codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

JOINT OFFICE: Viale delle Terme di Caracalla 00100 ROME Tel: 39 06 57051 www.codexalimentarius.net Email: codex@fao.org Facsimile: 39 06 5705 4593

Agenda Item 3

CX/NMW 00/3
August 2000

E

JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON NATURAL MINERAL WATER
Seventh Session
Fribourg, Switzerland, 30 October – 1 November 2000

Comments at Step 3 of the Procedure on the Proposed Draft General Standard for Packaged (Bottled) Waters Other Than Natural Mineral Waters (Circular Letter 1998/44-NMW)

Governments and international organizations:

Australia, Brazil, Canada, Cuba, Denmark, Japan, Singapore, Spain, Thailand, United States of America

International Soft Drink Council (ISDC), Groupement International des Sources d'Eaux Minérales Naturelles et des Eaux de Source (UNESEM-GISEMES)

General Comments

Australia

Australia supports:

- the development of the standard as an important step in ensuring the safety and identity of these products in international trade;
- the sub-classification of packaged waters according to waters defined by origin and prepared waters;
- the second definition of spring waters; and
- the definition of prepared waters.

Canada

At the sixth session of the Codex Committee on Natural Mineral Waters in November 1998, the Committee endorsed a new structure and a new approach for the elaboration of the *Proposed Draft Standard for Packaged Waters Other Than Natural Mineral Waters* (the Standard). The structure and approach were proposed to facilitate discussion and elicit commonalities rather than differences. Although discussions were initiated, progress was limited as none of the delegations had adequate time to fully prepare for this approach. Since November 1998, and in preparation for submission of comments in response to Circular Letter 1998/44-NMW, Canada has carried out an extensive review of the proposed draft standard and consulted with a number of countries and bottled water associations on its provisions. Canada wishes to share the results of its deliberations.

You will find attached a document titled 'CANADIAN COMMENTS FOR THE SEVENTH SESSION CODEX COMMITTEE ON NATURAL MINERAL WATERS (CCNMW) – PROPOSED DRAFT GENERAL STANDARD FOR PACKAGED (BOTTLED) WATERS OTHER THAN NATURAL MINERAL WATERS'.

The concepts outlined in this document are designed to elicit discussion and prepare the ground for the next session of the Committee. The proposed text is heavily annotated to clearly explain the basis of the underlying assumptions.

Canada is hopeful that its efforts will result in bringing about a positive outcome to the CCNMW deliberations by achieving a greater degree of agreement on the proposed draft standard.

Cuba

The word 'bottled' should be deleted from the title as waters may be marketed in containers other than bottles. This comment also applies to the rest of the proposed draft.

Denmark

Denmark appreciates the work done on this difficult subject. It seems that there are a variety of bottled water on the market world-wide. This makes it very difficult to take all types of water into consideration and at the same time to limit the number of various types of water.

From a consumer point of view it will be very difficult to distinguish the various types of water from one another. There seems to be no easy solution to this problem. However, it should be kept in mind that transparency is of importance and that the differences in the categories should be understandable to the consumers.

In the EU, all bottled waters except natural mineral water are covered by the EU drinking water directive entering into force in November 2000. In accordance with this directive all bottled water, except natural mineral water, will have to comply with the maximum limits set for chemical substances in the EU drinking water directive.

Japan

Supposing that the definition on mineral water is included, Japan proposes that the member countries begin the drafting of the Standard for Bottled/Packaged Drinking Waters based on the working paper which was presented in the Codex Committee by Canada in June 1999. The work paper is well

defined in that it takes into account the various situations of many countries so that the member countries can reach a consensus.

Japan understands that the work paper is still informal. Also, Japan assumes that Canada will distribute the revised work paper through Codex Contact Points prior to the next session. Having said that, Japan would like to use this opportunity to make technical comments on the work paper since it is important to facilitate the discussion on this issue.

Comments on the Canadian Work Paper:

Japan considers it is unnecessary to distinguish spring water, including well water and artesian water, and mineral water with the total dissolved solids, since the TDS level is related to geological conditions. Instead, Japan proposes to categorise spring water, well water, artesian well water, and mineral water as Ground Waters defined by origin, and allow each country to name its products whatever appropriate.

Japan assumes that the Canadian intention to distinguish with the TDS level should be mainly consideration on tolerance of chemical substances in order to protect consumers' health. However, if the TDS of all packaged waters shall appear on the label, the label provides consumers with necessary information, such as an expected amount of chemical substances included in a product.

Singapore

Singapore would like to request that the Committee takes into account the unique situations of various producing countries while drafting the standard, in particular those countries which have been traditionally producing such packaged (bottled) waters.

USA

We suggest that the terminology used in the General Standard for Bottled/Packaged Water conform with the terminology used the Codex of Hygienic Practice for Bottled/Packaged Drinking Waters (other than Natural Mineral Waters). The General Standard must also consistently use the same terminology throughout the document to avoid confusion.

International Soft Drink Council

The International Soft Drink Council (ISDC) is an NGO representing the interests of the international soft drink industry. ISDC is pleased to submit the following comments on the proposed draft General Standard for Packaged (Bottled) Waters Other Than Natural Mineral Waters at Step 3 (See Appendix II of ALINORM 99/20). Many of our members have products in international trade that fall within the scope of this standard, therefore, we have a keen interest in participating in the development and adoption of this international standard to make certain that unnecessary barriers to trade do not hinder the marketing of existing bottled water products. We are also very much interested in making certain that future product development is provided for in this standard.

In an effort to develop an international standard that meets the needs and requirements of the entire worldwide bottled water producers, we have the following comments on the Step 3 standard.

UNESEM-GISEMES

The Committee has proposed simplifying the classification of packaged waters and establishing definitions which are sufficiently flexible and precise to accommodate cultural habits and sufficiently clear to enable the consumer to easily distinguish between the different categories of waters.

The proposed draft contains 2 main categories:

A) Waters defined by origin: ground waters and surface waters.

B) Prepared waters.

This classification responds to the Committee's recommendations and has the advantage of being consistent with the draft Code of Hygienic Practice for Bottled/Packaged Drinking Waters (other than Natural Mineral Waters) with regard to ground waters and surface waters.

ANNOTATED TEXT OF THE PROPOSED DRAFT GENERAL STANDARD FOR PACKAGED (BOTTLED) WATERS OTHER THAN NATURAL MINERAL WATERS

1. SCOPE

This standard applies to all waters other than natural mineral waters as defined in CODEX STAN 108-1981 (Rev. 1-1997), that are filled into containers and are suitable for human consumption.

Canada

1. SCOPE

This Standard applies to waters other than «natural mineral waters» defined in Codex Revised Standard 108-1981 (Rev 1-1997), that are ***[prepackaged]*****)* *and are suitable for human consumption.*

Canada suggests adding, "prepackaged" because this term is already defined in the Codex Standard for Labelling of Prepackaged Foods. This term also indicates explicitly that the standard does not apply to the sale of waters intended for human consumption obtained through bulk vending distributors where the consumer fills his own container, as is the practice in many areas of North America.

*) As defined in Codex General Standard for the Labelling of Prepackaged Foods: "prepackaged foods to be offered as such to consumer or for catering purposes".

2. DESCRIPTION

2.1 PACKAGED WATERS

Packaged waters, other than natural mineral waters, are waters for human consumption and may contain minerals, naturally occurring or intentionally added; may contain carbon dioxide, naturally occurring or intentionally added; but shall not contain added sugars, sweeteners, flavourings or other foods.

Brazil

Substitute the sentences: '...may contain minerals, naturally occurring...' **for** '...may contain minerals of the origin water or added intentionally...' **and** '...may contain carbon dioxide, naturally occurring...' **for** 'carbon dioxide of nutritious pattern...'

Canada

2. DESCRIPTION

2.1 PACKAGED WATERS

Packaged waters, other than natural mineral waters, are waters for human consumption and may contain minerals, naturally occurring or intentionally added; may contain carbon dioxide, naturally occurring or intentionally added; but shall not contain ~~***added***~~ *sugars, sweeteners, flavourings or other foods.*

Canada suggests deleting "added" because this term is not required.

DESCRIPTION OF THE SITUATION:

Based on the Canadian approach endorsed at the 6th session of the Committee, packaged waters other than natural mineral waters can be classified in either one of two main categories: as "waters defined by origin" or as "prepared waters". The first category can be readily recognised by the consumer based on the name of the product related to a specific unique environmental source and resource (e.g. glacier water,

spring water, etc.) whereas the name for a prepared water can be related to either a specific characteristic of the quality of the final products (e.g. demineralised water meaning water with very low mineral content*), a particular treatment applied to the water before packaging (e.g. distilled water meaning demineralised in the sense that the mineral content has been reduced) or finally an intended use of the product (e.g. drinking water); however, in all cases the names of the prepared waters never relate to the origin of the water.

The Committee had begun the development of definitions of these two broad categories of packaged waters; unfortunately, the limit in time and the lack of appropriate preparation only permitted the development of the general definition for prepared waters.

In relation to waters defined by origin, the Committee agreed that these waters could be differentiated into two subcategories depending on the type of resource from which the water was collected: on one hand ground waters (defined by origin) and on the other hand surface waters (defined by origin). Waters defined by origin can only be drawn from a particular environmental resource**) and never from a public community drinking water supply; however, prepared waters can originate from all types of resources (e.g. underground or surface waters or public community drinking water supply, etc.).

The Canadian approach described above is a hierarchy that begins by defining of broader general categories of waters working towards the more specific subcategories. Unfortunately, the fully developed Canadian approach could not be explained and discussed by the Committee during the last session in November 1998 due to lack of time and preparation. Since November 1998, Canada has given serious consideration to the completion of the proposed standard and prepared a discussion document that was circulated to some member countries in order to facilitate discussions in parallel to the official process for the development of Codex standard.

To the initial hierarchy, a strategy was lacking to permit the easy identification and grouping of the commonalities between the different national traditions for the classification of waters, names of the products and definitions of these names and the irreconcilable aspects of these traditions while permitting that these latter differences could co-exist and evolve.

The strategy is thus to first define under Section 2***) (Description) a general classification canvas based on commonalities on which consensus can be developed and secondly, under Section 6.1 (Name of The Product), to permit co-existence of different names depending on regional, cultural and traditional preferences and consumer perceptions in the various countries. Therefore, none of the labelling provisions or specific product names would be specified in other Sections than Section 6.1 in order to avoid premature breakdown in discussions.

Thus, Sections 2 and 6.1 constitute together the cornerstone of the Canadian approach intended to illicit commonalities (Section 2 and related references to Section 3) between various national criteria and legitimate traditions corresponding to particular national or regional consumer expectations. The success of the project is dependent on efforts to achieve consensus under Section 2 and on openness and flexibility required to develop Section 6.1. This approach completes the hierarchy scheme presented in Bern in 1998.

*) In the Indo-European language, the same word (e.g. demineralised) can relate to both the quality of the water and the treatment applied to the water.
**) Except in cases of misrepresentation of the product when sold.
***) Supported by references to Section 3 (Essential Composition and Quality Factors) and Section 4 (Hygiene).

Cuba

The descriptions of the waters take into account criteria expressed previously by our country. However, we feel some comments should be made in the following.

Denmark

According to the proposed definition, the waters may contain minerals, naturally occurring or intentionally added; may contain carbon dioxide naturally occurring or intentionally added etc. We find that bottled waters should be water with no minerals added.

In case this is not accepted, concentrations of minerals – natural and added – should not exceed the values in the WHO Guidelines for Drinking Water Quality. Only minerals for which a Nutrition Reference Value (NRV) has been established in the Codex Guidelines on Nutrition Labelling may be added. The

maximum content of a mineral (natural + added) must not exceed the maximum value stipulated in the WHO Guidelines for Drinking Water Quality.

As minerals in many cases are regarded as technological food additive, the technological justification and need for addition of minerals should be described. Addition of minerals to water can have several purposes: to change the taste or to adjust the hardness of the water. Addition of salt to improve the taste turns the water into a soft-drink. Soft-drinks should not be considered as bottled waters. The addition of minerals to adjust the hardness of the water would be a use of the minerals falling under the use of the definition of food-additive, and such minerals should be added to the General Standard for Food Additives.

According to the Codex General Principles for the Addition of Essential Nutrients to Foods (CAC/GL 09-1987) paragraph 3.8:

Addition of essential nutrients to foods should not be used to mislead or deceive the consumer as to the nutritional merit of the food.

This should also be taken into consideration if minerals are allowed added to packaged waters.

2.1.1 [Waters Defined by Origin]
[text to be developed if necessary]

Australia

Australia suggests the following definition: *Waters defined by origin are waters that are collected and packaged in a manner that retains those physical properties; composition and quality features that characterise the water originating from the geographical feature associated with the named origin or source.*

Brazil

It is considered that it is not necessary to develop an explanatory text for the item.

Canada

Canada proposes to define “waters defined by origin” through the identification of their common characteristics that are based on consumer expectations as explained in the next text box.

[«*Waters defined by origin*» *defined under the present standard share the following characteristics:*

(a) are waters that originally come only from a unique environmental resource (such as an aquifer, a glacier, etc.) situated at a unique geographical location and are collected at one or many collection points originating from the same water bearing formation but without passing through a community water system;

(b) are obtained directly from an environmental resource for which all possible precautions have been taken within the vulnerability perimeters to avoid any pollution of, or external influence on, the chemical, microbiological and physical qualities of water at origin;

(c) are collected under conditions which guarantee the original microbiological purity and essential elements of their chemical make-up at origin;

(d) except in situations described under section 3.1.1.2, are already, naturally and constantly fit for human consumption at their source in accordance with Sections 3.2.1 and 4.2 and are kept in that state with particular hygienic precautions until and while packaging in accordance with provisions of sections 3, 4 and 5;

(e) are not subject to any modification or treatment other than those permitted under Section 3.1.1]

Canada believes that the consumers interested in buying a bottled water, labelled in such a manner as to declare the type of environmental resource where the water originates, share the following expectations:

- the water comes only and entirely from the declared resource;
- the bottled water has the same basic composition that the one at the source where it was collected; thus, the consumer could even go to the source and confirm that the bottled water originates from this source;
- the water at the source is as safe as that in the bottle.

Provisions outlined under section 2.1.1 above meet these expectations as follows:

- paragraph (a) satisfies expectation 1.;
- paragraphs (c) and (e) satisfy expectation 2.;
- paragraphs (b), (c) and (d) satisfy expectation 3.

Paragraph (a) implies that a "water defined by origin" cannot result from the mixture of waters from two different resources (i.e. a spring water with a glacier water). This paragraph also stipulates that the collection of the water can be accomplished through use of one or many bore holes or collection points.

Paragraphs (b), (c) and (d) are the most important. A water that is microbiologically pure and thus fit for human consumption at the source implies that it is protected from all external influences, of both natural and anthropogenic origins. Hence, provisions (b), (c) and (d) are scientifically interdependent.

Denmark

Denmark propose that waters defined by origin should be of a quality and purity that makes it unnecessary to threat these waters further. Therefore, waters defined by origin should not be treated except for separation of unstable elements, such as iron and sulphur compounds, by filtration or decanting, possibly preceded by oxygenation.

Denmark recommends that labels on 'water defined by origin' shall give information on the place where the source is exploited.

GISEMES – UNESEM

Proposed definition of waters defined by origin:

Waters defined by origin are waters that originate from a unique environmental resource (such as an aquifer, a deposit, etc.) situated at a unique geographical location and which do not pass through a Community water supply system.

These waters are distinguished by:

1) Their direct collection from an environmental resource for which all possible precautions have been taken within the protected perimeters to avoid any pollution of, or external influence on, the chemical and physical qualities of the water defined by origin;
2) Their collection under conditions which guarantee the original microbiological purity and the chemical composition of the essential elements;
3) The fact that, in microbiological terms, they are naturally and constantly fit for human consumption at their source and that they are kept in that state by using particular hygienic precautions until and while they are packaged in sealed containers;
4) The fact that they are not subject to any modification or treatment other than those permitted.

International Soft Drink Council

We agree to remove the square brackets on 2.1.1. Otherwise, no comment since no text has been developed at this time; however, we agree with dividing the standard into the two sections **Ground Waters and Surface Waters.**

2.1.1.1 Ground Waters
[text to be developed]

Australia

Australia suggests the following definition: *Ground waters are waters obtained from subterranean water-bearing strata. Ground waters must not be under direct influence of surface water.*

Australia considers that the standard should make provision for ground waters containing >500 ppm total dissolved solid.

The standard should recognise the use of the designation 'mineral water' to describe Ground Waters.

Brazil

Include the definition: They are those extracted from confined or liberate aquifer.

Canada

Canada proposes to title this section differently because this section is not intended to define ground waters in general, which was already done as a result of the last session of the Committee on Code of Hygiene in December 1999. It is rather intended to indicate which ground waters could fall under the category of "waters defined by origin" because they would comply with provisions of section 2.1.1.

2.1.1.1 Ground Waters [Defined by Origin]
[Ground waters defined by origin are waters that come from an underground water bearing formation that is not under the direct influence of surface water and comply with provisions outlined under section 2.1.1. These waters can be taken from wells or from spring catchments facilities].

The approach proposed by Canada in this section is intended to avoid controversial and non-productive discussions. This is accomplished by avoiding the inclusion under sections 1 to 5 of this Draft Standard, particularly under section 2 – DESCRIPTION and section 3 – ESSENTIAL COMPOSITION AND QUALITY FACTORS, of designations and definitions of specific products and postpone the naming of products to section 6 – LABELLING. Section 2 and its references to section 3 are intended to include the common characteristics of products and the normal usage of names that the Committee will identify based on the different national traditions and on which the Committee will have succeeded to achieve a reasonable consensus, based on compromises offered on certain aspects.

The approach offered by Canada consist in providing countries the liberty to name products, within the limits of the guidelines outlined under section 6.1.1.3, and identify additional criteria to the ones outlined under section 2, and its references to section 3, to satisfy their respective national traditions intended to avoid fraud and misrepresentation of products. Therefore, Canada proposes to delete sections 2.1.1.1.1 to 2.1.1.1.4, 2.1.1.2.1 and 2.1.2.1 of the text from the 6th session.

Spain

The following definition of Ground Waters is proposed:

Ground Waters: Waters such as spring water, artesian water and well water originating from subsurface aquifers. Ground waters may be classified broadly as protected or unprotected water. Protected ground waters are not directly influenced by surface water or the surface environment which is why they are microbiologically healthy.

This therefore coincides with the definition included in the Code of Hygienic Practice.

GISEMES – UNESEM

Comment: it would be preferable to have a definition which is comparable to that specified in Section 2.3 "DEFINITIONS" of the DRAFT CODE OF HYGIENIC PRACTICE FOR PACKAGED DRINKING WATERS.

"Ground water – Waters such as artesian water, well water and spring water originating from subsurface aquifer areas. Ground waters may be classified as protected or unprotected water. Protected ground waters are not directly influenced by surface water or the surface environment."

2.1.1.1.1 ***Artesian water*** is water from a well tapping a confined aquifer in which the water

level stands at some height above the top of the aquifer.

Brazil

Remove the item. Justification: According to the technical definition, waters originated from artesian wells or not are reception forms and not types of water.

Canada

See comment from Canada on Section 2.1.1.1 Ground Waters last paragraph.

International Soft Drink Council

We agree with this definition.

2.1.1.1.2 ***[Spring water*** is water derived from an underground formation from which water flows naturally to the surface of the earth. Spring water shall be collected at the spring or through a bore hole tapping the underground formation feeding the spring. There shall be a natural force causing the water to flow to the surface through a natural orifice. The location of the spring shall be identifiable.
Spring water collected with the use of an external force shall be from the same underground stratum as the spring, as shown by a measurable hydraulic connection using a hydrogeologically valid method between the bore hole and the natural spring, and shall have all the physical properties, before treatment, and be of the same composition and quality, as the water that flows naturally to the surface of the earth. If spring water is collected with the use of an external force, water must continue to flow naturally to the surface of the earth through the spring's natural orifice. Bottled water plants shall demonstrate, on request, to appropriate regulatory officials, using a hydrogeologically valid method, that an appropriate hydraulic connection exists between the natural orifice of the spring and the bore hole.]

OR

[Spring water is water fit for human consumption derived from an underground formation and not from a public or private community water supply, from which water may flow naturally to the surface of the earth. Spring water may be collected at the spring or through a bore hole tapping the underground formation. There may be a natural force causing the water to flow to the surface through a natural orifice. The geographic location of the underground formation shall be identifiable. Spring water should have a total dissolved solids range of <500 ppm.
In those cases, where a natural orifice exists, but the spring water is collected through a bore hole, it shall be from the same underground stratum as the spring, as shown by having the same physical properties, before treatment, and be of having the same composition and quality as the water that flows naturally to the surface of the earth. If spring water is collected with the use of a bore hole and a natural orifice exists, water may continue to flow naturally to the surface of the earth through the spring's natural orifice.]

Australia

Australia strongly opposes the first definition of spring water proposed on the grounds that it imposes regional process norms on the product having no impact upon its final composition.

Brazil

It is chosen the first definition, for being more technical and wide.

Canada

See comment from Canada on Section 2.1.1.1 Ground Waters, last paragraph.

Cuba

The first version of the definition of 'Spring Water' is the one which should be used in our opinion.

Denmark

Denmark supports the second definition of spring water:

'Spring water is water fit for human consumption derived from an underground formation and not from a public or private community water supply, from which water may flow naturally to the surface of the earth. Spring water may be collected at the spring or through a bore hole tapping the underground formation. There may be a natural force causing the water to flow to the surface through a natural orifice. The geographic location of the underground formation shall be identifiable...'.

We can accept this definition with the exception of the text 'Spring water should have a total dissolved solids range of <500 ppm' (corresponds to water with a low mineral content). We see no reason for this requirement.

USA

'Spring Water' is a term that we feel strongly about in the U.S. Consumers in the U.S. pay a premium price for 'spring water'. Definitions in Codex Standards must always be based on science. The dictionary definition of a spring is ground water that flows naturally to the surface of the earth. There are two suggested definitions for spring water in the circular letter. The first definition for spring water is the same that was in the previous draft and is based on the hydrogeological source. Not all ground water is spring water as set forth in the second definition. The second definition is not based on science and penalizes bottlers that actually use a true spring by adding extra requirements of proving that a collection bore hole actually taps the same stratum as the water emerging from the natural orifice. According to the second definition, bottlers of ordinary well water need not demonstrate anything. It is essential that the general Codex standard not redefine hydrogeological term but remains in harmony with scientifically valid terms. The U.S. can not accept a definition for spring water that is not based on science.

GISEMES – UNESEM

Proposed definition: *Spring water is water from an underground source which may flow naturally to the surface of the earth or which may be collected through one or more bore holes under the conditions specified in Section 2.1.1.*

Well water is water from a hole bored, drilled, or otherwise constructed in the ground which taps the water of an aquifer.

Brazil

It is suggested the exclusion of this item. Justification: According to the technical definition, waters originated from artesian wells or not are reception forms and not types of water.

Canada

See comment from Canada on Section 2.1.1.1 Ground Waters, last paragraph.

International Soft Drink Council

We agree with this definition.

[2.1.1.1.4 ***Mineral wate***r]
[text to be developed if it is determined as necessary]

Brazil

Add the word Natural in the title of the item. It is considered important to maintain the item with the definition proposed in CL 1998/44 – NMW, presented on the paragraph 22 of Alinorm 99/20, or else:

Naturally Mineral Water is a water clearly distinguishable from ordinary drinking water because:

a) It is characterized by its content of certain mineral salts and their relative proportions and the presence of trace elements or of other constituents;
b) It is obtained directly from natural or drilled sources from underground water bearing strata for which all possible precautions should be taken within the protected perimeters to avoid any pollution of, or external influence on, the chemical and physical qualities of natural mineral water;
c) Of the constancy of its composition and the stability of its discharge and its temperature, due account being taken of the cycles of minor natural fluctuations;
d) It is collected under conditions which guarantee the original microbiological purity and chemical composition of essential components;
e) It is packaged close to the point of emergence of the source with particular hygienic precautions;
f) It is not subjected to any treatment other than those permitted by this standard.

Canada

See comment from Canada on Section 2.1.1.1 Ground Waters, last paragraph.

Denmark

Denmark has no objections to the proposed definition on mineral water in itself, but finds that the name and definition makes it difficult to distinguish between mineral water and natural mineral water. This might confuse and mislead the consumers.

Japan

Japan strongly recommends that the Codex Committee include the definition on Mineral Water in the Standard for bottled/packaged Drinking Waters as provided in Circular Letter 1998/44-NMW.

Mineral water is one of the typical products where production methods are affected by geological conditions. Japan considers that such features should be taken into account in the elaboration of standards, because the differences of geology are related to the differences of production methods and the names of the product. For example, in Asia, sterilization is usually applied to the production process of mineral waters in order to avoid the risk of contamination by microorganism, which is a significant difference from natural mineral waters in Europe.

Mineral water in Japan has been developing and becoming popular among consumers, because its cleanness and safety based on the production method appealed to safety-conscious consumers. If the words ‘mineral water’ were not allowed to appear on the label of bottled water products, it would be necessary to market the product with another name, which would likely confuse consumers wh have already become accustomed to the mineral waters. This would contradict the primary objective of Codex. Therefore, Japan recommends that the Committee consider the unique situation of each country in the elaboration of the standards of Bottled/Packaged Drinking Waters.

Spain

The Kingdom of Spain does not agree with the inclusion of the definition of mineral waters in the Proposed Draft General Standard for Packaged/Bottled Waters (other than Natural Mineral Waters) because this term would confuse consumers as the term ‘Mineral Water’ is very similar to that of ‘Natural Mineral Water’. It is therefore proposed that the definition of Mineral Water is not included in the text of the Standard.

Bearing in mind that the scope covers waters other than natural mineral waters, it is not considered necessary to define mineral water and this definition must therefore be deleted.

Thailand

We agree with the addition of Definition on Mineral Water in Proposed Draft General Standard for Bottled/Packaged Drinking Waters.

USA

The U.S. firmly believes that any general standard for bottled water is inadequate unless it covers all types of water. Therefore the general standard must include definitions for all types of water, including ‘mineral water’. We support the definition of ‘mineral water’ as set forth in the circular letter. This is an

issue on which we and a number of other countries have repeatedly commented. Our comments have been constantly ignored.

Providing for a definition of 'mineral water' will ensure that the general standard for bottled water will achieve the purpose of Codex food standards, i.e., to protect consumers' health and ensure fair practices in the food trade. The Codex standard for Natural Mineral Water prohibits any form of desinfection. This prohibition does not protect consumers' health. Although we recognise that some ground waters do not need desinfection, Codex should not prohibit or discourage the use of thermal treatments or antimicrobial agents such as ozone because there is potential for microbial contamination at the water source and during handling, even with the intent to use good manufacturing practices. We believe that this is a serious omission in the standard for natural mineral water. While that standard is not being revised at this time, the omission could be rectified by defining 'mineral water' in the general standard. Otherwise the Codex standard for Natural Mineral Water must be revised so that it complies with the purpose of Codex food standards.

The Codex Standard for Natural Mineral Water also prohibits the transport of natural mineral water in bulk containers. This prohibition does not ensure fair practices in the food trade. We maintain that it is not necessary to require that the product be bottled close to the source as long as the water is held in a safe and appropriate manner and remains unchanged. Some excellent sources for mineral water are located in areas where it is inappropriate to build a bottling facility. For example, some sources may be in national parks or in environmentally sensitive areas. Again, this is a significant omission in the standard for natural mineral water that could be rectified by including a definition in the General Standard for Bottled/Packaged Waters.

There are a number of U.S. Mineral water bottles that disinfect their product. In addition we know of mineral water bottlers that use bulk transport to carry the mineral water from the source to the bottling facility. These products do not fall under the Codex Standard for Natural Mineral Waters because ii is unnecessarily restrictive. Therefore, we do not believe that the Codex General Standard for bottled Waters will be adequate if it does not provide for 'mineral water'. If mineral water is not defined in the Codex General Standard for Bottled Water, then it is incumbent upon this Committee to initiate revision and broaden the scope of the Codex Standard for Natural Miner Water to include all types of mineral water.

GISEMES - UNESEM

The inclusion of a definition of mineral water in the "Proposed Draft General Standard for Packaged Waters Other Than Natural Mineral Waters" would go against the objectives of the Codex Alimentarius Commission which are to protect the health of consumers and to ensure fair practices in food trade.

The term "mineral water" is too close to the term 'natural mineral water' and the risk of confusion cannot be ignored.

The definition of "mineral water" suggested in the proposed draft standard is fundamentally different from that of "natural mineral water" in the Codex Standard for Natural Mineral Waters (CODEX STAN 108-1981, Rev. 1-1997):

- Mineral water, according to the proposed definition, would be characterised by "a total content of dissolved minerals which is recognised as being satisfactory". Desinfection treatments and bulk transport would be permitted.
- Natural mineral water, according to the Codex standard, is a water characterised by its composition (presence of minerals, trace elements, etc.) which is microbiologically pure at source. Desinfection treatments are prohibited and the water must be bottled at source.

The similarity between the two names misleads the consumer and encourages deception about the nature of the product.

Natural mineral waters have been traded internationally for many years. By contrast, mineral waters are virtually absent from international trade.

Mineral waters exist in a few national markets and the use of this name, according to a given content of dissolved minerals, is a question of cultural habits. In these markets, the national authorities will be responsible for taking the necessary steps to prevent confusion with natural mineral water while respecting consumer habits.

On the other hand, the coexistence of "mineral water" and "natural mineral water" in international trade would constitute a distortion of competition. The international natural mineral water industry is subject to very strict constraints in terms of preserving the original quality of this water, which cannot be disinfected, and transporting this water to the consumer as this must be bottled at source in the container intended for the end-buyer.

Mineral water would not be subject to identical obligations as it could be disinfected and transported in bulk in order to be packaged near to centres of consumption.

International Soft Drink Council

CL 1998/44-NMW requested comments on the need and content of a definition for 'Mineral Water'. ISDC is of the opinion that there is a definite need for a definition of 'mineral water', e.g. mineral water that is not considered natural since the only existing Codex definition for 'mineral water' is specific for 'natural mineral water'. A definition for 'natural mineral water' excludes all mineral waters in countries that permit transportation of the water prior to bottling, adding back minerals lost, carbonating the water and treatment of the water for purification purposes. Such products are already in international trade and need to be defined in a standard that seeks to cover all bottled waters.

We are in basic agreement with the definition for **'Mineral Water'** given in CL 1998/44-NMW, except we recommend that in order to be labelled as mineral water the products must contain not less than 100 ppm total dissolved solids. Otherwise, the consumer would be deceived that the product is not mineral water.

Surface Waters
[text to be developed]

Australia

Australia suggests the following definition: *Surface waters are waters obtained from sources, the body of which are in direct contact with the atmosphere.*

Brazil

They are waters defined by their origin found in the free form in the environment, above the hydrostatic level of each area, originated from a water body which is not an underground aquifer (e.g. river, lakes, dams, oceans and etc.)

Canada

2.1.1.2 Surface Waters [(Defined by Origin)]
[Surface waters defined by origin are waters that originate from an environmental source other than underground water bearing formation and that comply with provisions of section 2.1.1.]

There is a limited number of surface water resources that could comply with provisions of section 2.1.1 that outline the common characteristics of all waters defined by origin.

Cuba

If the section on 'Ground Waters' is 2.1.1.1, then the section on 'Surface Waters' must be 2.1.1.2.

Water that originates from natural sources or a Community supply network, which has been treated by deionisation, inverse osmosis or another suitable process and which does not contain added substances and complies with the requirements of the latest monograph on water of the WHO International Pharmacopoeia.

Spain

The section on surface waters, which is unnumbered in the proposed draft, should be correctly numbered. It should be Section 2.1.1.2.

The following definition is proposed for this section:

Surface waters: Waters in contact with the atmosphere, such as those of watercourses, rivers, lakes, ponds and reservoirs.

This therefore coincides with the definition included in the Code of Hygienic Practice.

Thailand

We suggest that other surface waters such as lakes, rivers, etc. should be added to surface waters.

GISEMES – UNESEM

Proposed definition: *Surface waters defined by origin are waters that originate from a given environmental resource other than an underground water bearing formation.*

These waters, such as watercourses, rivers, lakes, ponds and reservoirs, are in contact with the atmosphere.

[2.1.1.2.1 ***Glacial (Glacier) Water*** is (1) the runoff directly from the natural melting of ice of a glacier; or (2) water obtained from the melting of glacier ice at a bottled water operation.]

Canada

For the reasons outlined above (Section 2.1.1.1 Ground Waters), Canada also proposes to transfer section 2.1.1.2.1 (glacier water) to section 6.

USA

We support the adoption of a definition for glacier water. The phrase 'glacier water' conjures up images of purity. Consumers are willing to spend more for 'glacier water' or 'glacier-blend water' than for many bottled waters. Therefore, ensuring that only waters from a glacier are labelled as glacier is important for consumer protection.

International Soft Drink Council

We agree with this definition.

2.1.1 Prepared Waters

[Prepared waters are waters that have been substantially altered so that their composition is no longer characteristic of the defined origins. They have been rendered fit for human consumption or have passed through community water supply or have had the composition significantly changed.]

Brazil

Correct numbering 2.1.2.

Change the title and the beginning of the sentence for: Treated and Prepared Waters. Justification: Considering that, firstly, water needs to be treated. It is proposed to take out the brackets, maintaining the remaining of the text.

Canada

Canada proposes to replace the definition for prepared waters drafted during the 6th session by a general indication to the effect that prepared waters are bottled waters other than waters defined by origin, these latter having been already described under section 2.1.1.

Prepared waters can originate from any types of sources such as a specific environmental resource or water from a community drinking water supply.

2.1.2 Prepared Waters

[Prepared waters are waters that do not comply with all the provisions set for waters defined by origin under subsection 2.1.1.]

Denmark

Denmark suggests the following description: *Prepared waters are waters that have been substantially altered so that their composition is no longer characteristics of the origins. They have been rendered fit for human consumption.*

Denmark assumes that the expression 'fit for human consumption' means that the quality is in compliance with the WHO Guidelines for Drinking Water Quality.

Spain

There is an error in the numbering. This should be 2.1.2.

International Soft Drink Council

We recommend deletion of the first sentence in the definition. Therefore, the definition would read **'Prepared Waters'** are waters that have been rendered fit for human consumption or have been processed through community water supply or have had their composition changed.

2.1.2.1 ***[Water with added minerals or mineralised table wate*r]** is prepared water with minerals added according to the provisions in the Codex General Standard For Food Additives (CODEX STAN 192-1995, Rev.1-1997).

Brazil

Maintain the first sentence, for being clearer and more objective for the consumer.

Canada

See comment from Canada on Section 2.1.1.1 Ground Waters, last paragraph.

Denmark

We find that 'bottled waters' should be waters with no minerals added as commented under paragraph 2.1. However, if minerals are to be added, the technological justification and need for addition of minerals should be described. Addition of minerals to water could have several purposes: to change the taste or to adjust the hardness of the water. Addition of salt to improve the taste turns the water into a soft-drink. Soft-drinks should not be considered as bottled waters. The addition of minerals to adjust the hardness of the water turns the minerals into food-additives, and the minerals should be added to the general standard for food additives. The chemical names of the minerals should be informed as well as the precise argument for the use and for the concentrations used. If this category is accepted, the maximum content of a mineral (natural + added) must not exceed the maximum value stipulated in the WHO Guidelines for Drinking Water Quality.

Denmark prefers the term 'water with added minerals' to 'mineralised table water'.

Spain

It is proposed that the phrase 'or mineralised table water' be deleted from the definition of water with added minerals as the term 'mineralised' confuses the consumer. We propose the following term: "Water with added minerals is prepared water with minerals added". The phrase 'according to the provisions in the Codex General Standard For Food Additives (CODEX STAN 192-1995, Rev.1-1997)' should also be deleted.

GISEMES – UNESEM

The term "mineralised water" is likely to mislead the consumer. This term should be deleted from the standard and the national authorities should be responsible for authorising similar terms while ensuring that consumers are not deceived.

International Soft Drink Council

We recommend deletion of the term 'water with added minerals' since that phrase describes a process and is not the name of a product. Therefore we recommend acceptance of the term 'mineralised

water' or 'mineralised table water' since the term mineralised is well understood by consumers and is easily translated into other languages such as French and Spanish. We also recommend removal of the square brackets.

3. ESSENTIAL COMPOSITION AND QUALITY FACTORS
3.1 TREATMENT AND HANDLING
3.1.1. ***Collection of ground waters:*** The conditions in which ground waters such as artesian, spring and well water are collected must not modify the physical properties, composition or quality of the water prior to the treatments.

Brazil

Remove from the text the expression '...such as artesian, spring and well water...'. Justification: to exist coherence with the proposal of suppression of the referring items of artesian water and of well.

Canada

Canada proposed to delete section 3.1.1 because this provision is already included under paragraph (c) of the new text for section 2.1.1.

GISEMES – UNESEM

To be deleted. This point duplicates the Code of Hygiene.

3.1.2 ***Transportation:*** Transportation of water from extraction or collection points to bottling facilities, if necessary, shall be conducted in a way that does not have any significant effect on the safety and the characteristic composition of the transported water. Relevant provisions of the [Draft] Code of Hygienic Practice for the Transport of Foodstuffs in Bulk and Semi-Packed Foodstuffs and [Draft] Code of Hygienic Practice for Packaged (Bottled) Drinking Waters (Other Than Natural Mineral Waters)[1] apply.

Canada

It is suggested to also delete section 3.1.2 because this provision already exists under the Code of Hygiene.

GISEMES – UNESEM

To be deleted. This point duplicates the Code of Hygiene.

3.1.3 ***Forms of treatment:*** Safe and suitable chemical, physical, thermal, and anti-microbial treatments are permitted. These treatments can be used singly or in combination as multiple barriers.
Any anti-microbial treatments applied to waters defined by origin (Section 2.1.1) shall not significantly alter the composition of the water in so far as this relates to the characteristics of its origin.
For ground water, protected from external influences as defined in the [Draft] Code of Hygienic Practice for Packaged (Bottled) Drinking Waters (Other than Natural Mineral Waters), the need for treatment, the type and degree, are defined in accordance with Section 5 (5.1) of the [Draft] Code.

Canada

Canada proposes to replace sections 3.1.3 and 3.2 by a new section 3.1 that will cover modifications and treatments, including antimicrobial treatments, as permitted depending on whether the bottled water is represented as a water defined by origin or a prepared water.

[1] Being developed by the Codex Committee on Food Hygiene.

[*3.1 MODIFICATIONS AND HANDLING*]
[*3.1.1 Modifications to the physical and chemical characteristics of the waters defined by origin.*
Waters defined by origin must not, prior to packaging, be modified or subjected to treatments other than those described in subsections 3.1.1.2, 3.1.1.3 and 3.1.1.4; in addition, these treatments and the processes to achieve these treatments must not change the original chemical composition, with respect to the essential constituents of the waters defined by origin, nor compromise the chemical, radiological and microbiological safety of these waters.

3.1.1.2 Treatments that modify the natural composition:
- *reduction and/or elimination of dissolved gases (and resulting possible change in pH);*
- *addition of carbon dioxide (and resulting change in pH) or re-incorporation of the original carbon dioxide present at emergence;*
- *reduction and/or elimination of unstable constituents such as iron, manganese, sulphur (as S^0 or S^{--}) compounds and carbonates in excess, under normal conditions of temperature and pressure, of the calco-carbonate equilibrium;*
- *addition of air, oxygen or ozone at the condition that the concentration of by-products resulting from the ozone treatment is below the tolerance established under section 3.2.1;*
- *decrease and/or increase in temperature*.]

In response to consumer expectations, waters defined by origin cannot be subject to modifications that would result in changes to their essential physical and chemical compositions, i.e. for major ions (e.g. Na, K, Ca, Cl, etc.) and essential parameters (e.g. dissolved solid content, etc.) but of minor modifications that we need to define; section 3.1.1.1 proposed by Canada reflects this concept and is inspired from the Revised Codex Standard for Natural Mineral Waters (CODEX STAN 108-1981 (Rev. 1-1997).

The change in original temperature completes the list of permitted treatments; this parameter can influence the efficiency of certain other permitted treatments.

Canada recognises that certain catchments may have been established many years ago, often at great expense (recognising that these bottling operations provide employment to many persons), at a time when the health-related limits of certain mineral substances were inexistent or less restrictive (i.e. substances that are natural to the resource but are not the result of pollution or external influence). Canada supports the fact that treatments, in accordance with the criteria described under section 3.1.1, could be permitted in order to bring these waters of origin in compliance with the current safety requirements; section 3.1.1.2 intends to outline such exception. But this exception applies only to natural mineral substances and not to other substances. Indeed, the latter not being "naturally occurring" are exogenous to the source or the exploited resource and their presence at high levels in the water at the collection point is indicative of pollution or external influence and thus demonstrates that this source or resource is not suitable for the production of a water defined by origin and does not meet the criteria for such waters defined under section 2.1.1.

Canada feels that it is not necessary to repeat in the present draft standard all the treatments already described in the Draft Code of Hygienic Practice for Bottled/Packaged Drinking Waters (Other than Natural Mineral Waters) because section 4 of the present standard will reference the Code of Hygienic Practice.

[*3.1.1.3 Exception*
Waters defined by origin that complied with the chemical and radiological safety criteria prevailing at the time of the establishment or the approval of the water collection operation for the production of water intended for human consumption can, in certain cases, be in contravention when new data demonstrate potential health hazards related to the levels of naturally occurring substances found in some waters defined by origin. These waters can be subject to treatments to reduce the level of such substances to bring them in compliance with the updated maximum allowable concentrations outlined under section 3.2.1.]

[*3.1.1.4 Antimicrobial treatments for the waters defined by origin*
Use of antimicrobial treatments such as ultra-violet light, high temperature, micro filtration or addition of

carbon dioxide or ozone are permitted to be used singly or in combination solely to conserve the original microbiological safety, purity, and fitness for human consumption of waters defined by origin. Antimicrobial treatments that make use of chemicals other than carbon dioxide or ozone are forbidden.]

[*3.1.2 Physical and chemical modifications and antimicrobial treatments for prepared waters*
Prepared waters can be subjected to all microbial treatments or any treatments that modify the physical and chemical characteristics of the original water to the condition that such treatments result in prepared waters that comply with all provisions of section 3.2 and 4 regarding the chemical, microbiological and radiological safety requirements for pre-packaged waters.]

Denmark

Denmark proposes that treatments are limited to certain types of bottled water, e.g. prepared waters. Waters defined by origin such as spring water should not be treated except for separation of unstable elements, such as iron and sulphur compounds, by filtration or decanting, possibly preceded by oxygenation.

3.2 ADDITIONAL REQUIREMENTS FOR WATER DERIVED FROM GROUND FORMATION

Waters derived from ground formation (artesian, spring or well water) must not be under the direct influence of the surface water.

Some waters derived from ground formations (artesian, spring or well water), as extracted from their geological source, may contain high levels of some undesirable minerals as iron, sulphur compound and the substances listed in Section 3.3.

The water supply may be treated to selectively remove these undesirable elements.

Brazil

First and second paragraphs: remove the text that is between parenthesis (artesian, spring or well water). Justification: to exist coherence with the proposal of suppression of the referring items of artesian water and of well.

Third paragraph: include the expression **authorised** after the word treated. Justification: So that only allowed substances will be utilised in the treatment.

Canada

See comment from Canada on Section 3.1.3.

Spain

In the second line of the second paragraph, the phrase '...some toxic minerals such as iron, sulphur compound and ...' ('…algunos minerales nocivos como hierro, compuestos sulfúricos y...') should be replaced by '…some undesirable minerals such as iron, sulphur compound and…'

In the second line of the third paragraph, the term '…toxic elements' ('elemento nocivos ') should be replaced by '…undesirable elements'.

3.3 HEALTH-RELATED LIMITS FOR CERTAIN SUBSTANCES

No bottled water shall contain any constituent in quantities that may be injurious to health. Bottled water shall not contain more than the following amounts of the substances indicated hereunder:

	Substance	**Maximum Limit**
3.3.1	Antimony	0.005 mg/l
3.3.2	Arsenic	0.05 mg/l, calculated as total As
3.3.3	Barium	1 mg/l
3.3.4	Borate	5 mg/l, calculated as B
3.3.5	Cadmium	0.003 mg/l

3.3.6	Chromium	0.05 mg/l, calculated as total Cr
3.3.7	Copper	1 mg/l
3.3.8	Cyanide	0.07 mg/l
3.3.9	Fluoride	See Section 6.2.2
3.3.10	Lead	0.01 mg/l
3.3.11	Manganese	2 mg/l
3.3.12	Mercury	0.001 mg/l
3.3.13	Nickel	0.02 mg/l
3.3.14	Nitrate	50 mg/l, calculated as nitrate
3.3.15	Nitrite	0.02 mg/l as nitrite
3.3.16	Selenium	0.05 mg/l

3.3.17 For any other chemical substances, the World Health Organisation's most recent *Guidelines for Drinking Water Quality* may be used as a guide.

Canada

Canada proposes to replace section 3.3 of the draft text developed during the 6th session of the Committee to describe all safety related requirements for all packaged waters under a single section 3.2.

[*3.2 CHEMICAL AND RADIOLOGICAL QUALITY OF PACKAGED WATERS*]
[*3.2.1 Health-related Limits for Chemical and Radiological Substances*
No packaged water shall contain substances or emit radioactivity in quantities that may be injurious to health. To this effect, all packaged waters should comply with the health related requirements for toxic substances and maximum limits for radiological substances set by each country for their respective public drinking water supply. The most recent "Guidelines for Drinking Water Quality" published by the World Health Organization for radionuclides and chemical criteria can also serve as a guide for the packaged waters covered by the present standard, when distributed in each country marketplace.]

This general requirement is applicable to all packaged water products.

Not all countries have adopted all WHO quality criteria for their public community drinking water supply. Many reasons explain and justify this decision, namely the fact that each national authority must take into consideration the occurrence of the toxic substance in its own natural environment and in its food supply (for example, Japan limits the fluoride content of drinking water to 0.8 mg/l while other countries have adopted the WHO guideline of 1.5 mg/l). On the other hand, Canada believes that consumers of all countries expect that commercial packaged waters are as safe as their respective community drinking water supply and vice-versa; this is supported by the fact that in certain areas of the world, bottled water replaces tap water for drinking purposes. Therefore, it would be difficult, if not too strict, to prescribe in the present standard only one set of criteria for maximum allowable concentrations applicable to all countries.

[*3.2.2 Addition of minerals or other substances*
Any addition of minerals or other substances to water before packaging must comply to provisions outlined in the present standard and the Codex Standard for Food Additives (STAN 192-1995, Rev. 1-1997).]

Canada suggests adding section 3.2.2 because the Code of Hygienic Practice does not make reference to the safety requirements outlined in the Codex standard for food additives when substances are added to packaged water intended for human consumption.

Cuba

We consider that the maximum limits must be the same as those established in the Codex Standard for Natural Mineral Waters (CODEX STAN 108-1981, Rev. 1-1997). They must also include other contaminants such as polychlorinated pesticides, surfactants, mineral oil and polynuclear aromatic hydrocarbons, with the same limits as those in the aforementioned standard.

Denmark

Denmark cannot accept the suggested 'health-related' limits for inorganic contaminants in bottled waters that do not comply with the WHO Guidelines for Drinking Water Quality.

Denmark propose that the health related limits for bottled water should correspond to the WHO Guidelines for Drinking Water Quality, which are based on a consumption of 2 litres of water per day, which is not unusual.

CCFAC discussed the same health related limits for natural mineral waters at ist 31st meeting in March 1999. There was agreement with the proposal of the Chairman to bring the levels of contaminants for natural mineral waters into line with the levels in the WHO Guidelines for Drinking Water Quality (Alinorm 99/12A, paragraph 91).

Spain

It is proposed that the Arsenic level be limited to 0.01 mg/l due to its carcinogenic activity and in accordance with the value established in the WHO Guidelines for Drinking Water Quality (1993). If this concentration is exceeded, it would be desirable for the labelling of waters to be accompanied by an inscription which states that, due to its concentration of arsenic, this water must be consumed in moderation.

GISEMES – UNESEM

Application of WHO recommendations for drinking water.

International Soft Drink Council

ISDC recommends setting the limits for these substances according to the WHO guidelines for drinking water.

4. HYGIENE

4.1 It is recommended that the products covered by the provisions of this standard shall be prepared and handled in accordance with the appropriate sections of the Recommended International Code of Practice - General Principles of Food Hygiene (CAC/RCP 1-1969, Rev 3-1997) and the [Draft] Code of Hygienic Practice for Packaged (Bottled) Drinking Waters (Other Than Natural Mineral Waters).

Canada

Terms used in section 4.1 as proposed at the 6th session of the Committee need to be revised and corrected, as applicable.

[4.1 *Code of practice*

It is recommended that the products covered by the provisions of this standard be collected, transported, stored, if applicable treated, and packaged in accordance with the applicable sections of the International Code of Practice – General Principles of Food Hygiene (CAC/RCP 3-1997, Rev. 23(1997) Codex Alimentarius Volume 1-B), and in accordance with the Draft Code of Hygienic Practice for Packaged (Bottled) Waters Other Than Natural Mineral Waters (draft standard adopted at step 8 on December 4, 1999).]

Japan

As for the Hygiene Section, lots of discussions are going on at the CCFH. Therefore, it is more appropriate to reflect the result of discussions at the CCFH to drafting the Hygiene Section, by which this Section will be simplified.

GISEMES – UNESEM

Reference to the Code of Hygiene (Annex I).

4.2 The products should comply with any microbiological criteria established in accordance with the Principles for the Establishment and Application of Microbiological Criteria for Foods (CAC/GL 21-1997).

Brazil

Substitute the expression 'any' **for** 'with the'.

Canada

Provision described under section 4.2 ist already mentioned in the Code of Hygienic Practice.

Spain

In the first line, the phrase '...should comply with any microbiological criteria...' should be replaced by '...should comply with the microbiological criteria...'.

[4.3 APPROVAL OF THE WATERS DEFINED BY ORIGIN
Approval of the water origin must be based upon a field inspection of the source and the recharge zone that shall demonstrate the integrity of the source and safety of the catchment operations consistent with the local regulatory requirements.]

Brazil

Remove the brackets, maintaining the text.

Canada

Not all countries approve or have the required framework to set-up approval system of resources for waters defined by origin and only a limited number approve water resources based on the characteristics proposed under section 2.1.1 for waters defined by origin.

Canada has evaluated a few appraisal systems or schemes (including on-site inspections and use of various types of expertise) to measure the degree of vulnerability of water sources destined to the production of ground waters defined by origin. Based on this experience, it was concluded that there exists only one system that is both objective and efficacious: the continuous, regular and frequent, monitoring of the quality of the water at source based on various measurements of chemical and mostly microbiological parameters indicative of pollution or external influence.

Therefore, Canada suggests the following text to correct section 4.3.

[*4.2. Source Verification and Inspection for Waters Defined by Origin*
Verification of the source of waters defined by origin must be based upon a scientific study adapted to the type of resource (hydrogeology, hydrology, etc.) and based on field survey of the source and of the recharge zone that shall demonstrate the safety of the source and of the collecting operations. The inspection of the source must be continuously confirmed by regular monitoring of the essential constituents, temperature, discharge (in the case of natural springs) and the chemical, radiological and microbiological factors specified under sections 3.2.1 and 4.1. The results of source verification must be made available to the importing country upon request.]

USA

Section 4.3 was placed in brackets at the last CCNMW meeting. The U.S. believes that it is important that there is some mechanism to verify the source of waters defined by origin because there is no way to verify that the water actually came from the labelled source after the water has been bottled. Therefore, waters defined by origin pose a unique situation, especially waters shipped internationally. The U.S. supports the inclusion of section 4.3 in the Codex General Standard for Bottled/Packaged Waters.

5. PACKAGING
The product shall be packed in sealed retail containers suitable for preventing the possible adulteration or contamination of water and shall be in accordance with the applicable sections of the [Draft] Code of Hygienic Practice for Packaged (Bottled) Drinking Waters (Other than Natural Mineral Waters)8[2] .

Canada

It is important to mention that this section is also covered under the various applicable Codex Codes of Practice. Canada suggests a requirement for tamper protection for all packaged waters. This requirement is not described in the Code of Hygienic Practice.

5. PACKAGING

[*In addition to requirements outlined under section 4 of the present standard, packaged waters destined for sale at the retail level must be packaged in hermetically sealed containers with tamper protection seal in order to avoid any adulteration or contamination.*]

GISEMES – UNESEM

To be deleted. Duplication with the Code.

6. LABELLING REQUIREMENTS
In addition to the Codex General Standard for the Labelling of Prepackaged Foods (CODEX STAN 1-1985, Rev. 1-1991), the following provisions shall apply:
6.1 THE NAME OF THE PRODUCT
6.1.1 The name of the product shall be the appropriate term as defined in Section 2.1.

Canada

The approach suggested by Canada rests on the concept that each country would be allowed, based on certain restrictions and guidelines that must be discussed (see section 6.1.1.3 below), to establish the product names and any additional criteria to those of section 2 – DESCRIPTION – (and related references to section 3) that countries see fit based on their respective national traditions and cultural beliefs to avoid misrepresentation of these products on the market.

The phrases "or any other appropriate name (or names)" and "in accordance with additional criteria established, where applicable, by each country" are essential to allow the full respect of national traditions and their evolution. An example of "additional criteria" is the two proposed definitions for "spring water" discussed at the 6th session of the Committee. On one hand, the use of this name required the mandatory demonstration of the collection of the water from a natural emergence or through a borehole close to the natural emergence. On the other hand, the requirement for use of this term was based on a maximum level of total dissolved solids of 500 mg/l.

[*6.1.1 The name of the product shall be, depending on its classification in accordance with Section 2.1:*
6.1.1.1 Waters defined by origin
«spring water», «artesian well water», «well water» or «mineral water» or any other appropriate name (or names) in the case of waters defined by origin that are ground waters described under sub-sections 2.1.1 and 2.1.1.1 and that meet additional criteria established by each country including restricting the name of such water to all, some or only one of these names;
«glacier water» or «iceberg water» in the case of waters defined by origin that are surface waters in accordance with sub-sections 2.1.1 and 2.1.1.2 and that are collected directly from the runoff due to the natural melting of ice from a glacier (or an iceberg) or are obtained from the melting of glacier ice or iceberg ice, the resultant water having the same composition in major minerals as that of the glacier

[2] Being developed by the Codex Committee on Food Hygiene.

source (or iceberg);

The definition of "glacier water", and by extension "iceberg water" as proposed at the 6th session is revised to indicate that, as waters defined by origin, these waters must comply with the provisions of section 2.1.1.

6.1.1.2 Prepared waters
«demineralised water» or «distilled water » or such an appropriate name (or names) as to designate prepared waters in accordance with sub-section 2.1.2 that have, at packaging, a mineral content of the lowest level and with additional criteria established by each country including restricting the name of such water to all, some or only one of these names;
«drinking water» or such an appropriate name (or names) as to designate prepared waters in accordance with sub-section 2.1.2 that have, at packaging, a low or medium level of mineral content and with additional criteria established by each country including restricting the name of such water to all, some or only one of these names;
«mineralised water» or «water enriched with minerals» or such an appropriate name (or names) as to designate prepared waters in accordance with sub-section 2.1.2 that have, at packaging, a high mineral content or when minerals were added in such a manner that the level in the final product is 20% higher that the original level in the water supply and with additional criteria established by each country including restricting the name of such water to all, some or only one of these names.]

The maximum and minimum requirements for mineral content can be established by each country to distinguish the three categories of prepared waters as defined above. It should be noted that the suggested names are not compulsory but only suggestions.

There are three ways of understanding how the consumer perceives the term "mineralised" water:

- the water, after packaging, contains a high level of minerals; or
- minerals have been added to the water, irrespective of the quantity added; or
- minerals have been added to make the mineral content very high.

It is unlikely that the 2nd interpretation would prevail.

For mineral content values of higher that 10 – 20 mg/l, the standard deviation obtained based on analytical measurements is usually of the order of ± 10%; therefore, to be significant, a variation of 20% should be required.

[*6.1.1.3 Labelling restrictions*
Only waters defined by origin, in accordance with the present standard, can be represented by names that refer to the origin or give an impression of specific origin.
The names used or chosen by the countries, in accordance with the present standard, to represent prepared waters cannot apply to waters defined by origin and vice versa.
When applicable, the additional criteria established by the countries for the definition of the chosen names cannot contravene the provisions of the present standard.]

Canada considers these three rules essential to ensure consumer protection and avoid misrepresentation. These rules represent safeguards intended to avoid abusive use of names, considering the liberty given to each country, under section 6.1, to name the products and establish additional criteria to classify the products beyond the requirements outlined under section 2.

The first rule clearly establishes that the names adopted for the waters defined by origin can only be used for products that can comply with the requirements applicable to such waters. This is true for names such as "rain water" or "mountain water", etc.

The second rule states that compounded names such as "mineralised artesian water" or "distilled spring water" cannot be used because they are contradictory.

The last rule stipulates that the "additional criteria established by the countries" cannot contravene the provisions of the present Standard.

USA

The labelling section was not amended at the last committee meeting. We previously offered the following comments that still are applicable.

We recommend that the phrase 'or combination of terms, as applicable' be inserted in Section 6.1.1 after the words 'the appropriate term'. This is in harmony with proposed section 2.1 and would allow flexibility in the use of multiple terms (e.g. 'mineral spring water'). As long as the use of the term is appropriate, we see no reason to preclude such use.

International Soft Drink Council

We recommend that the phrase 'or combination of terms' be inserted in Section 6.1.1 after the words 'the appropriate term'. We further recommend the addition of a sentence that reads: 'The name of the product may also be "Packaged Water" or "Bottled water"'.

6.1.2 Water containing carbon dioxide that emerges from the source and is packaged directly with its entrapped gas or from which the gas is mechanically separated and later reintroduced at a level not higher than naturally occurring in the water, may bear on its label the words ***naturally carbonated*** or ***naturally sparklin***g.

Brazil

Add the expression 'food pattern' **after** carbon dioxide.

Canada

Canada suggest to replace sections 6.1.2 and 6.1.3 by the labelling provisions outlined in the Codex Revised Standard for Natural Mineral Waters - STAN 108-1981 (Rev. 1-1997), with minor adaptations.

[*6.1.2 Carbonation*

6.1.2.1 The following respective declarations should appear on the label in accordance with the following criteria:

In the case of ground waters defined by origin, «naturally carbonated» or «naturally sparkling» if, after packaging, carbon dioxide spontaneously and visibly is given off under normal conditions of temperature and pressure and the carbon dioxide originates from the source at emergence and is present at the same level as was present originally at emergence, with a possible re-incorporation of gas from the same source, taking into consideration a technical tolerance of ± 20 %;

In the case of ground waters defined by origin, «fortified with carbon dioxide» if, after packaging, carbon dioxide spontaneously and visibly is given off under normal conditions of temperature and pressure and the carbon dioxide originates from the source at emergence but is present at a level at least 20% higher than the quantity present originally at emergence, with a possible re-incorporation of gas from the same source;

In the case of all waters, «carbonated» or «sparkling» if, after packaging, carbon dioxide spontaneously and visibly is given off under normal conditions of temperature and pressure and the carbon dioxide does not entirely originate from the same source as that of the water at emergence.]

The precision of the method that measures the quantity of gas in the product must be taken into consideration to determine if the level of carbon dioxide is significantly equal to the level found at the source (i.e. +/- 20%); therefore it is suggested to apply the same precision to determine if the quantity of gas is significantly greater than the level at the source.

[6.1.2.2 The words «non carbonated» or «non sparkling» may apply if, after packaging, there is no visible and spontaneous release of carbon dioxide under normal conditions of temperature and pressure when the packaged is opened.]

Spain

In the third line, the phrase '…naturally carbonated…' should be replaced by '…natural carbonation…' .

In the third line, the phrase '…naturally carbonated '...(carbonatada naturalmente) should be replaced by '…naturally carbonated…' (carbónica natural).

6.1.3 Packaged water which contains carbon dioxide at levels than those naturally occurring in the source of the product shall be labelled with the words ***carbonated, carbonation added, or sparkling.***

Canada

See comment from Canada under Section 6.1.2.

Denmark

For this section some words seem to be missing. Denmark suggests the wording to be: *Packaged water which contains carbon dioxide at levels higher than those naturally occurring in the source of the product shall be labelled with the words* ***carbonated, carbonation added or sparkling.***

Spain

In the second line, we propose replacing the Spanish phrasing: '...carbonatada, con adicción de dióxido de carbono o gaseosa' ('…carbonated, carbonation added, or sparkling') with '…carbónica, con gas añadido o gasificada'.

USA

The word 'other' is missing after the word 'levels'.

New Section

We recommend that the following section be reinstated in the draft standard. Because of the controversy surrounding the use of the word 'natural' it probably will be best left up to individual countries to determine its appropriate use.

'Bottled water may be called natural water in accordance with national regulations.'

6.2 ADDITIONAL LABELLING REQUIREMENTS

6.2.1 ***Mineral content:*** If the content of total dissolved substances of the water is below 500 ppm, or if it is greater than 1,500 ppm, the statement "Low mineral content", or a similar term or the statement "High mineral content", or a similar term respectively, may appear on the principal display panel following the statement of identity.

If labelling indicates the amount of specific minerals present in the product, the label shall describe the amount in mg/l.

Canada

Section 6.2 of the proposed text after the 6th session of the Committee is an example of criteria that need not be defined under the standard itself but should be left to each country to adopt, if warranted, based on their traditional and cultural beliefs. Canada suggests the deletion of this provision and to replace it with the optional provision outlined below.

[*6.2.1 Chemical composition*

The total dissolved solid content of packaged waters can be declared on the principal display panel. With regard to waters defined by origin, the chemical composition that confers the characteristics to the product can also be declared on the label.]

International Soft Drink Council

We agree with the proposal but recommend that it only apply to 'Mineral Water'.

6.2.2 ***Fluoride:*** Packaged water containing added fluoride shall be labelled "Fluoridated water". Any water that is called fluoridated water shall contain not less than 0.8 mg/l fluoride ion. If the product contains more than 1 mg/l of fluoride, the following term shall appear on the label as part of, or in close proximity to, the name of the product or in the otherwise prominent position : "Contains fluoride". In addition, the following sentence should be included on the label: "The product is not suitable for infants and children under the age of seven years" where the product contains more than 2 mg/l fluorides.

Canada

Canada proposes to delay all discussions referring to the fluoride issue until a future revision of the Standard is considered in order to avoid unnecessary delays in the adoption of the standard because of the irreconcilable positions expressed by many countries. However, if the Committee considers warranted to include at this time a provision on fluoride in packaged water, Canada would suggest the following text to replace the proposed text from the 6th session:

[*6.?.? Fluoride:*
The level of fluoride for all packaged waters must be declared on the label if the level present exceeds 0.05 mg/l. Words to the effect that a packaged water contains fluoride or claims referring to its prophylactic properties against dental decay shall not appear on the label unless it contains, as packaged, an amount of fluoride of 1,0 ± 0,2 mg/l. The following sentence shall be included on the label and appear as part of, or in close proximity to, the name of the product or in an otherwise prominent position «The product is not suitable for infants and children under the age of seven years'' where the product contains more that the maximum level set for total fluoride stipulated in accordance with section 3.2.1.]

Canada proposes that all treatments that modify significantly the composition of the water be declared (section 6.3.3), including the addition of fluoride; Canada believes that a declaration such as "added fluoride" is more likely to be informative for the consumer than "fluoridated water" as was proposed during the 6th session for the mandatory labelling declaration when fluoride is added; the latter expression can be understood as meaning the water contains fluoride, whether naturally present or added. Such message can be confusing.

Canada believes that the optimal concentration for fluoride for prophylactic reasons ranges from 0.8 to 1.2 mg/l when the only source of fluoride is water (pending that the water is safe for consumption by infants and children with regard to other chemical constituents such as copper, magnesium sulfate, etc.).

Canada believes that the mandatory declaration of fluoride level in packaged waters is important to health professionals and their clients, especially when the levels of fluoride are significant. This mandatory declaration will help in determining the fluoride that should be supplemented for prophylactic reasons. Since the prophylactic range is between 0.8 and 1.2 mg/l (near 1 mg/l), then a concentration of 0.1, or 0.05, is significant.

Canada is of the opinion that the declaration "contains fluoride", as proposed during the 6th session, be mandatory when the levels of fluoride range from 1 to 2 mg/l (or 1.5 mg/l based on WHO recommendation) is confusing for the consumer: is it a warning that there is a health hazard or is it an indication of a quality characteristic of the water? Canada believes that levels of fluoride below the maximum allowable concentration for fluoride adopted by countries as a criterion of quality for their drinking water supply does not pose a health hazard to all consumers, including infants. Thus, there is no substantial reason to make this declaration mandatory (even if the fluoride level is close to the maximum allowable concentration) except in cases where a product would be represented as suitable for prophylactic reasons, on the condition that the level of fluoride is optimum for this purpose.

Nevertheless, Canada supports the important principle that there must be a mandatory declaration of the level of fluoride to inform the consumer, particularly in cases where the fluoride level is very high. However, it must be recognized that the maximum levels for fluoride in water can differ from one part of the world to another; for example, Europe has adopted a value of 2.0 mg/l, Canada 1.5 mg/l, Japan 0.8

mg/l, to name only a few countries. The Canadian suggestion to adopt the chemical and radiological criteria as outlined under proposed section 3.2.1 would avoid this problem.

Denmark

Denmark finds, in agreement with the recommendations of WHO, that drinking water, bottled or not, should not exceed the level of 1.5 mg/l of fluoride. If water with higher content is marketed, it should therefore be bottled and labelled in such a way that it clearly apperars that it is meant as a dietary supplement or as medicine, and hence can not be confused with normal bottled water.

Dental fluorosis occurs at fluoride concentrations above 0.7 mg/l of fluoride in warm climates and 1.5 mg/l in temperate climates. Therefore, 1.5 mg/l of fluoride should be a maximum limit.

Thailand

We propose that the level of fluoride should be amended from more than 2 mg/l to 1.5 mg/l.

USA

We recommend that this section be divided into 2 sections, one dealing with added fluoride and the other with naturally occurring fluoride as follows:

(a) Added Fluoride. Bottled/packaged water containing added fluoride shall be labeled 'Fluoridated water'. Any water that is called fluoridated water shall contain not less than 0.8 mg/l and not more than 1.3 mg/l fluoride ion.

(b) Naturally Occurring Fluoride. We believe that this section should be modified to state that if the product contains more than 1 mg/l of **naturally occurring** fluoride, that the product bear the statement 'Contains fluoride' so that consumers can be aware of the presence of significant amounts of naturally occurring fluoride in waters to assist them in controlling their overall fluoride intake.

GISEMES – UNESEM

The text regarding waters with a fluoride content between 0.8 mg/l and the limit of 1.5 mg/l established by WHO should be deleted from the standard and referred to the national authorities.

6.2.3 ***Geographic location:*** The geographic location may be indicated on the label for artesian, spring or well water.

Brazil

Substitute the title for: Identification of the origin.

Make the substitution of the sentence: '...may be indicated on the label for artesian, spring or well water' **for** 'may be indicated on the label of the ground waters.'

Canada

Mandatory declaration of the name of the source cannot be applied to all countries, since some countries lack a regulatory framework to require the naming of the source. Canada believes that a complete and accurate declaration regarding the origin of the water is important and logical in the case of waters defined by origin; these waters could be marketed under different brand names and this mandatory declaration would help the consumer recognize that different brands of water may originate from a unique source.

[*6.2.3 Geographic location*

For all waters defined by origin, the geographical location of the source and the name of the source, if applicable, must be declared. When these waters are exported, the indication of the geographical locating must include the name of the municipality followed by the region and the country of the site of collection.]

Denmark

For 6.2.3 geographical location only artesian-, spring- or well water are mentioned. Denmark suggests that glacial water be included in this section.

USA

We recommend that the term 'glacial' be inserted after the word 'artesian'.

GISEMES – UNESEM

The geographic origin may be indicated on the label for waters defined by origin in accordance with the provisions of Section 2.1.1.

6.2.4 ***Water from water distribution system:*** When drinking water is supplied by a public or private tap water distribution system, the wording "From a public or private distribution system" must appear along with the name of the product on the front of the main label.

Brazil

To substitute the expression 'main label' **for** 'other labels'.

Canada

Canada believes that the mandatory declaration "from a public or private distribution system" for all prepared waters collected from a public community drinking water supply is too strict. Canada proposes a text to replace this requirement.

[*6.2.4 Water from a water distribution system*
When prepared water is supplied by a public or private tap water distribution system and that the original composition, as collected from the tap water supply, is not modified before packaging by the addition or removal of components that would result in change of more than 20% of the original total dissolved solid content or by addition of carbon dioxide or fluoride, the wording "From a public or private distribution system" must appear on the label along with the name of the product on the principal display panel]

Canada suggests that this wording not be required for all prepared waters originating from a community water supply. For example, if the water is distilled or demineralised and these treatments identified on the label, what is the advantage of knowing that the original water came from a community water supply? What additional information does it bring to the consumer on the quality of the final product? To our opinion, none. However, if the original water is not modified, before packaging, then this declaration informs the consumer that the product is identical to water from a community water supply that is already supported by taxes paid by consumers, or that the water may even be the same as that supplied to his/her residence. Thus, section 6.2.4 proposed by Canada intends to single out this situation only and discourage this practice.

[*6.2.5 Treatments*
If packaged water has been modified before packaging, the result of the modifications must be declared on the label:

- *disinfection treatments other than application of high temperature, ultra-violet irradiation or micro-filtration;*
- *addition of one or many minerals;*
- *reduction or removal of one or many minerals originally dissolved in the water at the point of collection.*]

Canada believes that there as many justifications, in the interest of consumers, to render such declaration mandatory for packaged waters under the present standard as there were to justify the same requirement for natural mineral waters under the Codex Revised Standard for Natural Mineral Waters

(section 6.3.3 of the STAN 108-1981 (Rev. 1-1997). However, Canada is of the opinion that treatments such as use of high temperature (pasteurisation or UHT), use of ultra-violet irradiation or micro-filtration have little influence on the original composition of the waters and that mandatory declaration of these is not justified.

Cuba

We suggest that in this title 'water distribution' is replaced by 'public or community distribution'.

USA

We suggest that the title of this section be changed to **Water from drinking water systems** to conform with terminology in the Code of Hygienic Practice for Bottled Waters. We also recommend exempting products from this provision that have been treated to meet the definitions for 'purified water' or 'sterile water' because these types of waters (1) have been significantly altered from the drinking water system and (2) are purchased by consumers for their treatment rather than for their source.

New Section

We recommend that the following section dealing with infant waters be reinstated in the draft.

Infants *When the label or labelling of bottled water product states or implies that the water is for use in feeding infants, and the product is not commercially sterile, the principal display panel shall bear the statement 'Not sterile. Use as directed by physician or by labelling directions for preparation of infant formula'.*

Infant caregivers may assume that because water is sold in a bottled that is labelled for infant use that it is suitable for such use without further treatment. This can be a concern if medical personnel recommend boiling water for an infant before mixing with formula. In addition it would be appropriate to label bottled water for infants with directions to seek medical supervision because of concern about excessive feeding of water (and risk of hyponatremia) to infants. Such labelling is an U.S. Requirement and we note that an EU Directive, dated 15 July 1980, stated that 'member states may adopt special provision regarding information – both on packaging or labels and in advertising – concerning a water's suitability for the feeding of infants. Such provision may also concern the properties of the water which determine the use of the said information.'

International Soft Drink Council

We recommend that this requirement be modified to insert an exception for water that undergoes further treatment, e.g. the requirement should then read:

'Water from water distribution system: When drinking water is supplied by a public or private tap water distribution system and does not undergo further treatment, the wording "From a public or private distribution system" must appear along with the name of the product on the front of the main label.'

It is easily understood that when water is further treated, then it is no longer the same water as that from a public or private tap water distribution system and therefore, should not have to be labelled as such.

6.3 LABELLING PROHIBITIONS

Claims concerning medical (preventive, alleviative, or curative) effects relating to the health of the consumer, in respect of the properties of the product covered by the standard, may be made only in accordance with the Codex General Standard for Labelling of Prepackaged Foods (CODEX STAN 1-1985, Rev. 1-1991), as amended.

The way in which labels on packaged water are presented must not cause confusion with other categories of water, particularly natural mineral water, as defined in the Standard for Natural Mineral Waters (CODEX STAN 108–1981, Rev. 1-1997).]

Canada

Canada proposes to use the same labeling prohibitions as those outlined in the Codex Revised Standard for Natural Mineral Waters - STAN 108-1981 (Rev. 1-1997).

[*6.3.1 No claims concerning medicinal (preventive, alleviative or curative) effects shall be made in respect of the properties of the product covered by this standard. Claims of other beneficial effects related to the health of the consumers shall not be made unless true and not misleading, in accordance with the Codex Standard for Labelling of Prepackaged Foods (CODEX STAN 1-1985, Rev. 1-1991), as amended.*]

[*6.3.2 The name of the locality, hamlet or specified place may not form part of the trade name unless it refers to a water defined by origin collected at the place designated by that trade name.*]

[*6.3.3 The use of any statement or of any pictorial device which may create confusion in the mind of the public or in any way mislead the public about the nature, origin, composition and properties of packaged waters put on sale is prohibited.*]

USA

We object to the inclusion of the second paragraph in this section. Specifically drawing attention to natural mineral water in this section is inappropriate and acceptable. The provisions of the Codex General Standard on the Labelling of Prepackaged Food that requires that all labelling must not be confusing are adequate.

International Soft Drink Council

We object to the inclusion of the second paragraph regarding the hypothetical label confusion with natural mineral water. The Codex General Standard on the Labelling of Prepackaged Food makes it clear that all labelling must not be confusing. If the sentence is retained at all, the sentence should end after the words 'must not cause confusion with other categories of water'. There is no need and it is inappropriate to name one category of water where confusion might presumably occur when it is the intent of the sentence that no confusion with any other category of water should occur.

7. METHODS OF ANALYSIS AND SAMPLING

To be developed for endorsement by the Codex Committee on Methods of Analysis and Sampling.

Canada

Since reference is often made in the present standard to total dissolved solid content, the adoption of an appropriate definition must be considered in the short term.

N.B. In the present standard, the terms «dissolved solid content», «mineral content» and «dry residue» correspond to the same measurement giving the weight of residual solids obtained by evaporation of a water sample, previously filtered through 0.45 micron membrane, followed by drying the residue for 24 hours at 180 ^{0}C and cooling of the dried residue under dry conditions to bring down the temperature to the room temperature of the balance room; the volume of water for the sample must be chosen to reach a precision for the final result of less than ± 10%.

Cuba

We feel that these must be similar to those for mineral waters.