Draft Guidelines for the Safe Use and Reuse of Water in Food Production and Processing (Annexes on water re-use in fish and fishery products (renamed from Fishery products) and on the production of milk and milk products (renamed from Dairy Products))

Comments of the FAO/WHO

The FAO and WHO appreciates the work done by the EWG Chair and Co-Chairs, and also the comments and discussions with the Members. The below options were provided for Members to:

1. Consider replace paragraph 34 with the following text:

When assessing the risk to fish and fishery products, water that results in the lowest possible risk at any stage should be used.

The DTs provide examples of how the use of water at various stages of production and processing impacts on food safety risks to fish and fishery products.

- Figure 2 Food safety risk based on water use in aquaculture production.
- Figure 3 Food safety risk based on water use in the onboard processing of freshwater fishery products.
- Figure 4 Food safety risk based on water use in the onboard processing of marine or estuarine fishery products.
- Figure 5 Food safety risk based on water use and onshore processing of fishery products.

2. Consider replace/add the below figure 2 after paragraph 37, figure 3 after paragraph 40, figure 3 after paragraph 43, and figure 4 after paragraph 44.
Figure 2 Food safety risk based on water use in aquaculture production.

1) Is the water used in fish production in a closed system, with ongoing water exchange or an open system?

- Closed system
  - 2) Is there sewage or human excreta nearby?\(^a\)
  - Yes
    - 4) Can rainwater run-off from the land that may contain faecal enter the pond?\(^c\)
      - Yes
        - 5) Can animal and/or human faeces enter the pond?\(^b,c,d\)
          - No
            - Low risk
          - Yes
            - High risk*
    - No
      - No
        - Low risk
  - No
    - 3) Can animal and/or human faeces enter the pond?\(^b,c,d\)
      - No
        - Low risk
      - Yes
        - High risk*

*Actual risk depends on the degree of contamination.

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b: Section 6 of the Codex Code of Practice for fish and Fishery products on aquaculture products
Figure 3: Food safety risk based on water use in the onboard processing of freshwater fishery products.

1) Do you degut the fish on-board?
   - No
   - Yes
     2) Do you wash the cavity with water?
        - Yes
        - No
          6) Is potable water used for cavity-washing?
             - No
             - Yes
                Medium to high risk depend on the source of water.
  - Low risk

3) Do you store the fish in water?
   - No
   - Yes
     4) Is potable water used for storage?
        - No
        - Yes
           Medium to high risk depend on the source of water.
  - Low risk

5) Ice made from potable water used for
   - No
   - Yes
      Medium to high risk depend on the source of water.
  - Low risk
Figure 4 Food safety risk based on water use in the onboard processing of marine or estuarine fishery products.

- **1) Do you degut the fish on-board?**
  - Yes
    - 2) Do you wash the cavity with water?
      - Yes
        - 5) Ice made from seawater* used for storage?
          - Yes
            - Low to high risk
          - No
            - Low risk if portable water; Medium to high risk depend on the source of water.
      - No
        - Low risk if portable water; Medium to high risk depend on the source of water.
  - No

- **3) Do you store the fish in water?**
  - Yes
    - 4) Is seawater* used for storage?
      - Yes
        - Low to high risk
      - No
        - Low risk if portable water; Medium to high risk depend on the source of water.
    - N/A
  - No

* When seawater is used, the risk depends on the origin of seawater, e.g. the seawater from high seas has lower risk compared to seawater from coastline.
Figure 5 Food safety risk based on water use and onshore processing of fishery products.

1) Do you degut the fish?  
   - No  
   - Yes

2) Do you wash the cavity with potable water?  
   - No
   - Yes

3) Do you transport the fish on ice?  
   - No  
   - Yes

4) Is potable water used for the ice?  
   - No
   - Yes

- High risk
- Low to high risk depend on the source of water.

- Low risk
- Low to high risk depend on the source of water.

- Low risk