



## The role of 'pure water' and bottled water manufacturers in Nigeria

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THE THEME OF this conference, "Towards the Millennium Development Goals – Action for Water and Environmental Sanitation" is timely in the light of the problem of poor availability and access to good drinking water in many countries of the world including Nigeria. "About one-fifth of the world's population lack access to safe drinking water, and about half lack adequate sanitation. About 40 percent of the world's population live in countries with moderate to high water stress. By 2025, this figure could rise to 50 percent. Yet, with the help of policy and legal reform, international cooperation, community and private sector participation, technical innovation – there are encouraging signs that the crisis could be averted"<sup>1</sup>. The connectivity between poverty, hunger, availability, affordability and access to drinking water to sustainable development is succinctly described by the goals of the millennium declaration. "The links between water, health and poverty are numerous and complex"<sup>2</sup>.

Access to safe water affects adequate sanitation which in turn drives the risk of water borne diseases especially in poor urban communities. The urban poor often spend up to 10 - 20 times more on water from vendors than piped water.

The inability of Government to consistently provide adequate water contributed to the proliferation of the so-called 'pure water' manufacture in Nigeria. The provision of drinking water that is not only safe, but tasteless, odourless and clean in appearance is top priority in any country that cares for good health, and poverty alleviation towards sustainable development.

Consumers cannot by themselves ascertain the quality of drinking water. Naturally, water that appears dirty, discoloured, smelly or with unpleasant taste will be treated with grave suspicion by consumers, thus causing them to find an alternative. However, appearance and other organoleptic properties are not all there is to Water Quality Assurance.

Regulation of packaged water is therefore a government intervention in the private sector for public good as it assures quality. This is where NAFDAC comes in by ensuring access to only safe and good quality packaged water to the public.

### The NAFDAC mandate

The National Agency for Food and Drug Administration and Control (NAFDAC), was established by Decree No 15 of 1993 (as amended), to control and regulate the manufacture, importation, exportation, distribution, advertisement, sales and use of food, drugs, cosmetics, chemicals/deter-

gents, medical devices and all drinks, including our popular pure water.

The scope of this mandate puts the responsibility of safeguarding public health on the Agency, and this touches on the life of every Nigerian.

Another Decree, which empowers the Agency to regulate and control packaged water/drinks, is the Drugs and Related Products (Registration, etc.) Decree No. 19 of 1993 as amended by Decree No 20 of 1999. This decree prohibits the manufacture, importation, exportation, distribution, advertisement and sale of all NAFDAC regulated products, unless they are registered.

Empowered by these Decrees, the Agency has developed the following regulations and guidelines to carry out its mandate. (see Appendix A for detailed guidelines for registration of packaged water)

1. Bottled Water Advertisement Regulations S. 1.17 of 1995, which prohibits the advertisement of any bottled water imported into Nigeria or locally manufactured unless the bottled water has been registered by NAFDAC.
2. Bottled Water (Labelling) Regulations S.1.8 of 1996, which stipulates that "No person shall set bottled water unless a label has been affixed on it."
3. Bottled Water (Registration) Regulations S.1.18 of 1996, which states that "Every bottled water manufactured, imported, exported, distributed, advertised and sold in Nigeria shall be registered in accordance with the provisions of these regulations."

It is necessary to note that the Agency's mandate on regulation of water and water-based drinks extends to only processed and packaged ones.

### NAFDAC's vision, mission, goal and strategies

The new management of NAFDAC has resolved that fake drugs, unwholesome water, food and other substandard regulated products must be brought to the barest minimum in the shortest possible time.

Our team believes that we are called to a mission to eradicate this evil and to achieve this, we have a clear vision, set goal and strategies.

Our **VISION** is to *safeguard public health*, while our **MISSION** is to *safeguard public health by ensuring that only the right quality products are manufactured, imported, exported, advertised, distributed, sold and used.*

Our current **GOAL** is to *eradicate fake drugs and other substandard regulated products*.

NAFDAC has evolved some strategies, aimed at eradicating fake products and creating a strong regulatory environment some of which include:

- Public enlightenment campaigns.
- Streamlining and strict enforcement of registration guidelines and modernization of our regulatory processes.
- Stopping the importation of fake drugs to Nigeria at source (countries of production).
- Beefing up of surveillance at all ports of entry.
- Mopping up what is already in circulation.
- Monitoring Good Manufacturing Practice (GMP) of local manufacturers.
- Recruiting the right calibre of professionals, staff re-orientation and training/retraining staff.
- NAFDAC has also (within the law) put in place some administrative guidelines to enable us expand and exploit our administrative potentials.

### **Steps taken by NAFDAC in ensuring effective regulation and control of water**

The first group that was sensitized through a nationwide workshop was the Producers of 'pure water', Fruit Juices and other Water Based Drinks.

The National workshop on packaged water was flagged off in Lagos on June 22nd, 2001 and subsequently similar workshops held in all the states of the Federation including federal Capital Territory Abuja. The workshops was attended by ten thousand, six hundred and thirty four (10,634) participants nationwide.

Objectives of the workshop include enlightenment and education of participants on the:

- Health implications of drinking unwholesome water.
- The standard procedure for water treatment.
- Product registration procedures/guidelines.
- Use of standard water treatment equipment.
- NAFDAC's commitment to be a listening and supportive agency (A change from it's past image as a punitive agency)

As a follow up on the workshop, consultative meetings were held with the States' Associations of packaged water procedures. Active audience participation was encouraged and this finally yielded positive results. The Agency by December 2001, had gained the confidence of packaged water producers.

In April 2002, NAFDAC furthermore conducted another interactive session with water manufacturers in the six geopolitical zones. This was aimed at assisting all those experiencing problems in registering their products.

On 6th September, 2001 letters were also written to major hotels in Nigeria urging them to collapse all used bottles and cartons of packaged (bottled) water to prevent the recycling of same by fakers.

- The new management of NAFDAC acted on feedback from stake holders and reviewed the Agency's registration procedures and guidelines in order to make registration less cumbersome.

The Agency has also intensified and sustained public enlightenment campaigns through print and electronic media (Television and Radio) so as to educate customers on the health hazards associated with unwholesome packaged water and other regulated products.

As a result of the Agency's new focus on enlightenment campaigns, education, dialogue and persuasion in addition to corrective measures effected in the Agency's procedures, NAFDAC has recorded a huge success in regulating packaged water in Nigeria. This is evident in the remarkable increase in the number of packaged water registered by the end of the year 2002. The number of packaged water registered was 134 in the year 2000, 436 in the year 2001 and 998 in the year 2002.

Public awareness is also high and information flow from stakeholders has helped a great deal in conducting surveillance, and enforcement of regulations.

NAFDAC carried out post marketing surveillance for already registered packaged water products, because the Agency is not just interested in product registration but in their continuous compliance to Good Manufacturing Practice and all other quality standards. Out of 647 packaged water samples analyzed so far, about

- 57% failed analysis due to Microbial contamination.
- 22% failed due to chemical contamination.
- 96% were poorly labelled; this is of grave concern to NAFDAC.

To correct this situation, the Agency is presently organizing training for staff and stakeholders (manufacturers) on Hazard Analysis and Critical Point (HACCP). We are hopeful that introduction of HACCP to our Quality Assurance system will improve the quality of products in the food, water and other relevant industries. The turn out of packaged water manufacturers in the zones so far trained is most encouraging.

### **Some of the achievements and gains recorded so far**

- i) The institution of a culture that promotes transparency, accountability and hard work in NAFDAC, and which abhors corruption, is our greatest achievement. It brought about a behavioural change in the staff of the Agency and is the oil that lubricated the wheel of our work to success.

Once the regulated industries were assured of the Agency's anti-corruption stance, they pledged their unalloyed support to achieving effective regulation in Nigeria. Our public enlightenment and other strategies were able to bear much fruit because Government, the

Press and the generality of Nigerians are supporting NAFDAC.

- ii. The production capacities of our local pharmaceutical industries have increased tremendously according to reports by individual manufacturers and the Pharmaceutical Manufacturers Group of Nigeria (PMGMAN).
- iii. The Agency's reforms have led to renewed confidence and increased patronage of drugs produced in Nigeria by other West African countries. This has resulted in the lifting of ban on "made in Nigeria" drugs by some West African countries.
- iv. There are cheering reports of declining number of kidney failure patients and death rates in our hospitals. We are working in concert with all Government Hospitals in Nigeria, by compiling the number of renal failure patients and deaths on monthly basis in order to establish a trend.
- v. From April 2001 till date; the Agency has carried out seventy destruction exercises of counterfeit and substandard products valued at over 6.0 billion (US\$43 million).  
1104 containers of regulated products were placed on 'Hold' at the Port Harcourt and Lagos ports, and most of the owners have absconded.
- vi. NAFDAC monitors salt iodization in Nigeria and in this regard, UNICEF rated Nigeria as the first country in Africa to achieve universal salt iodization. We have 100% compliance at manufacturer's level, 98% and 88% at distribution and household levels respectively.
- vii. Immense public awareness created by the Agency on NAFDAC's regulatory activities, especially on fake and counterfeit drugs resulted in the participation of the regulated industries, consumers and other stakeholders in the promotion of food and drug regulation in Nigeria. These achievements among many others have awakened the international consciousness that Nigeria is no longer a dumping ground for fake drugs and other substandard products.

### **The role of packaged / 'pure water' producers towards development**

Regulation and control of packaged water is not only the responsibility of NAFDAC but also that of the manufacturers, consumers and other relevant government organs. This team approach to regulation is necessary because of the dire consequences of consuming poor quality water to public health.

Consumption of contaminated or poorly produced water could result in water-borne diseases like cholera, typhoid fever, diarrhoea etc. Chemical contaminants such as lead, iron, nitrates, etc. in water also give rise to illness (e.g. liver and kidney problems) and even death. Water borne diseases resulting from contamination are treated with scarce funds thereby further impoverishing the masses and causing underdevelopment.

Pure water manufacturers form a major part of the small medium scale industries (SMIs) in Nigeria. Studies have shown that about 10-15 percent of total manufacturing output is from the SMIs and this accounts for over 40 percent of gross domestic product (GDP).

Packaged water especially the sachets (Pure water) production is a good poverty alleviation programme and should be encouraged. It is an industry that has immense potentials for job and income generation. With the number of pure water and bottled water outfits in the country (and judging by about 10,634 participants at NAFDAC water workshop) their retinue of staff should stand in the region of over fifty thousand strong workforce. This number excludes the chain of wholesalers and retailers that generate income from selling packaged water products.

The disposal of waste generated from the production and use of packaged water constitutes one aspect of environmental/health hazard that must be tackled by all stakeholders. Waste-to-wealth programmes have created great wealth for many nations. The Agency therefore suggests that the Ministry of Environment and the private sector participate in the reactivation of recycling programmes that will generate employment, boost our economy, protect the environment and promote health. Some countries that are not endowed with oil wealth recycle cellophane bags, (which presently litter our streets) into other very useful materials.

We encourage the promotion and use of biodegradable packaging materials. They are often cost-effective and enhance proper disposal, thus reducing public health risks. NAFDAC is concerned about this because, improperly disposed waste effects the health and well being of the people and negates the positive impact of our regulatory activities.

It is in recognition of these facts that NAFDAC insists **that there must be an environmentally friendly disposal instruction on the packaged water before it can be registered. This we enforce to the letter though environmental protection is not our mandate but a social responsibility.**

The packaged water industry has enormous export potentials. Nigeria's problem is not poor availability of water resources rather that of poor management of these resources. Well processed and properly packaged water can be exported to earn much needed foreign exchange. It is an embarrassment for Nigerians to import packaged water in any form. Manufacturers therefore must improve their standard as well as output to recapture the present market share taken by smuggled water/water based products.

Self regulatory measures should be put in place by manufacturers of packaged water. This way the Agency will focus better in assisting them to meet their optimal potentials in terms of product safety, quality, acceptability and marketability both locally and internationally. The result of our post marketing surveillance show that self regulation by pure water manufacturers still leave a lot to be desired.

## NAFDAC's call on packaged water producers

Good health is the fundamental right of everyone and as such, the collective responsibility of everyone to ensure and secure. Without health, operators in the water industry cannot function. Good health is a key to sustainable development and anyone who contributes to good health invariably promotes development.

The Agency therefore calls on manufacturers of packaged water to:

- Maintain full compliance with procedures and standards set by NAFDAC even after their products have been registered and certified fit for consumption.
- Train and monitor their staff to maintain approved standards.
- Organize seminars, workshops etc., and even one-to-one discussion on the issue of good manufacturing practice and Hazard Analysis and Critical Control Point (HACCP) of packaged water products.
- Encourage fellow manufacturers of water/drinks to register their products with NAFDAC because that is the only way to assure their control.
- Report manufacturers of unregistered water within their communities to NAFDAC.
- Promote proper disposal habits by users of their products.

On your part distinguished organizers and other participants at this programme, you too can support the NAFDAC mandate towards good health and sustainable development. We can only eradicate fake products through teamwork, a win-win approach on the part of NAFDAC, the regulated sector and the consumer.

Please be the champions of NAFDAC's course because we believe that you can make a difference.

## Conclusion

The main purpose of water regulation is to protect the consumer from pathogens and impurities that may be offensive or injurious to health. The intensity of treatment depends on the level of contamination of the water source. The Federal Ministry of Water Resources and others involved in providing water for use by Nigerians should realize that proper selection and protection of water sources are of prime importance in the provision of safe drinking water. Proper treatment and maintenance of distribution channels is equally important.

The Agency is working hard to ensure that the health of those who consume packaged water and that of the nation is protected. All of us present today also have the responsibility to protect ourselves from drinking contaminated water as much as possible. We all have a stake in developing the health and wealth of our dear nation; therefore join NAFDAC in safeguarding the health of the nation.

Thank you for listening and for your anticipated unalloyed cooperation.

## Footnotes

1. The Challenge of Sustainability, An Action Agenda For The Global Environment. P1.
2. Ibid. P6.

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