SAFE WATER NETWORK INDIA The Centrum, Room no-1, 3rd floor 369-370, Main MG Road, Sultanpur New Delhi-110030 Contact Person: Ravindra Sewak, Trustee email: rsewak@safewaternetwork.org</p>	FSSAI move to bring in water quality norms for drinking water dispensed	Since urban local bodies supply water to many crores of people, they must also comply to these standards, at least at the treatment plant	To ensure safety of public health as the municipalities treat and offer or charge for their drinking water	
2			We also suggest that proposed Drinking Water standards should also be applicable to Municipal water, commercial or non-commercial, NGOs, Home Purification units, shops serving water to their consumers/customers.	Many crore of people drink the water supplied by these authorities and hence it is all the more necessary to apply standards on these public utilities as well to protect public health	
3			Proposed standards, must also be applied to: a. Water dispensed in schools b. Water served for drinking in restaurants c. Water dispensed similarly by state government programs (whether those are with or without vending machines – Punjab, GoK, Delhi city, Bengaluru city etc. and Railways). Water quality must be same even if it is provided by commercial, non-commercial, NGO or government related activity.	They serve larger population and law should be equal even for offered or charged water for public	
4			Home purification units must also demonstrate that they can comply to these specifications on a wide variety of input water characteristics, as they claim to dispense safe and sometimes even healthy water.	Keeping in view to provide safe, clean Drinking Water, we suggest that practical and achievable standards for drinking water should be considered for the benefit of masses particularly in rural areas where there are many quality affected habitations in need of clean water.	
5		Use of word "Vending Machine"	Please define clearly what will be covered under "vending machines". Would the dispensing points without automatic dispensing not fall under this category?	All potable water should comply with similar specifications with or without the vending. If someone removes and dispenses their product (water/ any other beverage) using normal tap the same standards should apply.	
6		Request you to clarify on DEFINITION OF "VENDING MACHINE"	The process of vending does not purify the water but the process of purification is completely different. Hence use of word "vending" is confusing. Use word dispensing instead.	The purification varies depending upon the contamination in the local raw water and it varies from chlorination to UV to use of membranes such as UF, Nano or RO. Other technologies are also used such as ion exchange or desalination but dispensing through vending machines does not purify water and is only a mechanism to provide convenience to the consumers for 24x7 availability apart from each of cashless payments for the services in advance, avoiding small change transactions.	
7			Under this notification, the unpackaged Drinking Water is being considered at par with the Packaged Drinking Water, as far as the standards which are being proposed for the unpackaged Drinking Water offered or sold through water vending machines is concerned (Pt 6).	Here we wish to highlight that Potable Drinking Water standards are already available with BIS (IS 10500 – 2012 norms). Further Ministry of Drinking Water and Sanitation in their ' Uniform Drinking Water Quality Monitoring Protocol' published in Feb 2013 has also made it mandatory to carry out analysis of at least 13 basic water quality parameters viz. pH, TDS, Turbidity, Chloride, Total Alkalinity, Total Hardness, Sulphate, Iron, Arsenic, Fluoride, Nitrate, Total Coliforms and Thermotolerant Coliform or E-Coli (Extract attached).	
		Would the same standards apply for dispensing/ vending any other FSSAI approved beverage?	Most beverages (Tea/ Coffee/ Soft drinks) vending machine use water to prepare their drinks In-Situ.		

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8	SAFE WATER NETWORK INDIA The Centrum, Room no-1, 3rd floor 369-370, Main MG Road, Sultanpur New Delhi-110030 Contact Person: Ravindra Sewak, Trustee email: rsewak@safewaternetwork.org	Clause 4 specifies complying with packaged drinking water standards equivalent to IS:14543	It is recommended that a finite set of BIS: 10500: 2012 standards are applied to unpackaged drinking water that can be tested locally. Radioactive Elements α/β , Heavy Metals or pesticide testing is not available widely.	The packaged drinking water standards are more stringent as it needs to meet a longer shelf life of 9 – 12 months in order to maintain quality during prolonged transportation, supply chain and storage in retail. The attendant costs in conducting all these tests at least once every year on raw and treated water is very expensive for the poor		
9			Need to create a separate classification for unpackaged drinking water that is for public service or public utility, similar to what is dispensed by the Gram panchayat / municipality where the consumer comes to collect the water in their own vessels / cans.	It is not for commercial sale but for recovering only the operating cost of the local operation and maintenance. Urban utilities provide drinking water to a large section of society and hence these regulations should also apply to them.		
10			Need for a wider expert group consisting of stakeholders to evaluate all the suggestions/ comments. The upcoming regulation be referred to the relevant Ministry (Rural: Ministry of Drinking Water and Sanitation and Urban: MOUD), NEERI (National Environment Engineering Research Institute) and Bureau of Indian Standards (BIS) who formulate the standards etc. for their expert views	Since the large population particularly in rural area will get impacted, it should be formulated after hearing concerns/suggestions from different stakeholders		
11			Unpackaged drinking water quality norms should not be on par with packaged water regulation.	It would increase its cost and it is meant for poor who cannot afford water sold in packaged drinking water @ Rs 20 for 1 litre while the purified water dispensed in the rural / urban treatment kiosks ranges between Rs 2 – 10 for 20 litre. Such a low price is for improving public health and good and generally has social motive.		
12			List of tests to be limited to a finite list of tests	Please issue clear guidelines on cost of testing of the entire set of tests by the approved FSSAI laboratory for these tests. The challenges in testing the complete list of prescribed contaminants and list of laboratories that have facilities to test ALL THE PRESCRIBED TESTS.	Agencies wanting to self regulate and check the quality will be able to carry out these tests at an affordable cost. This will facilitate self regulations and testing at an affordable cost. It is also challenging to test the full range of prescribed parameters as very few labs are qualified to test all the parameters.	
13				Unpackaged drinking water needs to comply with the Water Quality norms laid out by section 5.2.1 issued by the Ministry of Drinking Water and Sanitation in their Uniform Drinking Water Quality Monitoring Protocol, which refers to BIS 10500:2012. One could possibly take water testing through FSSAI approved labs for recommended contaminant testing BIS 10500: 2012 at the time of installing the system.	This would enable the implementer to know the endemic contaminants requiring repeated testing	