

CODEX COMMITTEE ON FOOD HYGIENE
(Fifty-fourth Session)
Nairobi, Kenya
11 – 15 March 2024

European Union Comments on

Agenda item 7:

**PROPOSED DRAFT REVISION ON THE GUIDELINES ON THE
APPLICATION OF *GENERAL PRINCIPLES OF FOOD HYGIENE TO THE
CONTROL OF PATHOGENIC VIBRIO SPECIES IN SEAFOOD (CXC 73-
2010)***

**(Prepared by the Electronic Working Group chaired by Japan and co-chaired
by Chile)**

CX/FH 24/54/8
(Reply to CL 2024/9-FH)

Mixed Competence
European Union Vote

In response to the request for comments, the European Union and its Member States (EUMS) would like to make the following comments.

I. General Comments

The EUMS would like to thank and congratulate Japan and Chile with the proposed revision of the Guidelines on the application of the *General Principles of Food Hygiene to the Control of Vibrio Species in Seafood*. The EUMS generally support the draft, subject to the considerations of the comments made below and the outcome of the discussions at CCFH54.

The EUMS would like to indicate that they are in favour of a full structural and technical revision to ensure a complete alignment of this draft before adoption with the revised *General Principles of Food Hygiene* (see agenda item 9 of CCFH54).

The EUMS generally agree with the proposed replies to the questions in the draft revision; however, some comments are made in part II.

II. Specific comments

- INTRODUCTION: The EUMS acknowledge the paramount importance of a scientific basis to ensure risk-based control measures. However, the EUMS are wondering if such extended introduction is needed providing all scientific background. This is very unusual

in guidelines on control measures and this background is largely provided by the JEMRA reports referred to in the draft. The EUMS consider that the introduction could be substantially reduced and replaced by references to the JEMRA reports.

- Para 2 the EUMS suggest to modify the last sentence as follows: “**it should be noted that** *V. alginoliticus*, non-choleraenic *V. cholera cholerae* (**non O1/non O139 strains possessing the ctx gene for cholera toxin**), *V. fluvialis*, *V. furnissii*, *V. hollisae* (re-classified as *Grimontia hollisae*), *V. metschnikovii* and *V. mimicus* can also cause food-borne illness.” Rationale: any relevant information regarding these species be explicitly included at this stage.
- Para 4: The EUMS consider that there is a contradiction between the recommendation to mitigate the risk assuming that all strains are potentially virulent and the statement that it is possible to differentiate between virulent and avirulent environmental strains of *V. cholera* and *V. parahaemolyticus*, even when if the mechanism of pathogenicity is not yet completely understood. The EUMS suggest modifying the second sentence as follows: “The pathogenic mechanisms of *V. vulnificus* have not been clearly explained, and its virulence appears to be multi-factorial and is not well understood, and therefore it is recommended to implement measures to mitigate the risk assuming that all strains **need to be handled as pathogenic**”.
- Para 7, first sentence: *V. parahaemolyticus* is considered to be part of the autochthonous ~~microflora~~ **microbiota** in the estuarine and coastal environments in tropical to temperate zones. Rationale correct term is microbiota.
- Para 7 fourth sentence: The EUMS propose the following change: “It is also found that positive correlation for temperature to *Vibrio* **parahaemolyticus** levels in tropical areas where there are high fluctuations, such as macro-tidal harbours and near tidal creeks” Rationale: the reference shall clearly refer to *V. parahaemolyticus*.
- Para 10 last sentence: The EUMS suggest replacing “most countries” by “some countries”. Rationale: there is no evidence that this applies to most countries of the world.
- Para 12, footnote 5: “treated” means any vibriocidal treatment (e.g., heat treatment, high pressure.). Refer to Section 2.3 (definition for “partially treated”). The EUMS suggest including this definition in point 2.3 of definitions, instead of in a footnote. In addition, it may be useful to specify which types of heat treatments would be included.
- Para 14: The EUMS propose the following change at the end of the paragraph: the sentence “The choleraenic strains of *V. cholerae* may persist, **and some factors** may trigger an epidemic in the newly established environment” shall describe which are the factors that may trigger an epidemic.
- Para 16: The EUMS agree to mention that, in according to MRA 35, the climate change could play a role in increasing risks associated with pathogenic vibrios (Baker- Austin et al., 2012), and in particular non-cholera vibrios such as *V. vulnificus*, *V.*

parahaemolyticus, and non-O1 *V. cholerae* (Baker-Austin et al 200., 2017). The EUMS suggest amending the first sentence as follows: “Outbreaks of food-borne cholera have been noted **in some parts of the world** in the past 30 years...”.

The final sentence as proposed in question 6 has the agreement of the EUMS.

- Para 17: The EUMS suggest to replace the sentence: “...following consumption of raw or partially cooked bivalve molluscs and other seafood” with: “...following consumption of raw or partially cooked **treated** bivalve molluscs and other seafood”. Rationale: It may be useful to harmonize the terminology in the document. The EUMS also suggest replacing “The dose response for humans is not known” by “the dose response for humans is **still unclear (certain epidemiological data estimated it at 1000 cells) however more data are necessary**”. Rationale: there are data that make an estimation, the word unclear is more science based than unknown.
- Para 20: The EU MS would like to remove the sentence “Flow-through depuration with higher salinity levels (>30 ppt) may be used to reduce or eliminate *V. vulnificus* in oysters. High-salinity field or high salinity recirculating aquaculture (>30 ppt) may effectively reduce *V. vulnificus* within 21 to 30 days, although reductions vary.” Rationale: this suggestion, even if scientifically valid, appears to be not realistic in the normal practices and could open the door to criticisms on the applicability of the guide.
- Para 27: The EUMS suggest the following change: ~~Thoroughly~~ treated: Any treatment intended to eliminate *Vibrio* spp. in seafood. Rationale: According to definitions there is no difference between the definition of treated and thoroughly treated. The EUMS suggest keeping only treated. The EUMS suggest including some examples of partially treated and treated, specifying, for example, which type of heat treatments would be included in each of them.
- Para 34: Typo in the first line: “portable water” means “**potable** water”. The EUMS disagree with the modification in the last sentence “The delay between harvest and refrigeration should be as short as ~~possible~~ practicable”. Rationale, the delay shall be as short as possible putting in place all the measures to reduce the time. Practicable introduces the possibility to prolong the time because in a certain situation it was not possible to reduce the delay.
- Para 37: The EUMS suggest modifying the sentence as follows: “When the product is required to be washed, whether onboard the boat or at port, **potable water or** clean water should be used”. Rationale: the use of potable water is always to be preferred.
- Para 39: The EUMS consider that instead of a reference to CXG 100-2023 (Guidelines for the Safe Use and Reuse of Water in Food Production and Processing) in a section on “Cleaning, maintenance and personnel hygiene at primary production, it might be appropriate to make a separate section (e.g. 3.5) on water, making reference to CXG 100-2023, in particular the decision tree in Figure 3 of Annex II (subject to progress in the adoption steps of this Annex II).

- Para 46: The EU MS would propose to modify the first sentence as follows: ~~“Whenever feasible,~~ premises and rooms should be designed to keep raw material areas separated from finished seafood product areas.” Rationale: this requirement should be compulsory and not “whenever feasible”.
- Para 47: Same comments as 46
- Paragraph 63: NOTE: “If there are no objections from other members, it is better to control the temperature at “5°C or lower” to limit the growth of pathogenic *Vibrio* spp.” The EUMS agree with this change of temperature, however we consider it would be very useful to have a scientific reference to establish this temperature.
- Para 69: The EUMS propose the following change: “Clean water at low temperature should be used for washing and processing **whole** seafood ~~at processing establishments.~~ However, the eviscerated cavity of fish and other edible parts of seafood intended for raw consumption (e.g., preparation of sashimi) should be thoroughly washed with potable cold running water. Rationale: make a difference allowing the use of clean water and potable water in different steps of the production with different risks.
- 5.5 Water: Similar to its comments on paragraph 39, the EUMS consider that this section should contain a reference to CXG 100-2023, in particular the decision tree in Figure 4 of Annex II (subject to progress in the adoption steps of this Annex II).
- Paragraph 100, NOTE: “The 3rd practice is against *V. vulnificus* infection through open wounds, not relating to foodborne illness. Further discussion may be necessary as to whether it should be included in the consumer education part of this guideline.”
The EUMS support to keep this recommendation here.

Annex on the control measures for *Vibrio parahaemolyticus* and *Vibrio vulnificus* in Bivalve Molluscs

General comments

The EUMS consider as fundamental the discussion about the laboratory methods, including the definition of possible limits (that could also be the absence) for *Vibrio parahaemolyticus* and *Vibrio vulnificus* in Bivalve Molluscs. This could take the form of a guidance document or good practice document that outline and describe in detail the most appropriate methods applicable, for what additional advice could be needed. The EUMS also consider it opportune to repeat the reference to CXG 100-2023, in particular the decision trees in Figures 3 of and 4 of Annex II (subject to progress in the adoption steps of this Annex II).

- Para 9: The EUMS suggest to modify the first sentence as follows: “The control measures described in this section generally apply to pre-harvest environmental conditions and practices during and immediately following harvest. ~~,- typically while under the control of the harvester.-~~”. Rationale: the control measures as identified after the

sentence are not completely under the control of the harvester, but also under the control of the Competent authorities that classify the areas. This transfer of responsibility cannot be accepted by the harvesters.