Session of the Codex Committee on FOOD HYGIENE
Report of the EWG

“Guidelines for the Safe Use and Reuse of Water in Food Production”
INTRODUCTION

• At CCFH51 Honduras, Chile, Denmark, India and the European Union introduced a discussion paper and Project document regarding the use and reuse of water in food production.

• CCFH51 agreed to take new work to include overarching guidance and commodity-specific guidance using a step-wise approach with fresh produce and fishery products as priorities.

• An EWG was established and had two round of comments during 2020 and 2021 using the Codex Alimentarius Forum to elaborate a draft document. 34 member countries and 9 observer organizations participated in the EWG.

• Circular Letter CL/2021/64/OCS-FH was uploaded to the Codex Online Commenting System (OCS) in October 2021 and open to all members for comments. 23 member countries and 8 observer organizations provided comments.
INTRODUCTION

• The proposed draft document has 3 parts: General Part, Annex I Fresh Produce, Annex II Fishery Products and a fourth part on Milk and Milk Products for further elaboration.

• JEMRA Reports #33 “Safety and Quality of Water Used in Food Production and Processing” and #37 “Safety and Quality of Water Used with Fresh Fruits and Vegetables” have been used as the main scientific reference to draft the document.

• JEMRA reports on fishery and milk and milk products are expected to be published in 2022 before CCFH53.

• The chairs of the EWG have asked for input from members on several issues including definitions, retention of certain text, organization of the information, decision support systems and other practical examples.

• CCFH52 is asked to discuss and agree on overarching issues of the document and to determine the need to ask JEMRA for further work and elaborate TORs if needed.
Proposed Draft Guidelines for the Use and Reuse of Water in Food Production

• General Comments
  Overall support from member countries to the document.

• Summary of (main) specific comments (GENERAL PART):
  Editorial comments for consistency
  Proposed definitions (new) and editorial suggestions

• Q1 Relevant terminology – the use of “potable water” or “drinking water” throughout the document
  20 member countries and 3 observer organizations in favor of potable water
  2 member countries and 2 observer organizations in favor of drinking water
Proposed Draft Guidelines for the Use and Reuse of Water in Food Production
Annex I
Fresh Produce
Proposed Draft Guidelines for the Use and Reuse of Water in Food Production – Annex I Fresh Produce

- Key issue 1: determine whether to keep the revised paragraphs 5 to 36 adapted to the scope of this guidelines, or to replace by a cross-reference to CXC 53-2003?

- Keep in: 12 Members (ARG, COL, CRI, EGY, IND, KEN, MYS, MEX, PER, PHIL, RWA, USA,), EU and ICUSMA + IFT

- Replace by cross-reference to CXC 53-2003: 6 Members (AUS, BRA, IRN, JPN, SAU, URY)

- Mimimize to what is new: 2 Members (CAN, NZL)
Proposed Draft Guidelines for the Use and Reuse of Water in Food Production – Annex I Fresh Produce

- Key issue 2: Appropriate examples and Decision trees?
- Appropriate: 9 Members (CAN, IND, KEN, IRN, PER, RWA, SAU, URY (Decision trees only), USA (examples in Appendix), EU and ICUSMA
- Not appropriate: JPN (replace by (references to) national/local guidances), URY
Proposed Draft Guidelines for the Use and Reuse of Water in Food Production – Annex I Fresh Produce

• Key issue 3: Request to FAO/WHO to validate/critically review examples + give concrete recommendations on thresholds and sampling frequencies

• Support: 10 Members (ARG, COL, CRI, IRN, KEN, MYS, PER, SAU, URY, USA), EU and ICUSMA

• No support: CAN, JPN
Proposed Draft Guidelines for the Use and Reuse of Water in Food Production – Annex I Fresh Produce

• Can CCFH ask JEMRA to:
  1. Critically review the approaches presented in Annex I, in particular:
     • The decision tree approach in paragraph 57
     • The example of a decision support system in:
       • paragraph 58 to 61
       • paragraph 62 to 68
       • paragraph 69 to 72
       • paragraph 73
  2. Provide recommendations how these examples could be adapted, if possible, in countries with water scarcity and/or more limited resources without putting food safety at stake.
Proposed Draft Guidelines for the Use and Reuse of Water in Food Production
Annex II
Fishery Products
Proposed Draft Guidelines for the Use and Reuse of Water in Food Production – Annex II Fishery Products

• **Question 1:** Choose the most appropriate definitions for fishery products, harvesting and fit for purpose water from the proposed definitions in section 4

**Fishery products:** Any species of fish, including crustaceans, mollusks, gastropods, or part of them intended for human consumption.

  • 7 members support.
  
  • More congruent with definition of fish in CXC 52-2003

**Fishery products bis:** any cold-blooded aquatic animal, or any part or product derived therefrom, intended for food for human consumption, and includes any fish, crustacean, mollusks, echinoderm, holothurian, or aquatic reptile;

  • 7 members support
  
  • One member asked to delete Holothurian since it is covered by echinoderm
  
  • Some members propose to delete “or aquatic reptile” to be congruent with CXC 52-2003 and One member asked to delete “or product derived therefrom” since Oils and other products are not part of the scope.
  
  • One member asked to include “aquatic plants”
  
  • One member suggested to add “Any of the cold-blooded (ectothermic) aquatic vertebrates. Amphibians and aquatic reptiles are not included” as in CXC52-2003.
Proposed Draft Guidelines for the Use and Reuse of Water in Food Production – Annex II Fishery Products

• Question 1: Choose the most appropriate definitions for fishery products, harvesting and fit for purpose water from the proposed definitions in section 4

**Harvesting:** Operations involving taking the fish from the water
- Most supported definition
- One member suggested to talk about “aquatic animals” instead of fish
- Several members proposed to add “for the purpose of food production” at the end of the definition.

**Harvesting bis:** The capture and landing of the fish from growing areas

**Fit for purpose water:**
- Eliminate from the annex and maintain only at the general part for the whole document.
Proposed Draft Guidelines for the Use and Reuse of Water in Food Production – Annex II Fishery Products

• Question 2: Is the information enough or hold the document until the JEMRA report for fishery products becomes available?
• 16 Member Countries and EU suggest to hold the document
• 2 Member Countries agree that the information provided in the document is relevant to continue with the next steps
• Other considerations
• To reduce the definitions and eliminate those terms that are well understood
• To ask JEMRA for examples for shellfish (e.g. clams and oysters)
Proposed Draft Guidelines for the Use and Reuse of Water in Food Production – Annex III Milk and Milk Products

- Not yet elaborated
- Specific-commodity annex for milk and milk products to be worked during the next few months and presented at CCFH53.
- Co-chair to be confirmed
CONCLUSIONS

1. The EWG completed the tasks assigned by CCFH51 by drafting a document in English composed of 3 parts: a general section, fresh produce annex and a fishery products annex

2. There is overall support from Member Countries and Observer Organizations to the proposed Guidelines

3. Further work is required to elaborate a new draft document to incorporate the comments to CL/2021/64/OCS-FH
RECOMMENDATIONS

1. CCFH52 is invited to discuss the overarching (key issues) in the draft document:
   
   • Agree to use the term potable water instead of drinking water throughout the document considering the large support of Members and Observer Organizations.
   
   • Agree in maintaining paragraphs 5-36 in Annex I considering the large support of Members.
   
   • Determine if further work is required by JEMRA regarding examples and develop ToRs if needed.
   
   • Endorse an EWG to continue the work to prepare a new draft document to be presented at CCFH53 at step 3.
   
   • Consider the possibility of having a physical working group (PWG) meeting prior to CCFH53.
RECOMMENDATIONS – Proposed ToRs for EWG

CCFH52 is asked to agree to establish an EWG to continue elaborating the “Proposed Draft Guidelines for the Safe Use and Re-Use of Water in Food Production” based on comments received and the recommendations of CCFH52, to

• Revise the draft general guidance document
• Revise the draft Annex 1 on use and re-use of water in the production of fresh produce
• Revise the draft Annex 2 on use and re-use of water in the fishery sector
• Develop an Annex 3 on use and re-use of water in the dairy sector (?)

The EWG will be chaired by Honduras and co-chaired by Chile, EU, India and xxx, working in English to prepare new proposed draft guidelines for circulation for comments at Step 3 and consideration at CCFH53. The EWG will take into account published and future JEMRA work on water.

The report of the EWG should be made available to the Codex Secretariat at least 3 months before CCFH53 for circulation for comments at Step 3.
Thank you!