

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

European Union Comments on

Agenda item 12:

**DISCUSSION PAPER ON THE REVISION OF THE GUIDELINES ON
THE APPLICATION OF GENERAL PRINCIPLES OF FOOD HYGIENE
TO THE CONTROL OF LISTERIA MONOCYTOGENES IN FOODS
(CXG 61-2007)**

(CX/FH 24/54/13)

*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 Comment

The EUMS would like to thank and congratulate Canada, France and the United States of America with the drafting of the very useful discussion paper on the revision of the Guidelines on the Application of General Principles of Food Hygiene to the Control of *Listeria monocytogenes* in Foods (CXG 61-2007). The EUMS can support the recommendation that CCFH undertakes new work to revise and update the appropriate text in CXG 61-2007, subject to the considerations of the comments made below.

The EUMS also welcomes the additional work carried out by JEMRA in 2022 and 2023 but insists on the full publication of the meeting reports without undue delay.

II. Specific comments

Appendix 1, Part 1

Recommendations of control of *L. monocytogenes* at primary production are limited in CXG 61-2007 and quite general (referring to other standards). A revision is welcomed but can probably be addressed by a revision of Section III of the main document. More specific recommendations might be useful.

The FAO/WHO Expert reports recommend evaluating the virulence of strains since substantial differences exist. Also, the impact of susceptibility of different populations was assessed. This should be reflected in the recommendation of control measures.

The EUMS strongly support a further elaboration of environmental monitoring and control, including when there is evidence of persisting contamination. Annex I should be extended for that purpose, including possible examples. A merging of Annexes I and III could be considered (both are relevant for environmental control).

The use of Whole Genome Sequencing (WGS) should be encouraged and the development of a data base with WGS profiles from human, animal food and environment samples, and their comparison should be recommended.

Finally, the EUMS would like to emphasize the importance to clarify the responsibility of the FBO to consider the reasonably foreseeable conditions of use of the food. This should be an evident part of the control measures of *L. monocytogenes* by FBO's in order to account for consumer behaviour. Rationale: Sometimes the intention of the FBO, in line with the labelling of the food product (e.g. cook thoroughly), might not be the way in which consumers will prepare the food in practice (e.g. only a simple warming of the product or even not cooked at all). This could be seen as misuse of the product but when this is likely to be done in practice these consumers habits need consideration.

Appendix 1, Part 2

The EUMS strongly support the recommendation to provide guidance in assisting to the determination of growth of *L. monocytogenes* in RTE food where growth occurs (e.g., challenge tests performed according to the ISO 20976-1 standard).