CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Item 8 **CRD09**

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JOINT FAO/WHO FOOD STANDARDS PROGRAMME
CODEX COMMITTEE ON FOOD HYGIENE
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PROPOSED DRAFT GUIDELINES FOR THE SAFE USE AND RE-USE OF WATER IN FOOD PRODUCTION

(Comments from Dominican Republic, Ecuador, Malaysia, Philippines and Rwanda)

Dominican Republic

República Dominicana agradece la preparación del documento de trabajo a Honduras, presidente del GTe y copresidido por Chile, Dinamarca, la India y la Unión Europea.

En relación a las cuestiones pendientes de disposición:

En ii. a) Si se debe utilizar el término "agua potable" en lugar de "agua para beber" en todo el documento.

República Dominicana, apoya se utilice solo el término **"agua potable"** en todo el documento.

República Dominicana apoya que el Anteproyecto de Directrices para el uso y la reutilización inocuos del agua en la elaboración de alimentos avance al trámite 5.

Ecuador

COMENTARIOS GENERAL

En referencia al Documento de Debate, mediante el cual *"(…) se invita a los miembros del Codex y observadores a presentar sus observaciones sobre el "Anteproyecto de directrices para el uso y la reutilización del agua inocuos en la elaboración de alimentos";* al respecto:

Ecuador expresa su agradecimiento a todos los países que trabajan y contribuyen en la elaboración del referido Anteproyecto; en tal virtud y luego de haber realizado el análisis técnico correspondiente; el país sugiere tomar en cuenta los siguientes puntos:

- En lo referente al análisis de agua, se recomienda que no sea únicamente microbiológico, sino que se considere otros parámetros de calidad (físicos y químicos) para evitar la presencia de contaminantes como el arsénico y otros metales pesados que por lo general se encuentran en aguas de pozo.
- Establecer directrices que establezcan el consumo máximo de agua en actividades productivas, y que este no prevalezca sobre las necesidades de uso y consumo humano de la población.

Adicionalmente se sugiere que se utilice el término "agua potable" en lugar de "agua para beber" en todo el documento.

Malaysia

Malaysia appreciates the work of the Electronic Working Group and the Chair, Honduras and co-chairs, Chile, Denmark, European Union and India on the Draft Guidelines for the Safe Use and Re-use of Water in Food Production and also appreciates the opportunity to provide comments on the draft guidelines.

Malaysia supports the term "potable water" to be used throughout the document because the term is commonly used in other Codex texts and the JEMRA report.

With regard to whether to keep in paragraphs 5 to 36 adapted to the scope of this guidelines, or to replace by a cross-reference to CXC 53-2003, Malaysia agrees to keep in paragraphs 5 to 36 adapted to the scope of this guidelines as it is more feasible and for easy reference.

Malaysia also agrees with the suggestion to ask FAO/WHO for the request on validation of the examples as

well as more concrete recommendations on thresholds and sampling frequencies.

Malaysia agrees with the following definitions as in Annex II Fishery Products:

> Fishery products: “Any species of fish, including crustaceans, molluscs, gastropods, or part of them intended for human consumption”.
>
> Harvesting: “Operations involving taking the fish from the water”

Malaysia also agrees to hold the document until the JEMRA expert report on water use and reuse for fish and fishery products becomes available.

Philippines

Comment Type	Category	Proposed Change	Comment
General, Recommendations, paragraph 16, ii (a)	Substantive	N/A	The Philippines proposes to use the term “potable water” rather than “drinking water” throughout the document. The term potable water is used in the Philippine National Standard (PNS) on Good Agricultural Practices (GAP) on Fruit and Vegetable Farming (PNS/BAFS 49:2017/2021), Good Aquaculture Practices (PNS/BAFS 135:2014), and other similar national standards. It is defined as “water that is suitable for human consumption as approved by WHO or equivalent regulations.”
General, Recommendations, paragraph 16, ii (b)	Substantive	To determine whether to keep paragraphs 5 to 36 adapted to the scope of this guidelines, or to replace by a cross-reference to CXC 53-2003	The Philippines proposes to keep paragraphs 5 to 36 to provide a briefer on the pre-harvest and post-harvest uses of water, which puts into context the re-use of water.
General, Recommendations, paragraph 16, ii (c)	Substantive	To consider If the information provided in the annex so far is enough or to hold the document until JEMRA expert meeting on water use and reuse for fish and fishery products becomes available to include further information.	The Philippines proposes that the CCFH wait for the JEMRA expert meeting to provide further scientific information to support the current text as it is written.
Specific, Appendix I, Introduction, paragraph 4	Substantive	Water used for food production is a critical key food safety element, since water quality can be affected by the presence of biological, ~~and~~ chemical **and physical** hazards.	Addition of physical hazards in the paragraph to take into consideration that this type of hazard is also a critical food safety element. Physical hazards are also mentioned in other parts of the docuemnt so this provides consistency.
Specific, Appendix I, Introduction, paragraph 5	Substantive	Though the safest option in food production may be the use of potable-water; it is, however, often not a sustainable, viable, practical solution and other types of water may be suitable ~~for certain~~	Proposal to delete since this may introduce vagueness as to what other purposes may imply

Comment Type	Category	Proposed Change	Comment
		~~purposes,~~ provided that they do not compromise the safety of the final product for the consumer.	
Specific, Appendix I, Introduction, paragraph 6	Substantive	~~Substandard~~ **Inadequate** water quality may have serious effects on food processing facilities, hygiene practices and public health. The consequences of using water with inadequate quality (i.e. water that is not fit for purpose) will depend on the purpose of the use and further processing or handling of potentially contaminated materials. Occasional variations in water quality can be unacceptable for some uses in the food industry and may have consequences with significant economic impacts in food production due to e.g. the withdrawal of the product from the market, or health impacts on the consumer.	Replace “substandard” with “inadequate” for consistency since inadequate quality is also used in the 2nd sentence of the paragraph.
Specific, Appendix I, Introduction, paragraph 8	Ediorial	Deciding whether water is fit for purpose should be based on ~~an assessment of~~ risk **assessment** that considers the source water, including potential hazards linked to this water source, treatment options and their efficacy, application of multiple barrier processes, ~~and~~ the end use of the food product (e.g. whether the food is eaten raw).	Propose to replace with "risk assessment" to be consistent with the rest of the document.
Specific, Appendix I, Introduction, paragraph 10	Editorial	The annexes also provide examples such as Decision tree tools (DTT) to ~~determinate~~ **determine** water fit for purpose.	Replace with "determine"
Specific, Appendix I, Objectives, paragraph 11, bullet 3	Editorial	Develop practical guidance and tools (e.g. Decision Tree Tools) to help FBOs evaluate risks and potential interventions as part of their food safety management ~~programmes~~ **systems**; and	Propose to replace with "systems" which is a more encompassing term than programmes
Specific, Appendix I, Purpose and Scope, paragraph 14	Substantive	These Guidelines are complementary to and should be used in conjunction with the General Principles of Food Hygiene (CXC 1-1969), the Code of Hygienic Practice for Fresh Fruits and Vegetables (CXC 53-2003), the Code of Practice for Fish and Fishery Products (CXC 52-2003), the Code of Hygienic Practice for Milk and Milk Products (CXC 57-2004), Principles and Guidelines for The Conduct of Microbiological Risk Management (MRM) (CXG 3-2007), ~~and~~ Principles and	Addition of the Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods (CXG 21-1997) as major reference.

Comment Type	Category	Proposed Change	Comment
		Guidelines for The Conduct of Microbiological Risk Assessment (CXG 30-1999), **and Principles and Guidelines for the Establishment and Application of Microbiological Criteria Related to Foods (CXG 21-1997).**	
Specific, Appendix I, General Principles, iii	Editorial	~~Only water complying with the standards of potable water~~ **Water used as an ingredient in food should comply with the standards of potable water** (such as those established by competent authorities having jurisdiction or the WHO Guidelines for drinking Water Quality) ~~should be used as an ingredient in food.~~	Proposal to re-phrase the sentence to give emphasis to the water used as an ingredient.
Specific, Appendix I, General Principles, v	Editorial	Water should be obtained from appropriate sources and **when necessary** be of a quality that enables treatment, ~~when necessary,~~ by the means available to the ~~food business~~ **FBOs**, to render the water fit for its intended purpose	Proposal to rephrase the sentence for clarity Proposal to use the acronym FBOs, since the term Food Business Operators (FBOs) was already mentioned in the document
Specific, Appendix I, General Principles, vi, second sentence	Editorial	The frequency of monitoring and verification ~~are~~ is dictated by ~~such factors as~~ **factors such as** the source of the water or its prior condition, the efficacy of any treatments, and the intended reuse of the water.	Proposal to rephrase the sentence for clarity
Specific, Appendix I, Definitions	Editorial	**Water fit for purpose**: water which is determined through ~~an assessment of~~ risk **assessment** to be safe when used ~~as intended~~ **for its intended purpose**	Proposal to replace with "risk assessment" to be consistent with the rest of the document Rephrase for a clearer statement of the definition.
Specific, Appendix I, Definitions	Substantive	**Potable water:** ~~Fresh~~water fit for human consumption. Standards of potability should not be lower than those contained in the latest edition of the International Standards for Drinking-water issued by the World Health Organization (*Code of Hygienic Practice for Fresh Fruits and Vegetables* (CXC 53-2003)	Propose to replace “freshwater” with "water" since use of "freshwater" will require that it should also be defined.
Specific, Appendix	Substantive	**~~Risk assessment:~~** ~~A systematic~~	Proposal to replace the definition

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I, Definitions		~~examination to identify hazards and risk and determine appropriate ways to eliminate the hazard or control the risk when the hazard cannot be eliminated (risk control).~~ **Risk assessment: A scientifically based process consisting of the following steps: (i) hazard identification, (ii) hazard characterization, (iii) exposure assessment, and (iv) risk characterization.**	of risk assessment as defined under the CAC Procedure Manual 24th Edition (Definitions of Risk Analysis Terms Related to Food Safety)
Specific, Appendix I, Section 2: Food Safety Management Programmes	Editorial	**SECTION 2: FOOD SAFETY MANAGEMENT ~~PROGRAMMES~~ SYSTEMS**	Proposal to replace with "systems" which is a more encompassing term than programmes
Specific, Appendix I, paragraph 22	Editorial	Risk-based water management plans should, in addition to addressing safe water sourcing, use or reuse also consider many factors when developing and implementing the plan~~ation.~~**s**	Delete “ation” and use the word “plans”
Specific, Appendix I, paragraph 23, 1st sentence	Editorial	~~Water safety risk management~~ **Risk-based water safety management** requires an identification of potential hazards (microbiological, chemical, physical agents with the capacity to cause damage to water safety) and their sources.	Proposal to use the term risk-based water safety management for consistency with paragraphs 21 and 22
Specific, Appendix I, Section 3. Decision Support Systems , paragraph 24	Editorial	~~DDS~~ **DSS**	Change to DSS for the correct acronym of Decision Support Systems (DSS)
Specific, Annex I Fresh Produce, Reuse of water, paragraph 38	Editorial	The water use**d** in the final rinsing step should be potable water.	Change “use” to “used” for correct tense of the word
Specific, Annex I Fresh Produce, Reuse of water, paragraph 44	Editorial	If treating water for use in washing and rinsing, it is recommended to see**k** professional advice	Change the word “see” to “seek” as it is more appropriate in the sentence
Specific, Annex I Fresh Produce, Risk Assessment to Determine Fit for Purpose paragraph 48, 1st bullet	Substantive	Identification of water-related biological **and chemical** hazards and source of those hazards, relevant for the area of production	Proposal to add chemical hazards in the bullet since this should also be taken into account during risk assessment.

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Specific, Annex I Fresh Produce, Pre-harvest, paragraph 59	Substantive	N/A	Include both *E.coli* and enterococci in the example for microbial testing of water since both are mentioned as indicator organisms in paragraph 50.
Specific , Annex II Fishery Products, Specific, Introduction, paragraphs 1 and 2	Editorial	**The fisheries sector plays an important role in the economy of many countries. The quality of water used in postharvest interventions, particularly aquaculture and fish processing, has a significant impact on the safety of final product. This Annex addresses the water quality used in aquaculture, and fish and fishery products processing - from the ponds and/or fishing vessels (including water used for on-board storage, ice production, washing, etc.) and throughout processing facilities."**	Proposal to combine paragraphs 1 and 2 into one paragraph since they carry the same thought.
Specific, Annex II Fishery Products, Purpose and Scope, paragraph 3	Editorial	The scope includes farming or capture of the fish or fishery product as well as subsequent ~~holding~~ **handling** and processing activities…	Proposal to consider the use of term "handling" instead of "holding" since it is a more general term.
Specific, Annex II Fishery Products, Definitions	Substantive	Proposed definition of fishery products Fishery products bis: any cold-blooded aquatic animal~~,~~ or any part or product derived therefrom ~~intended for food for human consumption~~, and includes any **fin**fish, crustacean**s**, molluscs, echinoderm, holothurian, or aquatic reptile**, seawater and freshwater aquatic animals, in whatever form whether fresh, chilled, frozen or processed, including fish oils, squalene and blubbers intended for human consumption.**	We propose to use the definition under fishery product bis with some modifications, following the definition under the Philippine Republic Act 8550 (The Philippine Fisheries Code of 1998) and Fisheries Administrative Order No. 227, series of 2008 (Code of Practice for the Export of Fish and Aquatic Products to the European Union)
Specific, Annex II Fishery Products, Definitions	Substantive	Proposed definition of harvesting Harvesting – operations involving taking **or removing** the fish from the ~~water~~ **growing areas**	Proposal to combine the two proposed definitions
Specific, Annex II Fishery Products, Definitions	Substantive	Proposed definition of fit for purpose water Fit for purpose water: water whose safety requirements are determined	Propose to adopt the more simple definition which is more flexible and less prescriptive.

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		by its use and will not confer any hazard at the point of application.	
Specific, Annex II Fishery Products, Water Used in Extensive Systems, paragraph 8	Substantive	Fish farms or growing areas should be located where contamination is unlikely and that avoids, to the extent possible, introduction of ~~*microbial*~~ **microbiological, chemical and physical** hazards to the growing water.	Change from “microbial” to “microbiological” and addition of chemical and physical hazards for consistency throughout the document. This is also stated in Section 6.1.1 of the Codex Code of Practice for Fish and Fishery Products
Specific, Annex II Fishery Products, Decision Tree example of onboard processing and handling of marine/ estuarine fish	Editorial	Initial pathogen load before ~~on-shore~~ **onshore** processing ~~On-Shore~~ **onshore** Processing	Proposal to use the term “onshore" throughout the document for consistency. The sample DTs uses "on-shore" while the figure title spells "onshore".
Specific, Annex II Fishery Products, Decision Tree, example of onshore processing of marine/estuarine fish	Substantive	Do you wash the cavity with potable ~~fresh~~water?	To use the term “potable water” for consistency

Rwanda

Section or Paragraph:

Recommendation 16 (ii)

(a) Whether the term “potable water” rather than “drinking water” should be used throughout the document.

Comment/Proposed Changes :

-Rwanda supports the use of “potable water” rather than “drinking water” throughout the document

Rationale :

In order to align with other codex documents

Section or Paragraph:

(b) As regards the Fresh Produce annex:

- To determine whether to keep in paragraphs 5 to 36 adapted to the scope of this guidelines, or to replace by a cross-reference to CXC 53-2003.
- To evaluate the remaining examples and determine if the tools (DT) are appropriate for the development of the document.

Comment/Proposed Changes :

- Rwanda supports to keep paragraphs 5 to 36 adapted to the scope of the guideline (Fresh Produce annex)
- Rwanda agrees that the tools (DT) are appropriate for the development of the document (Fresh Produce annex). With no additional comments

Rationale :

It is easy for the users of the guideline when the content in paragraphs 5-36 is kept in the guideline instead of referring to the CXC53.

Section or Paragraph:

c) As regards the Fishery Products annex:

- To choose the most appropriate definitions for fishery products, harvesting and fit for purpose water, from the proposed definitions in section 4.
- To consider if the information provided in the annex so far is enough or to hold the document until the JEMRA expert report meeting on water use and reuse for fish and fishery products becomes available to include further information.

Comment/Proposed Changes：

- The most appropriate definitions:
  1. **Fishery products:** Any species of fish, including crustaceans, molluscs, gastropods, or part of them intended for human consumption
  2. **Harvesting:** Operations involving taking the fish from the water
  3. **Fit for purpose water:** Water whose safety requirements are determined by its use and will not confer any hazard at the point of application
- **Rwanda suggests to** hold the document until the JEMRA expert report meeting on water use and reuse for fish and fishery products becomes available to include further information essential to finalize Fishery products annex

Rationale：

To be consistent with the CXC 52