



# Position Paper

connect to the world of dairy

## EDA comments on the EU Commission proposal for a revised Drinking Water Directive (DWD)

The European Dairy Association (EDA) welcomes the European Commission proposal for a revised Drinking Water Directive (DWD). For the dairy industry water is an essential resource, and safe food is based on safe water. At the same time the dairy industry is wishing to further strive in circularity and reuse more water internally.

### General context

The European Dairy Association (EDA) welcomes the European Commission proposal for a revised Drinking Water Directive (DWD).

The proposal is part of the COM Circular Economy Action Plan presented in December 2015. Indeed, it contributes to the transition to a circular economy, thus being in line with the fundamental circular economy mindset typical of the dairy sector (please see our statement: [link](#)).

Safe drinking water is a public good, and EDA would like to reiterate the importance of drinking water for safe dairy products. Indeed, water is key element to assure safe and high-quality food production, as it is used in the dairy plants for heating, cooling, washing, and cleaning, always prioritising the highest hygienic standards and maximum safety in all sectors of production (see our factsheet: [link](#)).

The dairy sector is fully committed to increasing the reuse of water all along the food production chain (please see our special factsheet: [link](#)) and wishes the Directive to set the right legislative context for this.

### The scope of the Directive proposal

EDA welcomes the specific reference in recital 3 of the proposal (recital 10 of the previous directive 98/83/EC) which states that FBO's water intake should fall in the scope of the Directive proposal. The Dairy industry considers as essential the clear reference within recital 3 to water used in food production as to be considered as food with the meaning of the second subparagraph of Article 2 of Regulation (EC) No 178/2002.

The dairy sector wishes to increase the reuse of water all along the food production chain. Therefore, EDA reiterates its positive understanding that the accountability related to the water used in food production, whether it is reused or not, remains on FBO's responsibility under the General Food Law Regulation (EC) No 178/2002.

As a final remark on the scope of the Directive proposal, we would like to recall that the so called "cow water" is produced and used in the production of dairy products. Such water has always been considered fully as food with the meaning of the second subparagraph of Article 2 of Regulation (EC) No 178/2002. Therefore, we would appreciate a rewording of Article 2 paragraph 1 of the Directive proposal, specifically the words *[all waters]*, in order to take into account our sector concern.



# Position Paper

connect to the world of dairy

## Chlorates

The European dairy industry wishes to recall that chlorination of potable water used in food processing plays an essential role in the control of microbial, viral or parasitic pathogens and limits the occurrence of foodborne diseases.

Processing and cleaning water needs to contain sufficient residual concentrations of active substances to ensure microbiological quality and ensure the safety of food production and to prevent re-contamination of cleaned and disinfected surfaces.

EDA is concerned that too strict limits for chlorates would require the reduction of disinfectants to concentrations below those considered as effective to achieve sufficient elimination of pathogens.

The REFIT stakeholder platform requests proportionate risk management measures regarding the presence of chlorate in food, for details see: [link](#). We, as EDA, believe that the reduction of the levels of chlorate in drinking water is a necessary step prior to the setting of maximum levels for chlorate in food without, however, undermining public health risks.