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## ANALYSIS OF AGENDA ITEMS IN PREPARATION FOR THE 53<sup>rd</sup> SESSION OF CODEX COMMITTEE ON FOOD HYGIENE (CCFH53)

*November 29 – December 2<sup>nd</sup> and December 8<sup>th</sup>, 2022*

*San Diego, California, United States*

### AGENDA ITEM 6

#### *Proposed Draft Guidelines for the Safe Use and Reuse of Water in Food Production and Processing at Step 4*

#### Objectives

This document offers an analysis of agenda items to support participation to the 53<sup>rd</sup> session of the Codex Committee on Food Hygiene (CCFH53), taking place in November 2022. The document is intended for possible use by the Codex communities of practice promoted by [GForSS](#) and [PARERA](#), as part of their contribution to enhancing awareness and supporting effective participation in international food standard setting meetings (Codex meetings) by representatives from members and observers, in particular in **Arab Region**.

The analysis provided in this document offers a factual review of agenda items, their background and a discussion of some considerations. This analysis is indicative in nature and does not represent an official position of the organizations mentioned above ([PARERA](#) and [GForSS](#)), their membership or their management.

This analysis is prepared as part of the **Codex Initiative for the Arab Region: Arab Codex Initiative**, implemented by [PARERA](#) and [GForSS](#), hosted and coordinated by the [Arab Industrial Development, Standardization and Mining Organization \(AIDSMO\)](#), and funded by the US Codex Office, US Department of Agriculture.

*\*It is important to note that experts – members of the Expert Working Group (EWG) – do not represent the organizations and / or jurisdictions to which they are affiliated. The selection and participation in the EWG proceedings is based on each expert's own credentials and experience which should not be misconstrued as the country's / delegation's / organization's position to which they belong.*

## Agenda Item 6: Proposed Draft Guidelines for the Safe Use and Reuse of Water in Food Production and Processing at Step 4

### Document

- ❖ CX/FH 22/53/6

### Background

CCFH51 agreed to take on new work on Guidelines for the Safe Use and Reuse of Water in Food Production, and an EWG chaired by Honduras was established. A draft was started but it was indicated that scientific advice from JEMRA was essential for the development of the guidelines. CCFH52 did not discuss the draft guidelines but provided feedback on specific terminology and requested scientific advice from JEMRA. It was agreed that a Physical Working Group would meet in conjunction with CCFH53 to consider comments received at Step 3.

The EWG was formed by participants from 35 Codex Members and 7 Observers. The draft presented in Appendix I of CX/FH 22/53/6 has been through **one round of comments** (General Section: comments from 16 countries and 2 observers; Fresh Produce Annex: comments from 13 countries; Fishery Products Annex: comments from 11 countries), which were addressed by the Co-Chairs. Bilateral meetings with JEMRA were also conducted. A third Annex, on dairy products, could be developed by an EWG if approved at CCFH53.

### Comments

Water, and particularly potable water, is a limited resource in the Arab region. The development of a Codex guidance as presented in Appendix I of CX/FH 22/53/6 is of **great need**. In particular, the application of a risk-based approach to the safe use and reuse of water (Para 7) is welcomed and would allow for an efficient use of this valuable resource. However, enhanced guidance on the steps and structure of this risk-based approach as well as an on the fishery products annex would strengthen the document.

Specific comments on the draft presented in Appendix I of CX/FH 22/53/6 include:

- ❖ Para 13:
  - Options being Considered:
  - 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.]
  - Option 2: [Water fit for purpose]: water which is determined to be safe for an intended purpose through a **water risk assessment.**]
  - Our expert team considers Option 2 to be more precise, however, it would need to be coupled with an enhanced definition of “water risk assessment” and “Water risk assessment” seems more appropriate than “water risk analysis” in this context, since the results of this assessment would then be used to inform risk management decisions (e.g., as noted in Para 15) and likely also risk communication.
  - An enhanced definition of “water risk assessment” should include the steps / structure used in this process and could be combined with the definition of “risk assessment” currently in the draft, if all these steps (i.e., hazard identification, hazard characterization, exposure assessment, risk characterization) are indeed referred to in the rest of the document – which is currently not the case.
- ❖ Other definitions that could be included, which correspond to terms used in the document include: risk profile (Para 15), passive management (Figure 1), active management (Figure 1), fit for purpose.
- ❖ Para 17: “appropriate parameters” could be more precise or include more guidance, as provided for the frequency of monitoring and verification.
- ❖ Para 19: could clarify that this document only discusses the 1<sup>st</sup> and 2<sup>nd</sup> bullet points, and could add a reference for the 3<sup>rd</sup> bullet point for readers interested in conducting a QMWRA.
- ❖ Para 22: chemical hazards are out of the scope of this document; however, they could be mentioned here along with microbiological and physical hazards.
- ❖ Para 23: an example of such a matrix or a reference where such an example is provided would be useful.

## Annex 1 Fresh produce

- ❖ This Annex is very useful and informative. The sections on “Water for irrigation (including greenhouses)” and “Harvest and Post-Harvest use of water – General” are very clear.
- ❖ Para 34 raises a very important point. In the Arab region, however, regulatory requirements for the use of biocides are not always available.

Para 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 biocide levels 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 using overhead spray, not by an immersion tank without cross-contamination attention.

- ❖ Para 51: consumption data and pathogen transfer rates from water to produce should be mentioned, as they are essential for accurate quantitative risk assessment. This could be achieved through citing a Codex document or other reference on quantitative microbiological risk assessment.
- ❖ Para 58 (Figure):
  - Question 1, answer = Yes: should clarify that no water testing is required provided that the water used is fit for purpose.
  - Need to define “FFV” (Fresh Fruit and Vegetables)
  - Question 2, answer = Yes, water source = (treated) wastewater: need to provide direction for cases where there are no national standards.
- ❖ Para 63, 2<sup>nd</sup> and 3<sup>rd</sup> bullet points refer to mitigation options in Para 60 – However, there are no mitigation options listed in Para 60.

## Annex II Fishery products

This Annex is relevant and necessary; however, it could be further enhanced. For example, it mainly focuses on processing, but water use and reuse in other contexts (e.g., aquaculture, as noted in Para 4) should also be addressed.

- ❖ Para 12: it would be important to provide more guidance on the “risk-based approach”
- ❖ Para 21, Figures 1-3: the information presented in the decision trees and accompanying text is useful and needed; however, clarity could be improved both in the graphics as well as in the way the decision tree is explained in the text. Perhaps most of the information could be incorporated within the decision trees with only brief text explanations.
- ❖ Para 22, 3<sup>rd</sup> bullet point: it is not clear **how the risk assessment should be conducted**. If this is not to be included in the scope of the document, adding an external reference could be useful.
- ❖ Para 23: could include more guidance on what is required for validation.

## Recommendations

Based on the evaluation of the Arab Codex Initiative Expert, while the draft text is taking shape, it is not at a stage where it would qualify for adoption as a draft standard at Step 5.

More discussions may still be warranted during the committee meetings.

Unless such discussions happen thoroughly during the upcoming session, it is recommended that the proposed draft (Appendix I of CX/FH 22/53/6) remains at Step 4 for further discussions at CCFH.