
Queensland Health

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Standards Management Officer
Food Standards Australia New Zealand
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Dear Sir / Madam

Submission – Application A1043 – World Health Organisation Limits for Packaged Water

Thank you for the opportunity to provide a submission on the Call for Submissions for Application A1043.

This submission provides technical advice and comments related to this issue. It was prepared with the advice of officers from other relevant Queensland Government agencies. The submission does not represent a Queensland Government position, which will be a matter for the Queensland Government when notification is made by the FSANZ Board to the Legislative and Governance Forum on Food Regulation.

Concern is raised over the proposal to include new limits for chemicals in packaged water by referencing Table A3.3 of the World Health Organisation (WHO) *Guidelines for drinking-water quality* because this potentially by-passes the scrutiny of the legislative system in Australia and allows any changes made by WHO to automatically become legal requirements in Australia. This also potentially excludes Australian stakeholders from consultation on any future changes to the limits for packaged water in Australia. As such, reproducing the WHO limits in the Food Standards Code may be more appropriate.

Should the WHO limits for packaged water be adopted by reference, it would be important that Australia is either actively engaged in the WHO development process or actively monitors proposed changes to the WHO limits and advocates or provides comment on behalf of Australia. Consideration could also be given to publishing a web link for the WHO limits for packaged water in an editorial note or guideline to make it easier for stakeholders to find the correct standard.

The number of chemicals listed in Table A3.3 of the WHO *Guidelines for drinking-water quality* is far more extensive than currently in the Food Standards Code. This may potentially lead to higher testing costs for industry and government. However, some of the analytes, particularly pesticides, are not permitted for use in Australia and therefore would not be expected to be present in packaged water produced in Australia. As such, it may be reasonable for businesses bottling

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water from Australian sources and regulatory agencies testing locally produced water to not test for these chemicals. If the WHO limits are reproduced in the Food Standards Code, it may be possible to indicate in the Standard which chemicals have not been permitted in Australia. Otherwise, if the WHO limits for packaged water are included by reference, then consideration should be given to FSANZ publishing guidance information on the requirements and listing which chemicals would not be expected to be found in Australian sources of bottled water and so could possibly be excluded from routine tests.

Consideration should be given to including chemical contaminants that may be present in contaminated ground water as a result of coal seam and shale gas fracking processes, if they are not already included in the WHO limits for packaged water.

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