

Produce GAPs Harmonized Standard Version 3.0

Reused Water Summary

Discussed via Calibration Committee via e-mail – June 16, 2023

Interpretation Summary Finalized: Sept. 15, 2023

Scenario: 5.4.5 requires that re-used water that contacts product or food contact surfaces be treated though a clear definition of what constitutes a reused water application has not been defined.

Relevant standard (Version 2.0):

	Requirement	Procedure	Verification	Corrective Action
5.4.5	Re-used water that contacts product or food contact surfaces shall be treated using an approved antimicrobial process or chemical treatment.	Re-used water shall be treated using an antimicrobial treatment sufficient to prevent cross-contamination, unless prevailing regulation or commodity specific standards provide an alternative. Treatments shall comply with prevailing regulation or the country in which the product is intended to be traded, whichever is more stringent.	Auditor reviews water treatment process and evidence of compliance with regulation and the operation's established procedure.	Operation suspends operation until water treatment functions so as to prevent risk of product contamination. Affected product and product handling areas are evaluated for potential contamination and disposition.

Summarized discussion:

The scenario presented to the Calibration Committee involved backing up a trailer directly down a ramp into a large flume. The flume water entered at one end and was drained out the other end, at a pace of roughly 900 gallons per minute, resulting in full turnover of water every three hours. Sanitizer was not being used in the flume water, but water testing was being conducted. Because of the continual flow of the water inside the flume, questions arose as to whether the water would be considered "single pass" or "re-used". Committee members agreed that even with the turnover of the water within this flume, it could not be guaranteed that one piece of produce would not be contacting water that had already contacted other pieces of produce, and therefore would be considered "re-used" water.

This interpretation is consistent with other recognized industry standards, [including USDA's GAP program Water FAQs](#). Therefore, the committee has proposed and adopted the following interpretation of re-used water, adapted from USDA's definition.

Re-used water (batch, bulk, or recirculated) is water that contacts more than one batch or lot of produce. This can include water which is continuously pumped through a system (e.g., a flume or spray bar where water is passed through more than once) or stagnant water that is not drained and refreshed between lots (e.g., dump tank, wash sink). Because re-used water contacts multiple

batches/lots of produce, it has the potential to spread contamination and a careful risk assessment and mitigation measures should be considered.

While committee members had concerns with the practice of driving a trailer directly into the flume water, this was not the primary focus of the interpretation question.

Decision: The standard may be interpreted as compliant only in situations where appropriate treatment is applied to water that meets the definition of “re-used” water. Re-used water shall be treated using an antimicrobial treatment sufficient to prevent cross-contamination unless prevailing regulation or commodity specific standards provide an alternative. This interpretation affects both 3.2.4 and 5.4.5 of Version 3.0, and the analogous requirements in Version 2.0 until May 1, 2024. Adoption of the definition for re-used water was made unanimously by Calibration Committee members and will be added to the queue for edits to the next version of the Harmonized Standard.