CODEX ALIMENTARIUS COMMISSION

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World Health Organization

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Agenda Item 6 **CRD04**

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

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Proposed Draft Guidelines for the Safe Use and Reuse of Water in Food Production and Processing

(Comments of Brazil, European Union, India, Indonesia, Morocco, Norway and Philippines)

Brazil

Guidelines for the microbiological safety use and reuse of water in food production and processing.

Rationale: We propose the inclusion of the term microbiological in order to avoid confusion regarding the application of the document. These guidelines do not consider chemical hazards. According to the original title it seems that all types of hazards are being considered for the use and reuse of water.

Paragraph 5. A risk-based approach to water sourcing, treatment, handling, storage, and use can help in identifying the hazards associated with the water and its use in order to ~~and~~ determine treatments, if applicable, that water needs to undergo, if applicable, to meet the safety parameters specific to each intended use. This approach can also provide a means to address many of the water access and safety challenges associated with reuse based on the principle of using the right water safety for the intended purpose/need.

Rationale: editorial

DEFINITIONS

Water fit for purpose: water that is determined to be safe for an intended purpose through an assessment of potential hazards, treatment options and their efficacy, control measures, history of use, and the end use of the food product.

Rationale: Brazil prefers option 1 since we don't agree with the term water risk assessment to name the approach used in this document.

Water risk assessment (Option 1) or **Water risk analysis** (Option 2)

Rationale: Brazil is not comfortable with the use of terms like Risk assessments/risk analysis or similar terms (water risk assessment/water risk analysis) with a meaning different from the one defined in the Manual Procedural. This brings a lot of confusion to the purpose of the document. Perhaps it is better to call it a risk-based approach/strategy for determine use or reuse of water in food production, since it is not a risk assessment, nor a risk analysis.

Active management/ Passive management:

Rationale: There is no need to classify management, active or passive. This management typing doesn't even appear in the text.

First-use water: Potable water from an external source that can be used in any food processing operation. Examples of this type of water include wastewater, rainwater, surface water, and effluents of sewage treatment plants that are properly reconditioned to be considered potable.

Rationale: This definition could be deleted if the origin of the water is provided in "potable water".

Potable water: Water fit for human consumption which sources include wastewater, rainwater, surface water, and effluents of sewage treatment plants that are properly reconditioned to be considered potable.

Rationale: Brazil suggests including possible sources of water for treatment to obtain potable water, as established in the definition of first use. Thus, you can delete the definition of first use.

Recycled water: Water, other than ~~first-use~~ potable water or reclaimed water, which has been obtained from a step in the food production or food processing operation to be reused in the same, prior or a subsequent step of the operation, after reconditioning, when necessary.

Rationale: For consistency, in case the definition of first use is dropped.

Food hygiene system: Prerequisite programmes, supplemented with control measures at CCPs, as appropriate, that when taken as a whole, ensure that food is safe and suitable for its intended use.

Rationale: Brazil prefers that a cross reference to appropriate Codex document be inserted.

HACCP System: The development of a HACCP plan and the implementation of the procedures in accordance with that plan.

Rationale: Brazil prefers that a cross reference to appropriate Codex document be inserted.

Annex 1: Fresh Produce

[**Fresh produce:** Any fresh fruit, nuts, fungi and vegetables that are likely to be sold to consumers in a raw form, either unprocessed or minimally processed (e.g., washed, peeled, cut or otherwise physically altered from its original form but remaining in the fresh state), and that are generally considered as perishable regardless of it being intact or cut from root/stem at harvest.]

Rationale: Brazil agrees to the modifications proposed to the definition of fresh produce.

16 bis. Corrective actions should also consider the products that may have been affected by waterborne pathogen.

Rationale: Possible corrective actions to prevent contamination of water and fresh produce at primary production have been described. However, what to do with contaminated food has not been established.

Paragraph 19. A number of good agriculture practices (GAP) for irrigation might be considered:

- Establish no-harvest zones if the irrigation source water is known or likely to contain human pathogens and where failure at connections results in overspray of plants or localized flooding;
- Record the crop, date and time of irrigation, water source and any pesticides or fertilizers applied using water.
- Maintain and protect the source of the water used/stored and verify its quality.
- Where possible, avoid the use of high-risk water sources such as poorly stored rainwater, untreated wastewaters and surface waters from rivers, lakes and ponds.
- Growers should focus on the adoption of GAP to minimize and control the risk of contaminated water and not use testing as the sole method of controlling waterborne hazards.
- The type of crop (i.e. ready-to-eat or requiring cooking), timing, irrigation system, soil type and whether the irrigation water has direct contact with the edible portion of the plant should be considered by growers. If contaminated water is in contact with the edible portion of plants, the risk of contamination increases, especially if close to harvesting.
- Water spraying, i.e. misting, immediately prior to harvest presents an increased biological risk. If the soil is heavy and non-free draining, contaminated water can accumulate on the soil surface, increasing the risk of crop contamination. It is recommended to avoid ~~that~~ water spraying immediately prior to harvest.

Rationale: Editorial

Paragraph 32. If large quantities of fresh produce (hundreds of kilograms) are washed in the same volume of water (1000 L), accumulation of microorganisms occurs which favours cross-contamination between different product batches. Maintenance of residual concentration of biocides in the process water, ~~can~~ should be used ~~as processing aids~~ to maintain the microbiological quality of process water to avoid accumulation of microorganisms in the water tank and reduce cross-contamination in the washing tank.

Rationale: Brazil suggests dropping the term "processing aid" because the Codex does not have listed functions for processing aid, such as biocide.

Paragraph 30. It is recommended that the quality of the water used in packing establishments be controlled, monitored and recorded by testing for indicator organisms and/or food-borne pathogens. Since the results of such (verification) testing is not available right away, it is recommended to carry out simple complimentary operational monitoring such as rapid water quality testing by testing of turbidity, chlorine residuals or visual observation. ~~This last one is of particular importance in small-scale systems where the frequency of verification testing is typically low.~~

Rationale: Brazil prefers to quit the second part of paragraph. This sentence could bring misunderstanding to monitoring in small scale systems.

Paragraph 34. The use of biocides to maintain the microbiological quality of process water should comply with the requirements established by the competent authority and should be validated for efficacy. Biocides should never replace GHPs but be used in addition to GHPs and where necessary to minimize post-harvest cross contamination. ~~with b~~Biocide levels should be monitored, controlled and recorded to ensure the maintenance of effective concentrations. The application of biocides should be followed by rinsing as necessary to ensure that chemical residues do not exceed levels established by the competent authority. Rinsing using overhead spray is preferable, considering that ~~not by an~~ immersion tank without attention can cause cross-contamination ~~attention~~.

Rationale: Editorial. Brazil prefers to maintain paragraph 34.

Paragraph 37. Immersion of warm, whole or fresh-cut produce in cool water may induce water into the internal parts of the fresh produce. ~~and s~~Some fresh produce with high water contents, e.g. apples, celery, melons and tomatoes, are more susceptible to internalization through openings in the peel such as stem-end vascular tissue, stomata or puncture wounds. ~~I~~f the temperature of the wash water is less than the temperature of the produce, the temperature differential can force water into the produce contaminating it on the inside; it is recommended that in these cases, the temperature of the initial wash water is 10°C higher than the fresh produce, if possible.

Rationale: Editorial

Paragraph 46. Documented procedures should be developed for the washing and rinsing of fresh produce, including:

- on the use of vigorous washing to increase the chances of removing contamination if the fresh produce is not subject to bruising;
- on the frequency of water replenishment for washing and rinsing considered suitable to minimise risks of fresh produce contamination;
- on the monitoring of the water temperature during washing and rinsing, if necessary;
- on the use of a de-watering step, where possible, to remove excess water from the fresh produce, as dry produce is less likely to become re-contaminated; in such case, water should be removed gently to prevent damage to produce.

Rationale: Since in paragraph 37 it was recommended that the temperature of the initial wash had been 10°C higher than the fresh produce, if possible, for fresh produce with water contents or more susceptible to internalization, doesn't make sense procedures to monitoring water temperature during washing and rinsing for all produce.

Paragraph 47. ~~Develop documented procedures for cleaning and sanitizing of surfaces coming into contact with the fresh produce and used in washing and rinsing of fresh produce which includes:~~

~~• all washing and rinsing equipment should be hygienically designed to help ensure adequate cleaning and sanitizing;~~

~~• all equipment should be cleaned after use. Mud, soil and fresh produce debris should be removed from equipment, then it should be washed with a detergent and rinsed before a final wash with a chemical disinfectant and, where necessary, a thorough rinse with potable water;~~

~~• ancillary equipment such as knives and blades, and boots and protective clothing should be cleaned and disinfected at the end of each day;~~

~~• maximum run time, between cleaning and sanitation cycles, should be determined for each process line.~~

Rationale: Outside the scope of this document. The purpose and scope of this annex are to elaborate guidelines for the safe biological quality sourcing, use and reuse of water in direct and indirect contact with fresh produce.

Table 1

Rationale: Brazil agrees to indicate medium risk instead of low risk in case of fresh produce that is cooked or processed by the consumer or FBOs (water source: reused water untreated and surface groundwater of unknown quality).

Appendix II: Other examples of decision support system tools applied in certain parts of the world.

Rationale: The tools at appendix II can be moved to an informative document.

Annex II: Fishery Products

Paragraph 2. ~~Water is a key element in the production and processing of fishery products~~. Water can be sourced from the sea or rivers or, in the case of land-based fish farming systems, from springs, wells, rivers, lakes, or other ~~drinking~~ potable water supply systems.

Rationale: This sentence is redundant. Replace drinking to potable for document consistency.

Paragraph 6. The purpose and scope of this annex is to provide recommendations for the quality sourcing, use and reuse of water processing and preservation of fishery products for human consumption by applying the 'fit for purpose' principle and using a risk-based approach.

Rationale: To consistency with chapter WATER USED AND REUSED IN PROCESSING AND PRESERVATION. Brazil also suggests including a chapter about water used in fish farming pond.

Figure 1.

Rationale: The eWG should revise this decision tree. All options lead to Vp. Is it correct?

Figure 2.

Rationale: The eWG should revise this decision tree. If the answer to questions X and V is "yes", the arrow should lead to Microbiologically fit-for-purpose".

Figure 3.

Rationale: The eWG should revise this decision tree. Question l has no answer.

European Union

Mixed Competence

European Union Vote

In response to the request for comments, the European Union and its Member States (EUMS) would like to make the following comments.

I. General Comment

The EUMS would like to thank and congratulate Honduras, Chili and the European Union with the drafting of these guidelines.

II. Reply to the recommendations

On the general part/definitions:

- Apart from the comments below, the EUMS agree with the definitions proposed and have not identified a need for additional definition;
- the EUMS prefer cross-references to existing definitions in other standards. It avoids inconsistencies of definitions when these definitions would be updated in a future revision;
- as regards the definition of "water fit for purpose", the EUMS prefer the first options since much clearer and understandable;
- as regards "water risk assessment" or "water risk analysis", the EUMS consider that the definition refers to a risk assessment not to a risk analysis (which is broader than the proposed definition);

- as regards “active management” and “passive management”, the EUMS consider that if the figure 1 is maintained in the text, there is need to define them

On the fresh produce annex:

- the EUMS prefer to maintain the definition of “fresh produce” in Annex I since this wording is only used in this Annex and to be consistent with the approach in Annex II, containing definitions specific for that Annex; the EUMS can agree with the revised definition of “fresh produce” as currently presented in Annex I;
- the EUMS agree that the last part of paragraph 34 refers to chemical hazards (residues from biocides); however, the EUMS prefer to maintain this part; the first part of the paragraph is relevant for biological hazards (use of biocides) and it might be useful to keep recommendations on the safe use of biocides;
- the EUMS consider that the examples and decision trees are appropriate for the development of the document;
- the EUMS consider the last part of paragraph 30 useful and to be maintained, since most relevant for small-scale establishments;
- the EUMS consider that Table 1 should remain consistent with MRA series 33 provided by JEMRA.

On the fishery annex:

- The scope of the annex is appropriate, we suggest introducing a section for Water Sources like the one in Fresh Produce Annex since specific sources are used e.g. seawater.
- The Annex sufficiently describes the different types of source waters and do not need further description, especially if a new section on water sources is introduced.
- The proposed DTs are useful for the proper use of water in the process, however, considering that the definition of fishery products includes “any species of fish, including crustaceans, molluscs, gastropods, echinoderm, or part of them intended for human consumption” it should be appropriate the introduction of DTs also for molluscs, gastropods and echinoderm.
- We encourage the introduction of a specific section dedicated to the used of water for molluscs, gastropods and echinoderms. For example, molluscs are filter feeders which have tendency to accumulate bacteria, requiring specific attention to the water use.

Furthermore, pending the resolution of the above issues and pending the outcome of the discussions in the physical working group and at CCFH53, the EUMS may support advancing the draft, including Annexes I and II to step 5.

The EUMS also support the establishment of an EWG for the finalisation of the current draft guidelines and the development of an Annex on the use and re-use of water in the dairy sector.

III. Specific comments

General part

Several paragraphs

Reference is made to “food hygiene systems or HACCP-systems”. In the understanding of the EUMS, a HACCP system is part (when appropriate) of the food hygiene system. The wording “or HACCP system” can therefore be deleted.

In certain paragraphs “microbiological contaminants” is used, in other “microbiological hazards”. The EUMS propose to use “microbiological hazards” throughout the draft. Rationale: consistency.

Paragraph 16, first sentence

“~~Like food safety management, water safety management~~ **Like food hygiene systems, water hygiene systems** should be risk- and evidence-based,….” Rationale: consistency of terminology with the wording used in the General Principles of Food Hygiene.

Paragraphs 17, last sentence

The EUMS propose to replace the last sentence by “**The water safety plan should be integrated in the FBO’s food hygiene system**”. Rationale: the current final sentence is confusing: in the understanding of the EUMS, the first part of this paragraph is/describes the “water safety plan”, which should be part of the overall food hygiene system. The proposed sentence better reflects this.

SECTION 2: Food Hygiene Systems

The EUMS propose to amend the title into "SECTION 2: **Water Safety Plans**"

Rationale: the whole section is on the safe use of water (water safety plan), being part of/integrated in the food hygiene systems. Other parts of the food hygiene system are not within the scope of this section.

Annex I

Paragraph 5

The second sentence may be deleted. Rationale: repetition and fully elaborated in Paragraph 6.

Paragraph 48

The EUMS propose to amend the 7th bullet as follows: "physiological characteristics of the fresh product (such as the peel and whether the produce would be subject to infiltration **of water in the produce**);" Rationale: clarification what infiltration means in this context.

Paragraph 63 last bullet

The EUMS propose to replace the reference to paragraph 60 at the end by a reference to paragraph 62. Rationale: the irrigation system or mitigation options are scored in that paragraph.

Annex II

Definitions

The EUMS propose the following change to the definition of fishery products: "Fishery products: Any species of fish, including crustaceans, molluscs, **marine** gastropods, echinoderm, **tunicates** or part of them intended for human consumption." Rationale to differentiate from terrestrial gastropods and for completeness.

India

Appendix 1, Introduction, Para 2, last line

The last phrase may be deleted as follows:

Noting that the availability…….. in a way that the safety of food is ensured~~, while simultaneously avoiding unnecessary consumption, waste, and the environmental impact~~.

Rationale

This document should not recommend practices that do not relate to protecting the health of the consumers and ensuring fair practices in the food trade, which is the mandate of Codex.
The last phrase appears to recommend practices related to controlling consumption, waste and environmental impact which, though good, are not in the mandate of the Codex Alimentarius Commission and hence proposed to be deleted.

Appendix 1, Introduction, Para 4

The sentence may be amended as follows:

"Requirements for ~~water~~ **food** safety should therefore be considered in context, considering the purpose of the water use, the potential hazards associated with the water use, and whether there is any subsequent measure to decrease the potential for contamination along the food chain."

Rationale

There is no definition of water safety while food safety is a well-defined term in Codex and is appropriate in the context here.

Appendix 1, Introduction, Para 8

The paragraph may be modifiedby adding thefollowing sentenceat the end of the paragraph:
"Associated Annexes provide product-specific guidelines for the safe sourcing collection, storage, treatment, handling, distribution, use, and reuse of water in both direct and indirect contact throughout the food chain. The annexes also provide examples such as Decision Tree Tools (DTTs) that can help to determine if water

is fit for purpose. **These guidelines, however, are applicable equally to foods not covered by these Annexes".**

Rationale

To prevent reader from interpreting that the guidance is applicable only to the products covered by the associatedAnnexes.

Appendix 1, Purpose and Scope, Para10

The sentence may be amended as follows:

"These guidelines provide a framework of general principles and examples for making risk-based decisions for ~~**fit-for-purpose**~~ water to be sourced, used, and reused across the primary production and processing of relevant commodities **following a fit-for-purpose approach**. These guidelines do not consider ~~**chemical hazards,**~~ water for direct animal and human consumption, or the use of water in households."

Rationale

Read as written at present, the text conveys that fit-for-purpose water needs to be sourced, which may not always be the case.
The document needs to consider all hazards in the context of fit-for-purpose water.

Appendix 1, General Principle iii

The sentence may be amended as follows:

"Water, if reused, should be treated/reconditioned and validated to reduce or eliminate microbiological hazards to an acceptable level according to its intended use."

Rationale

This document should not recommend practices that do not relate to protecting the health of the consumers and ensuring fair practices in the food trade, which is the mandate of Codex.Encouraging reuse of water is not the mandate of Codex.

Appendix 1, General Principle iv

The sentence may be amended as follows:

"In all situations, water sourcing, use, and reuse **based on fit-for-purpose approach** should be part of an FBO´s food hygiene system or HACCP system."

Rationale

For Clarity

Appendix 1, General Principle iv

The sentence may be amended as follows:

"In all situations, water sourcing, use, and reuse **based on fit-for-purpose approach** should be part of an FBO´s food hygiene system or ~~HACCP system~~ **good hygienic practices (GHP)**."

Rationale

Depending on the nature of the food, food process, and the potential for adverse health effects, to control hazards it may be sufficient to apply GHPs, including, as appropriate, some that require more attention than others, as they have a greater impact on food safety. When the application of GHPs alone is not sufficient, a combination of GHPs and additional control measures at CCPs should be applied.Both GHPs and HACCP applied together form the Food Hygiene System as per the definition of these terms in the RCP-1. However, GHPs alone can be adequate in certain circumstances (Principle iv in RCP-1 reproduced above above) but HACCP can never be applied without GHPs that form its pre-requisite programme.

Therefore, a separate reference to HACCP is not necessary (it is covered by a reference to Food Hygiene System) but the same is required for GHPs to cover the cases when GHPs alone are required to be applied.

Appendix 1, Definitions, Para 13

Water fit for purpose: We support Option 1 for the definition of "Water fit for purpose"

Rationale

The definition in option 1 is more elaborate and captures several important elements in the context.

Appendix 1, Definitions, Para 13

HACCP system- Definition is not required

Rationale

A separate definition of HACCP is not necessary (it is covered by a reference to Food Hygiene System)

Appendix 1, Definitions, Para 13

Water risk assessment or Water risk analysis: None of these two options are acceptable. There is no need of these new terms.

Rationale

The terms risk assessment and risk management are well defined and understood. These terms can be applied in the context of any food such as milk, fish, meat, water etc. Water is included in the Codex definition of food.

Appendix 1, Definitions, Para 13

Active management and Passive management: None of these two options are acceptable. There is no need of these new terms.

Rationale

These terms are irrelevant and have been used only in the DTT (Figure 1). It may be recalled that CCFH did not agree to terms such as PRP and oPRP, which have connotations similar to active and passive managment, during revision of the RCP-1.

Appendix 1, Definitions, Para 13

Clean water: Definition is not required

Rationale

The term clean water as proposed to be defined has the same meaning as water fit for purpose. Two different terms for same purpose are not needed.

Appendix 1, Para 2, last line

The definition may be amended as follows:

First-use water : Potable water from an external source that can be used in any food processing operation. Examples of this type of water include wastewater, rainwater, surface water, ~~**and**~~ effluents of sewage treatment plants **etc.** that are properly reconditioned to be considered potable.

Rationale

To keep the list of examples open.

Appendix 1, Section 1

The title may be amended asfollows:

"~~WATER~~ RISK ASSESSMENT AND MONITORING"

Rationale

The terms *risk assessment* and *management* are well defined and understood. These terms can be applied in the context of any food such as milk, fish, meat, water etc. Water is included in the Codex definition of food.

Appendix 1, Para 14

~~**Water**~~ Risk Assessment [Analysis] (WRA) and monitoring are overarching approaches that apply to all sectors and at multiple steps in the food chain to determine fit-for-purpose water sourcing, collection, storage, treatment, handling, use and reuse.

Rationale

The terms risk assessment and risk management are well defined and understood. These terms can be applied in the context of any food such as milk, fish, meat, water etc. Water is included in the Codex definition of food. Also, there is no definition of water safety while food safety is a well-defined term in Codex and is appropriate in the context here.

Appendix 1, Para 15

Sentence may be amended as follows:

~~**W**~~RAs can be used to set target objectives for water sources and treatments for achieving public health outcomes, water quality values, performance targets (e.g. food safety objectives, performance objectives), acceptable levels of risk, and treatment process efficacies. Monitoring is used to generate data for the development of a risk profile or to inform ~~W~~RA and can be used to inform risk management by identifying safety issues that need to be addressed in a food hygiene system to ensure the safety of water and, therefore, the safety of foods.

Rationale

The terms risk assessment and risk management are well defined and understood. These terms can be applied in the context of any food such as milk, fish, meat, water etc. Water is included in the Codex definition of food. Also, there is no definition of water safety while food safety is a well-defined term in Codex and is appropriate in the context here.

Appendix 1, Para 16

The sentence may be amended as follows:

~~**"Like food safety management, water**~~ **Food** safety management **in the context of water** should be risk- and evidence-based, with reduction measures implemented within the framework of an overall water safety plan or a structured food hygiene system or ~~HACCP system~~ **good hygienic practices (GHP)** and with verification and monitoring activities in place to ensure the plans/systems are operating as expected

Rationale

Introducing of new terms such as *water safety management* is confusing and doesn't add value to the document. What is actually being done through this document is application of food safety management in the context of water. It should be so reflected in a simple manner.

A separate reference to HACCP is not necessary (it is covered by a reference to Food Hygiene System).

Appendix 1, Para 17, last line

The sentence may be amended as :

"In any case, this should be included in an FBO´s food hygiene system **and** water safety plan,~~**orHACCP system. "**~~

Rationale

A separate reference to HACCP is not necessary (it is covered by a reference to Food Hygiene System).

Appendix 1,Para 18

The sentence may be amended as follows:

"Monitoring must be ~~**able**~~ **designed** to detect potential deviations and provide information in time for corrective actions to be taken such that unsafe foods are not placed on the market."

Rationale

For more clarity.

Appendix 1, Para 19. Bullet no 3

The sentence may be amended as follows:

"Quantitative Microbial **~~Water~~** Risk Assessment (QMWRA) (most comprehensive) – a mathematical modeling approach that can be used for estimating risks related ……..."

Rationale

The terms risk assessment and risk management are well defined and understood. These terms can be applied in the context of any food such as milk, fish, meat, water etc. Water is included in the Codex definition of food. Also, there is no definition of water safety while food safety is a well-defined term in Codex and is appropriate in the context here.

Appendix 1, SECTION 2, Para 20, last sentence

Sentence may be modified as:

"They should be risk and evidence-based, with control or mitigation measures implemented within the framework of an overall water safety program or a structured food hygiene **~~or HACCP system~~** with verification and monitoring to ensure that it is operating as expected."

Rationale

A separate reference to HACCP is not necessary (it is covered by a reference to Food Hygiene System).

Appendix 1, Para 21

The sentence may be amended as follows:

"The development of such plans requires complete knowledge of the water **sourcing and handling** system, the diversity and magnitude of the hazards that may exist, and the capacity of existing processes and infrastructure to address and control risks."

Rationale

For more clarity. Otherwise the term *water system* may not be clear.

Appendix 1, Para 22

The sentence may be amended as follows:

"As part of the food hygiene **~~or HACCP system~~**, all water **sourcing and handling** systems should be mapped in a process flow diagram and evaluated in the hazard analysis. Water **sourcing and handling** systems also require identification of potential hazards (microbiological, physical agents) **~~with the capacity to cause damage to water safety~~**and their sources and **mitigation methods during** ~~should also address safe~~ water sourcing, use or reuse, when developing and implementing the **food safety** plan. Additional factors to be considered could include water storage/distribution, including hygienic design, and the need for special expertise."

Rationale

For more clarity. Otherwise the term *water system* may not be clear.A separate reference to HACCP is not necessary (it is covered by a reference to Food Hygiene System).

Appendix 1, Figure 1

The text in the boxes needs to be suitable amended to avoid use of the terms active and passive management.

Rationale

These terms are irrelevant and have been used only in the DTT (Figure 1). It may be recalled that CCFH did not agree to terms such as PRP and oPRP, which have connotations similar to active and passive management, during revision of the RCP-1

Annex 1, Para 34

Maintain texts referring to chemical hazards or their control

Rationale

It is important to mention about the chemical hazards in this context for ensuring safe use of biocides.

Annex 1, Purpose and Scope

"The purpose and scope of this annex is to provide recommendations for the ~~**quality**~~sourcing, use and reuse of water processing of fishery products for human consumption by applying the 'fit for purpose' principle ~~**and using a risk-based approach."**~~

Rationale

The term 'fit for purpose' covers all the aspects, so phrases, 'quality' and ' risk based approach' is not required in the sentence.

Annex I, Para 50, Table 1

Product categories mentioned in the table are **"Ready to eat"** and **"Cooked or processed by consumer or a food business operator"**. This categories need to be reclassified as given below:

Rationale

This categories need to be reclassified like Ready to eat, ready to cook, raw unprocessed etc. Sometimes products cooked by food business operators are also considered as ready to eat food. While some processed products include raw food which may or may not undergo cooking/sterilization process later on.

1) **Ready to eat product** – water (either reused water untreated or surface or ground water of unknown quality) which doesn't come in contact with edible portion may be placed under**low riskcategory**

Rationale

In this category, ready to eat food doesn't come in contact with water, and can be placed in low risk.

2) **Cooked or processed by consumer or a food business operator**: Water (either reused water untreated or surface and ground water of unknown quality) which comes in contact with food can be placed under **medium risk category**

Rationale

If the product gets contaminated with any toxin forming bacteria, the toxin formed cannot not be removed by further cooking/processing.

Annex I, Para 58, Decision tree, Point no 2

It is mentioned that "No water testing required" for public/municipal water (drinking).

India suggests that **water testing is required** for public/municipal water also.

Rationale

Water testing is required as there could be contamination due to leakage, breakage or any other insanitary condition. Public/municipal water comes through a reservoir. Even a sump in one food processing facility has to be treated a reservoir.Frequency of testing for all parameters may be at least once in two years and whenever the source of water is changed. As per Council Directive 98/83/EC of 3 November 1998, establishments approved for export to EU shall test water used for processing and ice production approved lab at least once in two years and whenever the source of water is changed.

Annex I, Para 58, Decision tree, Point No. 3

Frequency of water testing has to be defined in the case of Medium and high frequency testing.

Rationale

Systematic and pre scheduled testing will help the smooth functioning of the system. In case of any deviation occurs, it will help to verify the system and the corrective action can be done accordingly.

Annex 2, Definitions

The definition may be amended as follows:

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

Rationale

(i) The term ***"gastropods"*** may be omitted as the term "molluscs" covers *gastropods* also

. (ii) Consider adding **"ascidians"** or sea squirts which are a delicacy in East Asia

Annex 2, Definitions

The definition may be amended as follows:

Processing facilities: A facility where harvested fishery products are processed/ **preserved ~~graded~~**, and packed for further transportation and consumption

Rationale

The processing activity is followed by a preservation step such as chilling, freezing, canning or drying prior to packaging step.

Indonesia

General Comment

Indonesia would like to express her appreciation to Honduras, Chile and the European Union for preparing the revised proposed draft guidelines for the safe use and reuse of water in food production and processing, taking into consideration comments submitted in the electronic working group.

Indonesia generally agrees with most parts of the proposed draft guidelines with some specific comments as follows.

Specific Comments:

DEFINITION

- **Definition of 'water fit for purpose'**

Indonesia prefers to choose Option 1 for the definition of water fit for purpose.

Option 1: ~~[~~Water fit for purpose~~]~~: water that is determined to be safe for an intended purpose through an assessment of potential hazards, treatment options and their efficacy, control measures, history of use, and the end use of the food product.~~]~~

Rationale:

The proposed definition in Option 1 is more completed and detailed to explain the condition and criteria 'for water fit for purpose'.

- **Definition of Water risk assessment/water risk analysis**

Indonesia prefers the term "water risk assessment" rather than "water risk analysis" to be used in this document.

Rationale:

Considering that the scope of risk analysis is wider than assessment and should include risk communication step, Indonesia is of the view that the proposed definition is more appropriate for 'water risk assessment'. As a consequence, the terms used throughout the document should be change to water risk assessment.

- **Definition of Active management and Passive management**

Indonesia is of the view that the definition for Active management and/or Passive management is no need to be included in this document.

Rationale:

Considering that these two terms are not used in the document, Indonesia is of the opinion that it is not necessary to include the definitions of these terms in the document.

SECTION 1: WATER RISK ASSESSMENT AND MONITORING

Para 14

Indonesia proposes to delete the word Analysis in the square bracket.

14. Water Risk Assessment ~~[Analysis]~~ (WRA) and monitoring are overarching approaches that apply to all sectors and at multiple steps in the food chain to determine fit-for-purpose water sourcing, collection, storage, treatment, handling, use and reuse.

Rationale:

To be consistent with title of Section 1

Annex I Fresh produce

DEFINITIONS

Indonesia proposes to open the square bracket and proposes to add the word “edible” before “fungi”.

~~[~~Fresh produce: Any fresh fruit, nuts, **edible** fungi and vegetables that are likely to be sold to consumers in a raw form, either unprocessed or minimally processed (e.g., washed, peeled, cut or otherwise physically altered from its original form but remaining in the fresh state), and that are generally considered as perishable regardless of it being intact or cut from root/stem at harvest.~~]~~

Rationale:

Indonesia believes that it is more appropriate to use the term “edible fungi” instead of “fungi” because Indonesia considers that there are several types of fungi that are not edible. In addition, it is also consistent with the other established Codex standards such as CXS 38-1981 and CXS 39-1981, both of which use the term “edible fungi”.

Morocco

Définitions :

Position nationale 12 : *Eau propre*

« Eau propre : Eau qui ne répond pas aux critères de l’eau potable, mais ne compromet pas la sécurité sanitaire des aliments selon l’usage prévu ».

La phrase “Eau qui ne répond pas aux critères de l’eau potable” n’est pas adéquate.

Proposition de définition : « Eau de mer ou saumâtre ou l’eau naturelle, artificielle ou purifiée ne contenant pas de micro-organismes ou de substances nocives ou toxiques en quantités susceptibles d’avoir une incidence sur la qualité sanitaire des produits alimentaires » ;

Position nationale 13 : *Eau adaptée aux fins prévues*

Le Maroc soutient l’**Option 1 : «** *Eau dont l’innocuité a été établie pour un usage prévu par le biais d’une évaluation des dangers potentiels, des options de traitement et de leur efficacité, des mesures de maîtrise, de l’historique d’utilisation et de l’utilisation finale du produit alimentaire* ».

Argumentaire :

Cette définition est plus correcte et apporte plus de détails.

Position nationale 14 : Option 1 : [Évaluation des risques liés à l’eau] ou Option 2 : [Analyse des risques liés à l’eau]

Le Maroc soutient **l’Option 1 : [Évaluation des risques liés à l’eau]**

Argumentaire :

L’évaluation des risques est un outil d’aide à la prise de décision.

L’évaluation des risques microbiologiques est, avec la gestion des risques et la communication sur les risques, l’une des trois composantes des processus d’analyse des risques.

Position nationale 15 : *Définition du Reconditionnement*

Le terme **reconditionnement** n'est pas adaptée pour la version française, à cet effet le Maroc propose le terme « **traitement** ».

Section 1 : Evaluation et suivi des risques liés à l'eau

Position nationale 16 : *paragraphe 19*

Le Maroc propose de remplacer le terme « **évaluation descriptive » par « évaluation qualitative »** pour être en harmonie avec les termes utilisés dans les documents du codex à savoir « Le Guide d'évaluation des risques microbiologiques dans les aliments **(ERM 36) »**

Annexe II : produits de la pêche

Position nationale 17 : *définition des installations de transformation*

Pour plus de précision et de clarté le Maroc propose les modifications suivantes :

« ~~Usine~~ **Etablissement** où les produits de la pêche **capturés** ~~récoltés~~ sont **manipulés, conservés,** transformés, **triés,** ~~classés~~, **conditionnés** et emballés pour être transportés puis ~~consommés~~ distribués ».

Position nationale 18 : *paragraphe 11*

« Dans l'industrie de production et de transformation du poisson/des mollusques et crustacés, voici quelques exemples d'utilisation de l'eau :…. »

Le Maroc propose d'ajouter les deux exemples suivants qui sont d'utilisation très fréquents et doivent être cité :

- Pour conserver les produits la pêche
- Pour la production de la vapeur.

Position nationale 19 : *les figures*

Le Maroc demande à référencer la source des figures qui sont intégrées dans cette annexe car ils comportent plusieurs discordances. A cet effet le Maroc propose de réévaluer les arbres de décision, puisque par exemple, le premier arbre mène à la même conclusion, quelle que soit la direction choisie.

Avancement du document :

Le Maroc est favorable pour l'avancement des différentes parties du document dans la procédure par étapes **à l'exception de l'annexe sur les produits de la pêche** qui nécessite encore du travail et d'examen avant son avancement à l'étape suivante.

Norway

We have inserted our views/answers to the questions posed in the CL:

Comments to questions in CX/FH 22/53/6 rev, ewg report:

a) **Definitions in the General Section:**

- Whether there is agreement with the definitions currently included in the document;

Reply:

Overall, we find the definitions in the General Section sufficient and appropriate for the purpose

- Whether certain definitions should be retained in the document (e.g., HACCP system, food hygiene system) or rather insertion of a cross-reference to the appropriate Codex documents; CX/FH 22/53/6

Reply:

Definition for **HACCP system** and **Food hygiene system:** We would prefer using cross references to the appropriate Codex document (CXC 1-1969), thus to avoid any unintended differences.

- To indicate a preference for option 1 or 2 for the definition for water fit for purpose;

Reply:

Definition for water fit for purpose:

We would prefer option 2: *Water which is determined to be safe for an intended purpose through a water risk assessment,* as we find it appropriate.

- To indicate a preference for the term water risk assessment or water risk analysis; and

Reply:

We prefer the term water risk assessment, which we find more appropriate for the act carried out.

b) **As regards the fresh produce annex specific input is required in order:**

- To determine whether to maintain or eliminate texts referring to chemical hazards or their control, considering that it is out of the scope of the document (e.g. paragraph 34);

Reply:

We suggest eliminating texts referring to chemical hazards, considering that it is outside the scope of the document.

c) **As regards the fishery sector annex specific input is required in order:**

- To determine whether the proposed DTs are useful for the proper use of water in the process

Reply: We find the DTs useful and support keeping them in the document. When using *Vibrio parahaemolyticus* as an example, we think however that the document should reflect that this risk may be of various relevance. In areas with low seawater temperature pathogenic Vibrio is not a particular challenge. We suggest adding *in some waters* in the description of the DTs in Figure 1 and 2. The wording would then read "…… using *V. parahaemolyticus* (Vp) **in some waters** as an example of a fish borne pathogen."

Comments to CX/FH 22/53/6 Annex II Fishery Products:

Paragraph 2: We suggest adding the word "sea" in the list of sources from which water used in land-based fish farming can be taken. The wording would read: "Water is a key element in the production and processing of fishery products. Water can be sourced from the sea or rivers or, in the case of land-based fish farming systems, from **sea**, springs, wells, rivers, lakes, or other drinking water supply systems."

Rationale: Water from the sea is used also in land-based fish farming systems.

Paragraphs 13 and 16: We suggest replacing the word evisceration with gutting. The process described as evisceration in the relevant paragraphs does not necessarily include the removal of gills.

Rationale: Gutting is a commonly used term, both in this document and in the Code of practice for fish and fishery products (CXC 52-2003) and includes removal of internal organs. If one wants to underline that gills also should be removed, the term "gutting and gilling" would be appropriate.

With the suggested changes, the need for a definition of evisceration should be considered, as it may seem to be redundant.

Philippines

General Comments:

Comment Type	Category	Proposed Change	Comment
General	Substantive	N/A	The Philippines supports the proposed draft Guidelines as presented in Appendix I: The General Section and the annexes on Fresh Produce and Fishery Sector with some specific comments.

Specific Comments:

Comment Type	Category	Proposed Change	Comment
Appendix 1, Definition	Substantive	N/A	The Philippines agrees with the definitions currently included in the document including the definitions that are retained in the document (e.g., HACCP system, food hygiene system) and that there is no need for any additional definition in the document.
Appendix 1, Definition, Paragraph 13	Substantive	~~[~~Water fit for purpose: water which is determined to be safe for an intended purpose through a water risk assessment. ~~]~~	The Philippines supports Option 2 for the definition of Water fit for purpose. Rationale: The definition is simpler and concise. Option 1 explains the process of water risk assessment which may be not relevant since there is another definition entry for water risk assessment.
Appendix 1, Definition, Paragraph 13	Substantive	Water Risk Assessment	The Philippines supports the use of Water Risk Assessment throughout the document. Rationale: The definition stated is consistent with the definition of Risk Assessment based from CAC procedural manual.
Annex 1, Fresh Produce, Definition	Substantive	N/A	The Philippines supports the proposed modifications to the definition of fresh produce and agrees to put the definition of Fresh produce in Annex 1 instead of in the general part.
Annex 1 Examples and Decision Trees	Substantive	N/A	The Philippines agrees that the remaining examples and decision trees are appropriate for the development of the document as these are practical tools that could be used for decision-making based on risk. However, the Philippines would like to clarify the decision tree in Illustration 1 (page 21) which mentions both chemical and biological hazards. Are chemical hazards not part of the scope of this document?
Annex 2 Purpose and Scope	Substantive	N/A	The Philippines supports the stated scope of the annex on Fishery Products.
Annex 2 Examples of Decision Trees	Substantive	N/A	The Philippines finds the proposed decision trees as useful and appropriate for the development of the document.