



Private Water Supplies utilised by food businesses



A significant number of food businesses currently utilise private water supplies as part of their operations. These businesses include small guesthouses, large hotels and food manufacturers.

In terms of 'The Private Water Supplies (Scotland) Regulations 2006', such businesses are defined as a 'commercial activity'. Any supply utilised as part of this commercial activity would be deemed a Type A supply and fall under the scope of these Regulations. However, in addition to the Regulations, specific food legislation, will also apply.

Regulation (EC) No. 852/2004 on the Hygiene of Foodstuffs lays down specific rules regarding water supplies utilised by food businesses. Chapter 7, 1(a) in particular states that:

'There is to be an adequate supply of potable water, which is to be used whenever necessary to ensure that foodstuffs are not contaminated'.

'Potable water' means, in this instance, water meeting the minimum requirements laid down in Council Directive 98/83/EC (as amended by Regulation (EC) No. 1882/2003) on the quality of water intended for human consumption.

The use of private water supplies as part of any food operation varies, but could include the following activities:

- washing of foodstuffs (in particular high risk, ready to eat food such as salad items, fruit, vegetables etc.).
- cleaning of food equipment, utensils and surfaces.
- as a food ingredient.
- for the production of ice.
- for hand washing by food handlers.

Considering the activities above, the potability of any private water supply could have a direct bearing on the safety of the food provided for consumption. It is therefore deemed a critical area of the operations. Failure to assure a consistent safe supply of water could potentially pose a risk to health not only via consumption, but indirectly via contaminated foodstuffs.

In addition to the legislative requirements detailed above, Regulation EC No. 852/2004, Article 5 also stipulates that:

'Food business operators shall put in place, implement and maintain a permanent procedure or procedures based on HACCP principles'.



In view of the potential risks associated with the use of a private water supply, any documented HACCP (hazard analysis critical control point) based system should include an assessment of the necessary control measures, monitoring procedures, contingency plans etc. to ensure a consistent, safe supply of water is provided as part of the food operation.

