

Bottled Water scenario summary

**Discussed w/ Calibration Committee via email on 11/15/18**

**Scenario:** We received a question from an auditor recently regarding the use of unflavored, commercially bottled water purchased from a grocery store and used as a rinsing agent for fresh produce items. Assuming the water is single-use with no recirculation, collection or refilling of bottles, **do the producers need some sort of letter of guarantee for safety of the water?**

**Summarized Responses:**

- There is a historical example regarding packaging materials from a retailer; opinion at the time:
  - “If the material is purchased from a recognized supplier and the purchase was in compliance with the operation’s own Approved Supplier program, then no further guarantee or testing was necessary.

**Standards agreed to be most relevant:**

**3.2.1** – *“Operation has procedures for water used in contact with product or food contact surfaces”*

- Whether a temporary use or full time use of this water, a procedure is necessary for water that comes in contact with fresh produce to ensure it is adequate for its intended purpose.
- if there was no policy for use of bottled water, CAN or IAR depending on type of water used

**3.2.2** – *“Water use SOPs address the microbial quality of water or ice that directly contacts the harvested crop or is used on food contact surfaces.”*

- This standard should address the water’s suitability for the purpose and prove it
- If the water is being sold commercially as drinking water, compliance can be assumed
  
- If the water is not from a recognized source (e.g., operation is bottling it themselves or purchasing from unknown entity), further assurance that the water meets the required water standards would be expected

**5.1.1** – *“Operation has an Approved Supplier program for all incoming materials, including packaging”*

- As part of the approved supplier program, operation should keep receipts on file for purchase of the water as verification

**Some discussion on the following (ultimately decided they are N/A):**

**2.2.1/5.2.1** (*Water Used in Growing Activities/Post-Harvest Operations*) – *“A water system description shall be prepared”*

- Final decision – In this scenario, bottled water would **not** be considered part of the water system since the operation is not bottling the water themselves

**2.2.1.2** – *“The water source shall be in compliance with prevailing regulations.”*

- N/A since this water is not considered part of ‘water system’ (however, since the water is being sold commercially as drinking water, compliance would be assumed anyway)

**Additional thoughts:**

- Should also consider what is happening after the produce is rinsed (i.e. are towels used to dry?) and if those practices are also compliant