



Guide to Good Hygienic Practices for Packaged Water In Europe



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INTRODUCTION

Regulation EC 852/2004 of 29 April 2004 on the Hygiene of Foodstuffs lists a set of obligations for food business operators, including compliance with the general hygiene provisions laid down in Annex I, and the requirement to establish implement and maintain a permanent procedure or procedures based on the seven HACCP principles.

With regards to the "Guides of Good Hygiene Practice", the regulation supports the development of national guides to good practices (Article 8) and of "Community Guides" (Article 9).

The European Federation of Bottled Waters⁽¹⁾, representing the interests of all types of packaged waters across Europe, decided in July 2007 to develop a *Guide to Good Hygienic*

Practices for Packaged Water in Europe. This document was developed in accordance with Article 9 of Regulation EC 852/2004 and the EC Guidelines for the development of community guides to good practice of hygiene. The document also integrates the requirements described in the publicly available specification (ISO/TS 22002-1:2009) published by the British Standard Institution (BSI). This document specifies requirements for prerequisite programmes to assist in controlling food safety hazards.

This Guide does not preclude from preparing guides by national food and beverage associations.

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(1) The European Federation of Bottled Waters (EFBW) is a non profit trade association, based in Brussels and founded in 2003 in order to represent the interests of all types of packaged waters across Europe. EFBW's members are national associations which together represent over six hundred bottlers across Europe. (<http://www.efbw.eu>)



SCOPE OF THE GUIDE

This guide recommends general and specific hygiene requirements for collecting, processing, packaging, storing, transporting, distributing and selling packaged water. It also illustrates the HACCP methodology at specific steps of the processing.

European and national legislation distinguish three categories of waters, still or sparkling: natural mineral water (NMW), spring water (SW) and bottled drinking water (BDW), also known as table water or processed water. This guide covers all three categories.

NATURAL MINERAL WATER

In accordance with Annex I.1.1 of Directive 2009/54/EC, NMW comes from a specified underground source which must be protected from all types of pollution.

NMW is characterised by its original purity, its microbiological wholesomeness, its stable composition (as indicated on the label) and, in some cases, its beneficial health effects. NMW may not be disinfected.

Regular and comprehensive analyses are conducted to ensure that these standards are maintained.

NMW shall be bottled at source and fitted with a tamper evident seal.

NMW shall be officially recognised by national authorities. An updated list of all recognised NMW is published by the European Commission in the Official Journal and on its website: http://ec.europa.eu/food/food/labellingnutrition/water/mw_eulist_en.pdf

SPRING WATER

In accordance with Article 9.4. of Directive 2009/54/EC, SW shall also comply with high quality standards. It shall be safe to drink at source and may not be disinfected. However, SW does not need to have the same mineral consistency as NMW and its chemical composition need not be stated on the label.

BOTTLED DRINKING WATER

BDW, sometimes called 'table water', is the description given to water that may come from various origins including surface waters or from a municipal supply. BDW is generally treated and disinfected and demineralised and remineralised as appropriate.

BDW is regulated by Directive 98/83/EC of 3 November 1998 on the Quality of water intended for human consumption.

This Guide does not advise on fortified waters, flavoured waters or other soft drinks, nor does this document provide guidance in relation to the distribution and servicing of bottled watercoolers. However the Guide is applicable to the filling of returnable containers.

RELEVANT LEGISLATION

In the preparation of the Guide, consideration has been given to the following relevant legislation :

Regulation (EC) N° **178/2002** laying down the general principle and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety

Regulation (EC) N° **852/2004** on the hygiene of foodstuffs

Council Directive **2009/54/EC** relating to the exploitation and marketing of natural mineral waters

Commission Directive **2003/40** establishing the list, concentration limits and labelling requirements for the constituents of natural mineral waters and the conditions for using ozone-enriched air for the treatment of natural mineral waters and spring waters

Commission Regulation (EU) N° **115/2010** of 9 February 2010 laying down the conditions for use of activated alumina for the removal of fluoride from natural mineral waters and spring waters

Council Directive **98/83/EEC** relating to the quality of water intended for human consumption

Directive **2000/60/EC** of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy

Regulation (EC) N° **882/2004** on official controls performed to ensure verification of compliance with feed and food law, animal health and animal welfare

Other useful information –books, legislation and reference documents – is listed in section 4.

STRUCTURE OF THE GUIDE

The main objective of this document is to help EFBW national trade associations develop their own guides and to help water bottlers meet applicable requirements on the hygiene of foodstuffs. It also aims to encourage the bottled water industry to develop its own quality and food safety management systems.

The guide is structured into three major sections :

1. General aspects of quality and food safety management
2. Prerequisite programmes (PRPs)
3. HACCP (Hazard Analysis and Critical Control Points)

SECTION 1 addresses the main features of the management of quality and food safety that should be combined with the HACCP approach of Section 3.

SECTION 2 covers standard good hygienic practices and good manufacturing practices. Section 2 takes into account all provisions of regulation 852/2004 on the hygiene of foodstuffs as well as the requirements described in the Publicly Available Specification (ISO/TS 22002-1:2009) recently issued by the British Standards Institution (BSI).

This detailed section outlines the industrial processes (from water catchments to warehousing and transport of the finished products: sections 2.1. to 2.13). Sections 2.14 to 2.20 cover a large range of specific hygienic and quality topics: foreign bodies, cleaning and sanitising, pest control, personal hygiene and employee facilities, as well as training, process and product specifications, product monitoring, traceability, complaint and crisis management, product withdrawal and recall procedures. The last subsection (2.21) is dedicated to emerging topics such as food defense, bio-vigilance and bioterrorism.

For all items of each subsection, the document is divided in **two parts**:



SHALL

Part 1 states the requirements to satisfy Regulation 852/2004. The word "shall" is used to indicate that those items are essential requirements.



SHOULD

Part 2 presents additional "guidelines" on best practices within the bottled water industry.

SECTION 3 is dedicated to HACCP.

After an overview of the preliminary steps and the seven principles, the guide gives three examples of the methodology, notably microbiological, chemical and physical hazards.





General aspects of quality & food safety management

1.1.1. BASIC PRINCIPLES

The quality and food safety management systems should be based on continuous improvement principles and developed on the basis of ISO 9001 and 22000 standards.

To be effective, the system should :

ERROR: invalidaccess
OFFENDING COMMAND: put

STACK:

/116

1

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