

**CODEX COMMITTEE ON CONTAMINANTS IN FOOD**  
**16<sup>th</sup> Session**

**18-21 April 2023 (physical plenary meeting)**  
**26 April 2023 (virtual report adoption)**

**EU comments on**

**Agenda Item 10**

**Discussion paper on the prevention or reduction of ciguatera poisoning**

**(CL 2023/21-CF and CX/CF 23/16/10)**

*Mixed Competence*  
*European Union Vote*

The European Union as co-chair and its Member States (EUMS) welcome and appreciate the work done by the United States of America as chair of the Electronic Working Group (EWG) to prepare the discussion paper CX/CF 23/16/10.

The EUMS support the proposal for a new work on a Code of Practice for the prevention or reduction of ciguatera poisoning based on the discussion paper CX/CF 23/16/10 developed by the EWG.

The EUMS wish to make the following comments, suggestions (mostly suggestions for other wording, additional information) to the document CX/CF 23/16/10:

**GENERAL**

It is observed that certain terms are wrongly translated into French and the Codex secretariat will be informed of these wrong translations.

**INTRODUCTION**

- Paragraph 1: it is proposed to replace “*shellfish*” by “*filter feeders or scavengers marine invertebrates*”

**APPENDIX I**

- Paragraph 4: it is proposed to replace in the 5<sup>th</sup> line “*are not well understood*” by “*for which the mode of action remains unknown*” and in the last sentence to replace “*symptoms can be managed*” by “*a systematic treatment is possible*”
- Paragraph 7: it is proposed to replace “*Neuroblastoma assay (N2A) : uses cell lines to measure a composite cytotoxicity*” by “*Cellular-based assay on neuroblastoma (CBA-N2A) : measures cell lines viability N2A exposed to a biological extract contaminated with CTX and enables to evaluate its concentration of ciguatoxins*”

- Paragraph 9: it is proposed to replace in the second sentence “*collected*” by “*isolated*” and “*shellfish*” by “*marine invertebrates*”
- Paragraph 11: it is proposed to insert the word “*incidence*” before “*rate of illness*”.
- Paragraph 12: in order to clarify the presentation of the EU project EuroCigua, it is proposed to replace the second bullet by “*The EuroCigua project in the European Union (EU)/Economic European Area (EEA). The main objective of this project is to characterise the risk in the UE with several objectives : determine the incidence of ciguatera cases in Europe and epidemiological characteristics ; evaluate the presence of ciguatoxins in fish and fishery products and in EU waters ; and elaborate and validate detection, quantitative and confirmatory methods for CTX analysis See [www.aesan.gob.es/AECOSAN/web/ciguatera/home/aecosan\\_home\\_ciguatera.htm](http://www.aesan.gob.es/AECOSAN/web/ciguatera/home/aecosan_home_ciguatera.htm)*”
- Paragraph 14: it is proposed to replace “*take advantage of different aspects*” by “*are based on biological and structural properties*” and to replace “*health advisory levels*” by “*safety limits defined by competent authorities / public health agencies*”
- Paragraph 15: it is proposed to replace “*toxin congeners*” by “*toxin analogues*” and to replace “*source location*” by “*geographical origin*”
- Paragraph 16: it is proposed to replace “*vary with the season*” by “*vary from one location to another*”
- Paragraph 22: it is proposed to insert in the second sentence after “*Passive sampling*” “*of toxins in the water column*”
- Paragraph 23: it is proposed to replace “*N2A*” by “*CBA-N2A*”, to replace “*using quantitative method such as LC-MS*” by “*using an analytical method such as LC-MS/MS that enables to identify well-known toxins and determine CTX content.*” and to replace “*to test fish to a sufficient degree*” by “*to test systematically fish*”
- Paragraphs 24 and 31: it is proposed to replace “*regulators/government officials*” by “*competent authorities*”.
- Paragraph 27, second bullet: it is proposed to replace the second bullet “*The Government of Canary Islands (Spain) has developed a protocol for management of wild-caught (non-aquaculture) fishery products susceptible to CP at the first point of sale<sup>2</sup>*” by “*The Government of Canary Islands (Spain) has developed a protocol for management for all the wild-caught (non-aquaculture) fishery products obtained at the first point of sale<sup>2</sup>, and that are considered risk specimens to vehicular CTX to the consumer, by detection of ciguatoxin in a 100 g muscle sample, obtained from the dorso-caudal area. The method consists of a previous extraction procedure, and detection of toxicity is determined by Neuro-2a-MTT assay. The evaluation is carried out on specimens individually, and the risk level of each one is included in the official control protocol, considering the species of fish to which it belongs and the weight of each specimen. The specimens in which CTX is not detected are released for consumption, while those with traces of CTX are disposed as animal by-products.*” (footnote 2 remains unchanged).

- Paragraph 27, 5<sup>th</sup> bullet: it is proposed to replace the 5<sup>th</sup> bullet “*The Ciguawatch platform (referred to in the previous section) includes information on management options, fish advisories, and sampling strategy*” by “*In French Polynesia, even if no management measures is implemented since the strategy is based on an integrated risk based approach, it can be noted that the Ciguawatch platform (referred to in the previous section) includes information on management options, fish species at risk and advisories on sampling strategy*”
- Paragraph 37 (ii): “*Appendix I*” should be replaced by “*Appendix II*”
- Paragraph 37 (iii): “*Appendix II*” should be replaced by “*Appendix III*”

## APPENDIX II

- Point 3): it is proposed to replace “*government officials*” by “*competent authorities*” and to replace “*fish harvesters and producers*” by “*fish sector operators*”
- Point 4(a): it is proposed to delete the first sentence as it is reflected in the second sentence and therefore superfluous and to replace “*fish harvesters and producers*” by “*fish sector operators*”.
- Point 4(d): it is proposed to add “*and public health agencies*” after “*international organisations*”

## APPENDIX III

- Point 2. 3<sup>rd</sup> bullet: it is proposed to replace “*government officials*” by “*competent authorities*” and to replace “*local area*” by “*different harvesting areas*”.
- Point 2. 4<sup>th</sup> bullet: it is proposed to replace for the definition of “*outbreak*” “*(e.g. at least one person ill)*” by “*(e.g. at least two persons ill)*”
- Point 2. 5<sup>th</sup> bullet: it is proposed to add “*and/or considered as being at risk*” after “*closed to harvesting*”
- Point 2. 6<sup>th</sup> bullet: it is proposed to replace “*Government officials could develop policies related to CP and request that producers adhere to HACCP principles.*” by “*Competent authorities could develop policies related to CP and request that operators take this risk into account in the HACCP plan*”
- Point 4. Title: it is proposed to replace “*producers*” by “*fish sector operators*”
- Point 4. 1<sup>st</sup> bullet: it is proposed to replace the first bullet by “*Firms should consider adding CP to the FSMS plans, **to include CP risk into the HACCP plan**, to reduce the likelihood of CTX-contaminated fish entering the marketplace. These could include inspection **by the competent authorities** of fish processing plants **regarding this hazard**, testing of commodities, and establishing criteria for rejecting shipments.*” (*bold parts changed or added*)

- Point 4. 2<sup>nd</sup> bullet: it is proposed to replace “*primary seafood processors*” by “*fish sector operators*” and to replace the last sentence by “***Fish sector operators should avoid purchasing fish species harvested in areas established or at risk for ciguatoxins***”
- Point 6 2<sup>nd</sup> bullet: it is proposed to replace “*restricted*” by “*known to be at risk*”

#### **APPENDIX IV**

- It is important to clarify if the list of species listed in appendix taken from the “Report of the expert meeting on ciguatera poisoning” is aimed to be a comprehensive list (including the locations and the references to scientific papers) or not.

In case it is aimed to be a comprehensive list, then

- “French Polynesia (Gaboriau et al 2014)” has to be added to the entry “Blacksaddled coral grouper, *Plectropomus laevis*” and
- “Rapa island (Chinain et al 2020)” has to be added to the entry “Blue sea chub (omnivorous), *Kyphosus cinerascens*”.