

TGN11 - STORAGE AND USE OF BOTTLED WATER

Introduction

From time to time a water company may need to provide alternative supplies in the form of bottled water. They may also be distributed as part of a company's provision of alternative supplies under the Security and Emergency Measures Direction 2006 issued by Defra, of 10 litres per person per day or 20 litres per person per day in incidents lasting more than 5 days.

Good practice

Prior to supply

1. Bottled water provided to customers by a water company is classified as drinking water and therefore must be in compliance with drinking water quality standards at the point of consumption. Bottled water manufacturers are required to provide information on water quality at the point of bottling. Water companies must therefore ensure therefore that they are satisfied that the bottled water that they provide to consumers meets the appropriate standards at the relevant point of compliance.
2. Bottled water must, by law, be sold in sealed tamper-evident containers. Bottled water must comply with the microbiological standards in the Natural Mineral Water, Spring Water and Bottled Drinking Water Regulations 2007, SI 2785 up to the point of sale (during its marketing). Note: the exception is TVC which is only applicable within 12 hours of bottling (maintained at 4 +/- 1 C)
3. When a delivery of bottled water is made to the water supplier, the manufacturer should issue a quality test certificate. The certificate should include the results of all microbiological testing, particularly *E.coli* and coliform bacteria and colony counts at 22°C and 37°C measured within the period 12 hours following bottling with the water being maintained at 4°C (+/-1 °C).

Storage

1. Water is labelled with "Best Before" durability labelling, rather than 'Use By'. If the bottles of water are stored correctly the water will not deteriorate and there is no requirement for regular testing during storage. If stored for an unusually long period, the water should be checked, but primarily to test for any deterioration in the integrity of the packaging. The storage conditions should be supervised to ensure that they are satisfactory but, provided that this is the case, it is not necessary to routinely analyse the water.
2. Bottled water must be stored in conditions suitable for food products as recommended by the supplier. A cool, dust-free environment, away from direct sunlight and potential sources of contamination, such as strong smelling chemicals or diesel fumes. Under no circumstances should the product be stored outside and / or exposed to sunlight.
3. The shelf life of the product kept in suitable conditions is as advised by the manufacturer and is usually a maximum of 2 years. Stocks should have a clearly displayed "Best before date" and should be rotated in appropriate order to ensure that the oldest stock is used first. Any stock identified as being out of date must not be issued and should be disposed of.
4. If there are any concerns that the quality of a batch of bottled water has deteriorated then

a quarantine and testing procedure should be in place to ensure it is not deployed to customers until sample results have confirmed conformity or otherwise.

Use of Bottled Water

1. A record should be kept of when strategic quantities bottled water are deployed. This should detail the date, quantity issued and batch number. In some cases the record may need to include where the water was used e.g. sub-depot or to whom the bottled water was issued e.g. distribution inspector.
2. The record should be completed for all strategic issues – including any water that is returned or discarded (including the reason why).
3. Guidance to the Water Supply (Water Quality) Regulations 2016 and their equivalents in the devolved administrations contains further details of the monitoring requirements necessary for bottled water supplied to customers. This specifically requires bottled water that has been deployed and left outside of the water undertakers control (but not on consumers premises) to be sampled at the point of deployment (for example where a pallet of bottled water is delivered to the corner of a street or car park).

Audits

1. Each store of bottled water should be subject to a regular (at least annual) audit, by water quality staff.
2. As part of the audit, a review of the results from routine sampling should be carried out and where necessary additional samples should be taken.
3. The findings of the audit should be discussed and agreed with relevant personnel and management and any improvements documented in changed procedures.
4. Audits of bottled water producers should also be carried out to enable the water undertaker to satisfy itself of the quality procedures throughout the entire production process.

Product recall

1. Should a bottled water supplier instigate recall of a batch of bottled water, the water undertaker should be notified immediately in order to prevent issue of substandard or contaminated product to its customers.
2. Procedures should be in place for communication during and outside normal working hours.
3. The bottled water supplier should provide full details of the reasons for the recall together with details of the batch recalled, including the location of all relevant deliveries made to the water undertaker.
4. The appropriate batch should be quarantined for return to the supplier or discarded.

Please see the position paper on bottled water regulation at Water UK website - www.water.org.uk/regulations-use-bottled-water-water-companies