

21/12/2021

CODEX COMMITTEE ON FOOD HYGIENE
(Fifty second Session)
Virtual, 28 February 2022 and 1, 2, 3, 4, 9 March 2022

European Union Comments on

Agenda item 8:

**Proposed draft Guidelines for the safe use and re-use of water in food
production (CX/FH 22/52/8)**
(Reply to CL 2021/64/OCS-FH)

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 Comments

The EUMS would like to thank and congratulate the chairs for this new version, the progress made and the efforts made to address comments made.

In reply to the request for input, the EUMS would like to express the following positions:

- a) The EUMS prefer the term “potable water” since most widely used in Codex texts and JEMRA reports.
- b) As regards the Fresh Produce Annex:
 - Despite a certain agree of overlap with CXC 53-2003, the EUMS prefer to keep the paragraphs 5 to 36 since it allows to develop a comprehensive guidance document. In addition, this Annex focusses and goes more into detail in the management of biological hazards. In addition, the rounds of consultation resulted in a lot of suggestions to improve the wordings of these paragraphs.
 - The EUMS find the provided examples useful and the decision tools appropriate.
 - The EUMS can support a request to FAO/WHO to validate the examples and if more concrete recommendations on thresholds and sampling frequencies can be considered. Alternatively to a request for recommendations on thresholds and sampling frequencies, a number of examples (in addition to one provided), could be provided based on input from members.
- c) As regards the Fishery Products Annex:
 - As regards definitions: see specific comments
 - The EUMS consider that input from the JEMRA expert report is essential to finalise this Annex. The EUMS encourage JEMRA to proceed with its work and

make the outcome as soon as possible available at least for the chairs of this draft guidance.

Comments relevant for the whole document:

- Consistency should be ensured as regards
 - “decision tree tools (DTT)” versus “decision tools (DT)” versus “decision support systems (DDS) tools”; to note that “DT” is also used for “decision tree”.
 - “biological” versus “microbiological”. Considering the scope is broader than microbes, “biological” seems the correct wording.

II. Comments on specific sections:

Title:

It can be considered to better reflect the scope of the guidelines e.g. by referring specifically to biological safety.

Introduction:

Paragraph 2: The meaning of the last sentence is quite repetitive with the preceding one and therefore they could be merged. Possible redrafting: “Consequently, it is highly desirable to minimize water use, reduce its waste, and reuse water as much as possible. ~~For this reason,, water in food production should be managed~~ **while managing it** in a way that the safety of food is ensured, ~~while simultaneously avoiding unnecessary consumption, and waste and their associated costs.~~”

Paragraph 4: Propose to delete this paragraph as the first two sentences seem to repeat paragraph 1 and the last ones are repeated in paragraph 5.

Paragraphs 6-7: The messages given in these paragraphs seem to be largely covered by other paragraphs. These paragraphs could therefore be simplified.

Objectives, Purpose and Scope:

The purpose and the scope seem to largely repeat the objectives. It is proposed to refer only to the “scope” as title of paragraph 12, being microbiological safety of use and re-use of water in food production. It is proposed to replace the last sentence of paragraph 12 by “**These guidelines do not consider water for direct animal and human consumption, nor use of water in households.**”

Use:

Paragraph 13: only the first sentence is on the use. It is proposed to delete the rest of the paragraph whose content is also addressed elsewhere in the draft.

General Principles:

Note that this section is numbered differently from the rest of the draft.

It is proposed to reword point iv as follows: “Re-use of water **should be encouraged but** should not introduce....”

Definitions:

“Reused water” and “recycled water” are two definitions which seem very close to each other. The difference should be clarified better or it should be considered to use one single definition.

Section 1: Risk assessment and Monitoring:

No comments

Section 2: Food Safety Management Programmes:

Paragraph 19 (end): “... should be part of FBO’s Good Hygiene Practices and HACCP system, if relevant.” Alignment with wording of the General Principles of Food Hygiene and recognising that safety of water is not always part of the HACCP system.

Paragraph 23: this paragraph also refers to chemical and physical agents which creates confusion on the scope. An option could be to refer only to microbiological hazards in this paragraph, but to add an additional paragraph worded as follows: “**Biological water safety risk management should be developed, while considering at the same time the risk from potential chemical and physical hazards.**”

Section 3: Decision Support Systems:

No comments

Annex I Fresh Produce:

At several occasions: replace “fresh fruits and vegetables” by “fresh produce” for consistency purposes.

Paragraph 3: Replace “Good Hygiene Practices” by “Good Hygiene Practices (GHP)” since this acronym is further used in the draft.

Paragraph 19, introductory sentence: replace “good agriculture practices” by “Good Agriculture Practices (**GAP**)” since this acronym is further used in the draft.

Annex II Fishery Products:

Definitions

- **Fishery products:** the first definition is preferred since the second one includes aquatic reptiles which would contradict the referred definition of “fish” in CXC 52-2003.
- **Harvesting:** the first definition, included in CXC 52-2003, is preferred and it is proposed to include the following in bold: Operations involving taking the fish from the water **for the purpose of food production.**
- **Fit for purpose water:** It is considered that there is no added value in introducing a definition in Annex II since a definition is provided in the main document.