

# CODEx ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 9

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEx COMMITTEE ON FOOD HYGIENE

#### Fifty-first Session

Cleveland, Ohio, United States of America, 4 - 8 November 2019

#### DISCUSSION PAPER ON PRINCIPLES FOR THE SAFE USE OF WATER IN FOOD PROCESSING

*Comments of European Union, Ghana, Nicaragua, Nigeria, Senegal, Tanzania and East African Community*

#### European Union

The European Union and its MS (EUMS) would like to thank Honduras as chair and Chile, India, Denmark and the European Union as co-chairs for the development of this discussion paper.

The EUMS recognise that water can be an important source of contamination of food and therefore can agree on the launch of new work by CCFH on the safe use of water in food production.

With regard to the questions raised by the chair and co-chairs to CCFH; EUMS would like to express the following views:

- The EUMS can agree with the new work proposal for the development of Guidelines for the safe use and reuse of water in food production. It should cover food production as a whole and should not be limited to (post-harvest) food processing. The report of the Joint FAO/WHO Expert meeting entitled "Safety and Quality of Water Used in Food Production and Processing" (JEMRA report) justifies such a broad approach (need to include primary production) in particular in certain sectors such as the fresh produce one. Considering the increasing global need to reuse water and the never finalised 1999 Proposed Draft Guidance for the Hygienic Reuse of Processing Water in Food Plants, guidelines with regards to reuse of water should be included in the scope of the new work.
- The EUMS would welcome the consideration of an additional Annex on the use and reuse of water in the dairy sector.
- With regard to the structure, the EUMS can support general guidance for the safe sourcing, use and reuse of water in food production as indicated in the Discussion Paper. In line with the JEMRA report, indicating the need for a sectorial approach, sector specific annexes should be added. Since there is a need for a step by step approach based on priorities, the EUMS can support Annexes on the fresh produce and fishery sector, to be included in an initial draft. The EUMS would however like some clarification on Paragraph 17, third bullet, of the discussion paper as regards risk-based approaches, including decision trees. From the JEMRA report, the EUMS understand that these approaches should be sector specific and therefore suggest that they are included in sector specific Annexes (as referred to in Paragraph 17, second bullet).
- The EUMS can also support asking JEMRA to further develop examples of microbiological criteria for water use and reuse in specific sectors.

The EUMS suggest updating the Project Document to reflect the outcome of the discussions at CCFH51 and to create an electronic working group to start the drafting of the proposed Guidelines.

#### Ghana

**Issue:** Whether to develop principles or guidelines for the safe use and reuse of water in food production

**Position:** Ghana recommends the use of the term 'guidelines' rather than 'principles'

**Rationale:** 'Guidelines' will provide direction to action or behaviour in the sourcing, safe use and reuse of water.

**Issue:** Whether the structure as proposed by the EWG is appropriate where the guidelines will have a General guidance document for the safe sourcing, use and reuse of water in food processing and a sector-specific annex with fresh produce and fishery sectors as priority.

**Position:** Ghana supports EWG proposed structure of the draft guidelines

**Rationale:** The structure will provide for general guidelines and specific guidelines to cover specific situation of the use of water and other situations where guidelines are yet to be developed.

## Nicaragua

### (i) Comentarios generales

Nicaragua agradece a Honduras, Chile, Dinamarca, India y la Unión Europea por la elaboración del documento y por la oportunidad de presentar comentarios. Se reconoce la importancia y utilidad de desarrollar los principios, principalmente por el enfoque basado en el riesgo que se propone.

### (ii) Comentarios específicos

#### APÉNDICE I

##### Documento de proyecto

Nicaragua considera que la redacción actual del título puede inducir a confusiones sobre el alcance de los principios, por lo que sugiere realizar modificaciones, congruentes con lo indicado en el apartado del documento “propósito y ámbito de aplicación”.

##### Propuesta

{Principios/Directrices} para el uso y la reutilización inocuo del agua y su reutilización a lo largo de la cadena alimentaria en la elaboración de alimentos

### 3. Principales cuestiones que se deben tratar

Nicaragua solicita que en la primera parte del documento se incluyan definiciones que faciliten la interpretación de los principios por ejemplo: uso, reutilización, calidad, entre otros.

### 6. Identificación de la disponibilidad de expertos consejeros científicos en caso de necesidad

Además de los criterios microbiológicos, se sugiere considerar criterios físico-químicos para determinar la calidad del agua.

## Nigeria

**Issue:** Whether to develop principles or guidelines for the safe use and reuse of water in food production

**Position:** Nigeria recommends the development of ‘guidelines’ rather than ‘principles’

**Rationale:** “Guidelines” will provide direction to action or behaviour in the sourcing, safe use and reuse of water.

**Issue:** Whether the structure as proposed by the EWG is appropriate where the guidelines will have a general guidance document for the safe sourcing, use and reuse of water in food processing, and a sector-specific annexe with fresh produce and fishery sectors as priority.

**Position:** Nigeria supports the new work by the EWG

## Senegal

### Commentaire général

Le Sénégal appuie l'élaboration de directives pour une utilisation sans danger et la réutilisation de l'eau dans la production alimentaire. L'eau est un produit essentiel dans la production et la transformation des aliments. L'utilisation judicieuse d'une eau salubre et de qualité est essentielle pour assurer la santé publique et la durabilité de la production alimentaire. Il est donc important que des lignes directrices soient élaborées pour couvrir son choix judicieux en matière d'approvisionnement, d'utilisation et de réutilisation dans la production alimentaire. Le Sénégal soutient en outre l'utilisation d'approches fondées sur les risques et l'évaluation de l'adéquation de l'eau aux fins telles que le système d'aide à la décision. En outre, le Sénégal soutient les demandes adressées à la JEMRA d'élaborer des exemples de critères microbiologiques pour l'approvisionnement en eau, son utilisation et sa réutilisation dans la transformation des aliments.

**Question :** Faut-il élaborer des principes ou des directives pour une utilisation et une réutilisation sans danger de l'eau dans la production alimentaire?

**Position :** Le Sénégal recommande l'utilisation du terme «directives» plutôt que «principes»

**Justification :** Les «lignes directrices» orienteront l'action ou le comportement en matière d'approvisionnement, d'utilisation sans danger et de réutilisation de l'eau.

**Question :** Si la structure proposée par le groupe de travail électronique est appropriée là où les lignes directrices auront un document d'orientation générale pour la sécurité de l'approvisionnement, de l'utilisation et de la réutilisation de l'eau dans la transformation des aliments et une annexe spécifique au secteur avec les secteurs des produits frais et de la pêche.

**Position :** Le Sénégal soutient la structure proposée par le groupe de travail électronique pour le projet de lignes directrices

**Justification :** La structure fournira des directives générales et des directives spécifiques pour couvrir des situations spécifiques d'utilisation de l'eau et d'autres situations dans lesquelles des directives n'ont pas encore été développées.

#### Tanzania

The members reviewed the proposed draft and commented as below:-

- United republic of Tanzania supports the new work proposal
- Para 16: United republic of Tanzania proposes the use of the term “Guidelines” instead of “Principles” so that the document is not too prescriptive
- Para 17: United republic of Tanzania supports the development of Sector Specific Annexes of the General Guidelines for the safe sourcing, use and reuse of water in food processing
- United republic of Tanzania supports the Risk-based approaches and assessment of the fitness of the water for the purpose intended

United republic of Tanzania is proposing the paper should serve as a “Guidelines” instead of “Principles”

#### East African Community

##### **GENERAL COMMENT**

East Africa Community (EAC) supports the new work proposal

##### **SPECIFIC COMMENTS**

**Para 16:** East Africa Community (EAC) proposes the use of the term “Guidelines” instead of “Principles” so that the document is not too prescriptive.

**Para 17:** East Africa Community (EAC) supports the development of Sector Specific Annexes of the General Guidelines to ensure safe sourcing, use and reuse of water in food processing.

East Africa Community (EAC) supports the Risk-based approaches and assessment of the fitness of the water for the purpose intended.