

**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 8:**

**DISCUSSION PAPER ON REVISION OF THE GUIDELINES ON THE  
APPLICATION OF THE GENERAL PRINCIPLES OF FOOD HYGIENE  
TO THE CONTROL OF VIRUSES IN FOOD (CXG 79-2012)  
(CX/FH 22/53/8)**

**(Reply to CL 2022/50/OCS-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 Comment**

The EUMS would like to thank and congratulate Canada and the Netherlands with the drafting of the very useful discussion paper, identifying several issues that may justify a revision of the guidelines on the application of *The General Principles of Food Hygiene to the Control of Viruses in Food* (CXG 79-2012).

The EUMS support the recommendation to request additional information to JEMRA on the elements mentioned to be used as basis to determine if new work on the revision of the guidelines is necessary. The JEMRA work may include an assessment of other viruses such as sapovirus and picobirnavirus.

**II. Specific comments**

**Paragraph 5 Scope**

The EUMS consider a thorough assessment of JEMRA most essential before any new work on hepatitis E virus (HEV) in certain food commodities would be considered. The EUMS understand that this new work would involve the drafting of a new specific Annex for this purpose. However, the most relevant new scientific information available seems to be limited to an opinion of the European Food Safety Authority (EFSA) on this topic. That opinion includes an assessment of the importance of HEV in the EU, however, to decide on the need for

guidelines at global level, the importance should be estimated at global level and taking into account the global human health burden compared to other foodborne disease. In addition, the EFSA opinion indicates that the only efficient control option for HEV infection from certain food sufficient heat treatment. If this is confirmed by JEMRA, the usefulness of guidelines might be limited.

#### **Paragraph 6 Commodities**

The EUMS consider that the inclusion of a risk assessment in frozen fruit and vegetables should be included in the JEMRA work, and later on, considered in a revision of the Guidelines, considering the increasing number of outbreaks due to such food.

#### **Paragraph 8: Process and disinfection**

It is important to include the different control measures that can be implemented in industrial processes that allow satisfactory disinfection.

#### **Paragraphs 9 to 13 and 19 Testing of food**

The EUMS fully support a review of methods, for which there are a number of challenges (e.g. lack of discriminatory testing and identifying the most appropriate indicator to use when monitoring seawater quality)

#### **Paragraph 14 Control of HAV and NoV in bivalve molluscs**

The EUMS welcome the initiative to invite the CCFH to ask JEMRA to revise the guidelines with the scope to update them with a special focus on the revision of the analytical methods for relevant enteric viruses in food commodities including the potential utility of viral indicators or other indicators of contamination and the revision of the various risk assessment models with a view towards constructing more applicable models for wide use among member countries, including a simplified risk calculator.

The EUMS would like also to ask JEMRA to establish limits for NoV in live bivalve molluscs to be eaten raw, in particular oysters, in order to protect consumers from this risk.

#### **Paragraph 21 Recommendations**

Find some comments. In addition, the EUMS propose to go a little more into detail of the recommendations:

“CCFH is invited to consider the above information and determine whether additional information from JEMRA is required on one or more of the following elements listed below, to be used as basis to determine if new work on the revision of the guidelines is necessary:

- an up-to-date review of the foodborne viruses (**including emerging viruses**) and relevant food commodities of highest public health concern (**frozen food, for instance**);  
*(Rational: other types of viruses have been studied or emerged in recent years, and should be added to the scope of the guidelines. Moreover, important outbreaks were due to frozen foods (raspberries, for instance), so an update of food commodities involved would be useful).*
- **a review of knowledge on the “behavior” of viruses in natural conditions (for example: binding of NoV to intestinal tissues of oysters, natural depuration of**

**viruses in the seawater, risk of cross-contamination between batches, in production areas and in tanks)**

*(Rational: recent or on-going studies are related to the natural behavior of some viruses (for instance NoV capacity to bind to some tissues of molluscs), which could enrich the factors of risk to be considered or the options of treatment in the food chain. In addition, an assessment of how viruses react in seawater (for instance) would be interesting to assess: natural disappearance in seawater, risks of cross contamination from a batch of molluscs to another).*

- a review of the scientific evidence on prevention and intervention measures and the efficacy of interventions in the food continuum (**including the treatment of water in establishments manipulating molluscs and efficiency of purification**);

*(Rational: as bivalve molluscs are identified as major risk food type, options of treatments in the food chain should include the treatment of seawater used in storage or depuration devices.)*

- a review of the analytical methods for relevant enteric viruses in food commodities (**including information on infectious potential of viruses**);

*(Rational: some recent papers on infectivity of NoV have been published and should be included in the update of the guidelines.)*

- a review of scientific evidence on the potential utility of viral indicators or other indicators of contamination; and

*(Comment: Appropriate indicators could be useful in addition to analytical methods.)*

- a review of the various risk assessment models with a view towards constructing more applicable models for wide use among member countries, including a simplified risk calculator.

*(Comment: Quantitative risk assessment is indeed necessary, including some data on the “infectious dose: beside the “infectivity” issue, data on the quantity of viruses likely to cause diseases and more globally quantitative risk assessment need to be included in the scope of the guidelines).”*