Food Standards Australia New Zealand

APPLICATION A1043 – WORLD HEALTH ORGANIZATION LIMITS FOR PACKAGED WATER

Safety Assessment Report

13 September 2012

The New Zealand Food & Grocery Council (the "NZFGC") welcomes the opportunity to make a submission on A1034 *World Health Organization Limits for Packaged Water*.

New Zealand Food & Grocery Council

The NZFGC represents the major manufacturers and suppliers of food, beverage and grocery products in New Zealand. Collectively this sector generates $28.7 billion in the New Zealand domestic retail food, beverage and grocery products market and $26.3 billion in export revenue from exports to 183 countries. Food and beverage manufacturing is the largest manufacturing sector in New Zealand representing 46% of total manufacturing income and 34% of all manufacturing salaries and wages.

Food and beverage manufacturing and wholesaling in New Zealand directly employs 104,160 people (5% total employment) and, when taking the wider food and beverage value chain (including farming and food retailing/foodservice) into account, employment soars to 344,820 in 85,252 enterprises. This represents around one in five people employed in our country.

No matter how you look at it, the New Zealand food, beverage and grocery sector makes a substantial contribution to the New Zealand domestic economy, to our exports and to the general economic well-being of the country.

Application A1043

The NZFGC notes that the Table to subclause 2(2) of Standard 2.6.2 in the Australia New Zealand Food Standards Code (the Code) has not been updated since the Standard was finalised in 2000. The Application proposes an amendment be undertaken to update the Table to international standards. NZFGC also notes that the safety assessment for the World Health Organization (WHO) guideline on drinking water has been undertaken by international experts and that FSANZ limited its assessment to whether the WHO limits were safety or quality related.

Overarching Comment

In light of the prospect of the provisions in the Code being significantly out of date (Table to subclause 2(2) of Standard 2.6.2), and the level of industry support for the amendment, the NZFGC supports amendment of Standard 2.6.2 as proposed.

Specific Comments

Background

Over the last decade the bottled water industry has experienced significant growth world-wide including in both New Zealand and Australia. Growth in New Zealand received an unplanned boost through the bottled water needs of Christchurch following the 2010 earthquake and potential follow-on storage elsewhere across New Zealand.

The larger manufacturers in New Zealand have confirmed to NZFGC that they already manufacture to standards that exceed the WHO Guidelines for bottled water.

Key issues to be addressed

The WHO Guidelines that FSANZ is proposing be adopted by the Code are those found in WHO Guidelines for Drinking-water Quality, Fourth Edition (2011), Table A3.3, *Guideline values for chemicals that are of health significance in drinking-water* (WHO Guidelines).

The NZFGC agrees that FSANZ should avoid unnecessary duplication of risk assessment where this has been conducted at an international and expert level as is the case by the WHO for the purposes of its guidelines.

FSANZ suggested that the limits in the WHO Guidelines might be quality rather than health related but satisfied itself that they were safety related. FSANZ states, in Supporting Document 1, that "The WHO guidelines contain a list of 90 chemicals of concern to the safety of drinking water"[1] (NZFGC underlining). FSANZ does not state how it satisfied itself that the limits in the WHO Guidelines were all safety related and, given the title of the relevant WHO Guidelines, this seems to have been an unnecessary issue to identify.

A second issue identified by FSANZ concerned the limits for styrene and fluoride. FSANZ considered that its risk assessments justify a lower level than in the WHO Guidelines for fluoride and a higher level than in the WHO Guidelines for styrene. NZFGC supports both proposals, the first on the basis of the previous work undertaken by FSANZ and the acceptance of the fluoride level by both the Australian National Health and Medical Research Council and the New Zealand Ministry of Health.

The NZFGC supports the limit for styrene remaining at 0.03 on the basis that the WHO Guidelines are for drinking water not packaged or bottled water. Using the limit set for styrene in the Processing Aids Standard in the Code (Standard 1.3.3) addresses the packaging activity associated with drinking water.

The NZFGC notes that the number of chemicals for which limits are provided in the WHO guidelines are fewer than for either the MoH or the NHMRC. The NZFGC considers that the WHO Guidelines provide an appropriate range of chemicals for packaged water from a risk based perspective. The list of chemical limits of both the MoH and the NHMRC are designed to cover a broader range of environments, situations and populations than packaged water covers. The intensity of water use for reticulated water and the significantly broader and daily use by the population differs considerably from packaged water and the reach of reticulated water into the community is far greater than bottled water can be. As well, the WHO Guidelines are designed to cover the chemicals that are of most consequence to health so are also developed on a risk-based approach.

[1] p5 Supporting Document 1: Consideration of various regulatory and non-regulatory measures for the control of chemicals in packaged water", FSANZ, [2012]

The NZFGC notes that the proposed amendment to Standard 2.6.2 will involve a compliance cost for industry. Many in the packaged water industry are already paying for the range of tests proposed and while there may be a slight increase to these, the benefits of increased consumer confidence and improved market access for exports outweighs this cost.

Conclusion

The NZFGC supports the proposed amendment to Standard 2.6.2 for limits on chemicals fin packaged/bottled water which would see the adoption in the Code of the WHO Guidelines for Drinking-water Quality, Fourth Edition (2011), Table A3.3, *Guideline values for chemicals that are of health significance in drinking-water*. This would ensure the Code is up-to-date and reflective of the most recent science-based information concerning human consumption of water.