

ASSESSING THE SAFETY OF PRIVATE WATER SUPPLIES

(This appendix applies to water that comes into contact with teats, udders and milk (via internal equipment surfaces), and is not applicable to water that is used as livestock drinking water, or water used to wash down parlour stalls, walls and floors)

Regulation (EC) No 852/2004, Annex I, Part II (4)(d) requires the use of potable or clean water whenever necessary to prevent contamination during primary production. Current interpretation of this is that clean water can be used during certain primary production activities as long as the water meets the definition of clean contained in the regulations. That means that it does not contain micro-organisms, harmful substances or toxic marine plankton capable of directly or indirectly affecting the health quality of food. It also means that the clean water is not used as an ingredient and/ or is not intentionally added to the food.

Private water supplies (PWS) are not provided by a water utility company and they could include boreholes, springs and wells.

Ensuring the safety of water

Private water supplies must:

1. Be properly managed, maintained, protected and treated
2. Be routinely monitored and inspected to ensure it is good working order and has not been interfered with or damaged
3. Regularly maintain the equipment as per manufacturers' instructions
4. Test PWS water for hazards (microbiological and chemical) before use

Risk Assessment

PWSs are at risk of contamination from a range of sources, from surface water and livestock to humans and vermin and a range of contaminants – including pathogenic micro-organisms associated with faecal matter and chemicals.

1. A risk assessment must be carried out annually (see www.redtractorassurance.org.uk for a template)
2. Where the risk assessment or water testing identifies a potential risk, details of investigations into the cause(s) of the problem and remedial actions must be undertaken and recorded

ASSESSING THE SAFETY OF PRIVATE WATER SUPPLIES

WATER TESTING – Verifying of water is safe through testing

Testing water for microbiological is a means of verifying its safety. The presence of E.coli (or faecal coliforms) in excess of 10 CFU/100 ml is an indication that faecal contamination of the water source has occurred and that there may be a microbial safety risk associated with the water. This is the primary concern to the water supply (note there are a range of other contaminants that can be tested for and are useful information).

When taking a water sample, ensure a fresh sample is taken (run tap first), use a clean container and do not contaminate the sample once taken (e.g. from the tap as the sample is being taken).

WATER TEST RESULTS- Remedial action

- where less than 10 CFU E.coli (or faecal coliforms)/100ml is found to be present following a water test, the water may be used.

- where more than 10 CFU E.coli (or faecal coliforms)/100 ml are found to be present following a water test, the source of the problem should be investigated and the contingency plan implemented such that the water should either not be used or alternative steps should be taken to restrict use of the water until investigations have been carried out and remedial action has been taken. Such action may be to switch to another water source (e.g. mains water supply) or if this is not possible, the water should be treated to reduce the risk of microbial contamination or chemical residue and retested before use.

- where water testing repeatedly fails on E.coli (or faecal coliforms), despite remedial action, the contingency plan must remain in place until written clearance from the Environmental Health Office or local authority to continue using the water of milk production is obtained. The EHO/LA may require additional criteria before use.

Possible remedial actions must be appropriate to rectify the problem. Depending on why the source failed, they may include:

- installation or replacement of UV filters
- addition of dilute hypochlorite solution to the header tank (not suitable for header tanks used to supply livestock drinking water)
- repair of the PWS chamber or replacement of any caps and seals
- guidance from the equipment manufacturer