

THE SANBWA STANDARD

In South Africa, bottled water is a food product category of its own, and is regulated by the Department of Health as such. The legislation (R718) was ratified in 2007 in line with representations and recommendations from SANBWA, as well as international trends, and is among the most stringent worldwide. But it is not the only legislation bottlers must comply with. They also need to meet packaging and labelling, environmental and product safety requirements, for example.

The SANBWA Bottled Water Standard addresses all the current legislation and best practices for bottling water of all types in South Africa in one document. A pragmatic and useful tool, it benchmarks favourably against the Global Food Safety Initiative (GFSI) as including all the relevant control points of global standards such as BRC, IFS, ISO22000, SANS 10330, SANS 1049 and the NSF Beverage standards.



BOTTLED WATER LEGISLATION IN SOUTH AFRICA

In 1997, the newly formed South African National Bottled Water Association (SANBWA) lobbied the Department of Health to draft legislation specifically governing bottled water. At that time, bottled water was regulated according to the general safety and quality criteria governing the production of food.

Following these representations and recommendations from SANBWA, and in line with international trends, the Department of Health drew up new legislation specific to the packaged water industry based on the Codex Alimentarius.

In July 2007, this legislation (R718) was ratified and, for the first time, all enterprises in South Africa packaging water for sale to the public were officially regulated and monitored by the Department of Health.

Given that the most packaged water is bottled, the terms 'bottled' water and 'packaged' water are used interchangeably by the industry and the public.

In addition to R718, bottlers need to comply with a number of other legal, hygiene, food safety and quality, packaging and environmental legislation, including:

DEPARTMENT OF HEALTH

Foodstuffs, Cosmetics and Disinfectants Act, 1972 (Regulations ref 2-7 below form part of this Act) – Act No. 54 of 1972

Regulations governing General Hygiene Requirements for Food premises, the transport of Food and related matters – R. 638, June 2018

Regulations relating to all bottled waters – R. 718, 28 July 2006; R. 800, 31 July, 2009

Regulations relating to all packaged waters – R. 718, 28 July 2006; R. 800, 31 July, 2009

Regulations Governing Microbiological Standards for Foodstuffs and related matters and amendments – R. 692, 16 May 1997; R.1588, 20 December 2002

Regulations Relating to the Labelling and advertising of Foodstuffs, including amendments as per R.45, Jan 2012 – R.146, 1 March 2010

Regulations relating to the Hazard Analysis and Critical Control Point System – R 908, 27 June 2003; R. 607, 14 June 2018

Regulations relating to the Hazard Analysis and Critical Control Point System: Amendment – R 908, 27 June 2003; R. 607, 14 June 2018

Regulations related to Milk and Dairy Products (Definitions for hermetically sealed containers) – R.1555 of 21 November 1997; R.1555 of 21 November 1997

THE DEPARTMENT OF WATER AND SANITATION

National Water Act (Act No. 36 of 1998) – Act No 36 of 1998

Minimum Standards and Guidelines for Groundwater Resource Development for the Community Water Supply and Sanitation Programme, First Edition, April 1997 – Act No 36 of 1998

SANS 241:2015 South African National Standard for Drinking Water - Act No 36 of 1998

DEPARTMENT OF ENVIRONMENTAL AFFAIRS

National Environmental Management: Waste Management Act (NEMA) – Act No 59 of 2008

DEPARTMENT OF AGRICULTURE, FORESTRY AND FISHERIES (DAFF)

Fertilizers, Farm Feeds, Agricultural Remedies and Stock Remedies (Act No. 36 of 1947) – Act No. 36 of 1947

Legal Metrology Act, 2014 (Act No. 9 of 2014) – Act 9 of 2014

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ELEMENTS	SANBWA	BRC	SQF	SFFC	ISO 22000	ISO TS 22000	ISO 9000
Management Commitment	✓	✓	✓	✓	✓	✗	✓
Crisis Control & Communication	✓	✗	✓	✓	✓	✗	✓
Food Safety (HACCP)	✓	✓	✓	✓	✓	✗	✗
Quality Management	✓	✓	✓	Partial	Partial	✗	✓
Site Standard & PRP's	✓	✓	✓	✓	✗	✓	✗
Personnel & Training	✓	✓	✓	✓	✓	Partial	Partial
Product Control	✓	✓	✓	Partial	Partial	✗	Partial
Process Control	✓	✓	✓	Partial	Partial	✗	✓
Water Source Control	✓	✗	✗	✗	✗	✗	✗
Packaged Water Standards	✓	✗	✗	✗	✗	✗	✗
Packaged Water Regulations	✓	✗	✗	✗	✗	✗	✗
Environmental Stewardship	✓	✗	✗	✗	✗	✗	✗

The SANBWA Standard – its full title being 'SANBWA Bottled Water Standard: Requirements for Source Water, Processing and Packaging' – addresses all the current legislation and best practices for bottling water of all types in South Africa in one document. In other words, it is a single standard.

It covers all forms of packaged water defined by the legislation in the Foodstuffs Cosmetics and Disinfectant Act (Act 54 of 1972) Regulation R718, 28 July 2006 as amended by R800 of 31 July 2009: Regulations Relating to all Packaged Water as well as preparation of such waters used for making enhanced and/or flavoured waters, and sealed packaged water for use in water coolers.

This includes natural water, water defined by origin (including spring and mineral water) and prepared water. It excludes surface water which has not had municipal treatment to render it potable and bulk water for office coolers once the seals of containers have been broken to install on the dispenser equipment.

Compliance to all the requirements set out in the Standard is an assurance to retailers, consumers and the bottler that all legal and food safety requirements have been met. In summary, it:

it ensures legal compliance
is fully auditable so that a single audit can ensure that all legal and food safety requirements have been met, thereby protecting the bottler and enabling it to prove due diligence
helps bottlers identify areas where they still need to improve
assists retailers and consumers to select suppliers of safe bottled water
offers a natural progression from legal compliance to quality management systems and GFSI standard certification

The Standard provides the basis for SANBWA's annual member plant audits by an independent third-party food safety organisation appointed by SANBWA. The audit confirms members' conformance with the technical and regulatory requirements.

A pragmatic and useful document, the SANBWA Standard is comparable to the main food and beverage standards in major markets around the world. It benchmarks favourably against the Global Food Safety Initiative (GFSI) as including all the relevant control points of global standards such as BRC, IFS, ISO22000, SANS 10330, SANS 1049 and the NSF Beverage standards.

The Standard is regularly reviewed and revised, the current version being Version 4.0 September 2019.

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