

European Union comments

CODEX COMMITTEE ON FOOD HYGIENE

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Agenda Item 9: Discussion paper on principles for the safe use of water in food processing (CX/FH 19/51/9)

***Mixed Competence
European Union Vote***

The European Union and its MS (EUMS) would like to thank Honduras as chair and Chile, India, Denmark and the European Union as co-chairs for the development of this discussion paper.

The EUMS recognise that water can be an important source of contamination of food and therefore can agree on the launch of new work by CCFH on the safe use of water in food production.

With regard to the questions raised by the chair and co-chairs to CCFH; EUMS would like to express the following views:

- The EUMS can agree with the new work proposal for the development of Guidelines for the safe use and reuse of water in food production. It should cover food production as a whole and should not be limited to (post-harvest) food processing. The report of the Joint FAO/WHO Expert meeting entitled “Safety and Quality of Water Used in Food Production and Processing” (JEMRA report) justifies such a broad approach (need to include primary production) in particular in certain sectors such as the fresh produce one. Considering the increasing global need to reuse water and the never finalised 1999 Proposed Draft Guidance for the Hygienic Reuse of Processing Water in Food Plants, guidelines with regards to reuse of water should be included in the scope of the new work.
- The EUMS would welcome the consideration of an additional Annex on the use and reuse of water in the dairy sector.
- With regard to the structure, the EUMS can support general guidance for the safe sourcing, use and reuse of water in food production as indicated in the Discussion Paper. In line with the JEMRA report, indicating the need for a sectorial approach, sector specific annexes should be added. Since there is a need for a step by step approach based on priorities, the EUMS can support Annexes on the fresh produce

and fishery sector, to be included in an initial draft. The EUMS would however like some clarification on Paragraph 17, third bullet, of the discussion paper as regards risk-based approaches, including decision trees. From the JEMRA report, the EUMS understand that these approaches should be sector specific and therefore suggest that they are included in sector specific Annexes (as referred to in Paragraph 17, second bullet).

- The EUMS can also support asking JEMRA to further develop examples of microbiological criteria for water use and reuse in specific sectors.

The EUMS suggest updating the Project Document to reflect the outcome of the discussions at CCFH51 and to create an electronic working group to start the drafting of the proposed Guidelines.