

16/11/2022

CODEX COMMITTEE ON FOOD HYGIENE
(Fifty third Session)
San Diego, United States
29 November – 2 December 2022 and 8 December 2022

European Union Comments on

Agenda item 7:

**DISCUSSION PAPER ON THE REVISION OF THE GUIDELINES ON
THE APPLICATION OF GENERAL PRINCIPLES OF FOOD HYGIENE
TO THE CONTROL OF PATHOGENIC VIBRIO SPECIES IN SEAFOOD
(CXG 73-2010) (CX/FH 22/53/7)**

*Mixed Competence
European Union Vote*

The European Union and its Member States (EUMS) would like to thank Japan and New Zealand for the preparation of this discussion paper. In response to the request for comments, the EUMS would like to make the following comments.

I. General Comment

The EUMS support the recommendation resulting from the analysis to undertake new work to revise and update the appropriate text in CXG 73-2010. The EUMS would like to already make the following more general comments on such revision:

- There is a need to acquire further scientific knowledge on new matrices other than bivalve molluscs e.g. shrimps;
- Section V of the main guidelines (e.g. section 5.2.2.2) could specify adequate heat treatments in order to guarantee uniform practices.

II. Specific comments

Paragraph 5

The EUMS propose the following amendment: “However, new and highly pathogenic strains **of V. parahaemolyticus** have emerged with a significantly lower infectious dose 50 and different growth characteristics compared to the V. parahaemolyticus strains used in the previous risk assessments. Rational: it could be emphasized at the beginning of the sentence that the new strains belong to V. *parahemoliticus*.”

Paragraph 7

The EUMS would find it useful to specify ‘favourable conditions’ in terms of temperature, salinity, etc. .

Paragraph 9

The EUMS suggest to replace “most countries” by “some countries”.

Paragraph 10

It could be useful to mention examples of “control measures” that could be applied (for example high pressure or freezing).

Paragraph 14

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 al200., 2017).

Paragraph 15

The EUMS suggest to amend the first sentence as follows: “Outbreaks of food-borne cholera have been noted quite often **in some parts of the world** in the past 30 years...”

Paragraph 16

The EUMS suggest to replace “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”.

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

The EUMS support the revision of Section 3 based on the information provided in MRA 35. The EUMS consider that a dedicated Annex for bivalve molluscs should be maintained taking into account the specificity of those products that cannot be compared with other fishery products.

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.