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**FINAL**

**European Union comments**

**CODEX COMMITTEE ON FOOD HYGIENE**

**Forty-seventh Session**

**Boston, Massachusetts, United States of America,**

**9 – 13 November 2015**

**Agenda Item 5: Proposed draft guidelines on the application of general principles of food hygiene to the control of foodborne parasites**

**(CX/FH 15/47/6)**

*Mixed Competence  
European Union Vote*

**General comments**

- The European Union and its Member States (EUMS) would like to congratulate Japan and Canada for leading the work on the Proposed Draft Guidelines on the Application of General Principles of Food Hygiene to the Control of Foodborne Parasites and for the good progress made.
- Paragraph 13: Recommendations  
The EUMS do not see at this moment the need to elaborate specific annexes.
- Annex: Need for revision of numbering of sections, chapter, ... Some examples:
  - From section 7 it goes to section 9
  - From 5.5, it goes to 5.7
  - Under each division (A, B, C and D) of section 3, there are chapters 3.1, 3.2

The EUMS would like to submit the specific comments outlined below:

**Specific comments**

- Paragraph 5, third sentence:
  - It is proposed to add "fish, molluscs, crustaceans": "... Epidemiological data collection in meat producing animals, **fish, molluscs, crustaceans** and environmental parasite surveys could be effective in identifying hazards and collecting information to be used for the decisions making of risk management strategies..."
  - **Justification:** Also relevant for these groups of animals.

- Paragraph 8
  - An additional sentence is proposed at the end of the paragraph: "...viruses). The risk on direct human infection of parasites by drinking water can be managed by following the recommendations in the Code of Hygienic Practice for Collection, Processing and Marketing of Natural Mineral Waters (CAC/RCP 33-1985) and the Code of Hygienic Practice for Bottled/Packaged Drinking Waters (Other than Natural Mineral Waters) (CAC/RCP 48-2001)."
  - **Justification:** Drinking water might be a source of foodborne parasites and therefore should be addressed in the guidance. References to general codes on drinking water suffice since no specific control measures for parasites have been identified.
  
- Paragraph 12.
  - It is proposed to delete the most relevant parasites in the 4 food categories:
    - "Meat and meat products
    - ~~*Taenia solium*~~
    - ~~....~~
    - ....
    - ~~*Toxoplasma gondii*~~
  - **Justification:** The most important parasites in the different food categories are mentioned in section 3 (for example paragraph 20 for meat). In addition, the information is available in the report of the FAO/WHO Expert meeting.
  
- Paragraph 17, definition of "Larvae"
  - Proposed change: "**Larvae** - immature form of **helminths** ~~any parasite~~, before the assumption of the mature shape. It -can be infective or not."
  - **Justification:** not all parasites have a larvae stage, for instance Toxoplasma and other protozoa. They have an intermediate host, but no larval stage.
  
- Paragraph 22
  - The following change is proposed:
 

"22. Faeces of domestic and wild animals (e.g. Toxoplasma oocysts in felids), as well as human faeces (e.g. Taenia eggs), may contain parasites that are infective to domestic food-producing animals. Some parasites may also be transmitted to domestic animals or other animal hosts when these animals eat infected tissues from other animals. Where parasites will not be controlled at a later processing stage, ~~the feasibility of producing meat products with~~ concepts to avoid environmental contamination of foodborne parasites by controls during primary production should be considered before production begins. ~~A production area may be unsuitable if controls cannot be applied at primary production and they will not be controlled at later stages.~~ The risk associated with the introduction of organic material (e.g., faecal and other material that may contain oocysts or eggs) from non-food-producing animals into the

production environment should also be addressed."

- **Justification:** The recommendation seems disproportionately strict excluding certain areas from meat production, while a more positive recommendation should be given by deleting certain words with similar effect.
- Paragraph 26 should be deleted.
  - **Justification:** This is not possible in practice while a similar, more realistic recommendation is made in paragraph 27.
- Paragraph 28: Proposal of amendment:
  - "28. Good hygienic practices including management of waste, ~~such as maintaining and using sanitary toilet facilities should be in place and implemented. Toilets for staff and visitors should be provided.~~ Human faeces should be disposed of in such a way as to eliminate contact with animals or pasture land."
  - **Justification:** Covered by paragraph 36.
- Paragraph 29:
  - Feed for food-producing animals should be manufactured and stored in such a manner as to avoid parasite contamination. ~~Feed~~ **Feed** sources should conform to section 4, 5 and 6 of the Code of Practice on Good Animal Feeding (CAC/RCP 54-2004).
  - **Justification:** This paragraph is about feed and not food.
- Paragraph 33 should be deleted.
  - **Justification:** Guidance is repeated in paragraph 39.
- Paragraph 36: The following amendment is proposed:
  - "Humans may excrete parasite eggs that enter water and develop into larval stages that subsequently infect farmed fish. In order to minimize the opportunity for contamination of the production environment with parasitic stages from human faeces, ~~installation and use of the~~ on-farm sanitary facilities should be installed, e.g., functional latrines in the field, and an adequate means of hygienically washing and drying hands".
  - **Justification:** Editorial Amendment.
- Paragraph 37:
  - 37. Refer to Chapter 1.4. of the OIE Terrestrial Animal Health Code (2014). Surveillance and monitoring of foodborne parasites in food animals and in species that are potential sources of parasites could be effective in developing risk management strategies. Monitoring and surveillance can be useful as tools to verify the effectiveness of parasite controls; **and** should begin at primary production.
  - **Justification:** Editorial amendment.
- Paragraph 40: The following deletion is proposed:
  - 40. ~~Important milk transmitted foodborne parasites include Cryptosporidium spp. and Toxoplasma gondii.~~ Unpasteurized milk has been associated with outbreaks of cryptosporidiosis and toxoplasmosis. Contamination of unpasteurized milk with Cryptosporidium may result from unsanitary milking

conditions, such as when the udders are not properly cleaned. Outbreaks of toxoplasmosis have been associated with the consumption of unpasteurized goat and camel milk. Tachyzoites of *Toxoplasma* in recently infected animals may be excreted in the milk, resulting in milk-borne infection. ~~Unpasteurized milk has been associated with outbreaks of cryptosporidiosis in Australia and the United Kingdom.~~

- **Justification:**

Although *Cryptosporidium* may contaminate milk, it is not excreted in milk. For that reason milk is not mentioned as a food vehicle associated with *Cryptosporidium* in the report of the FAO/WHO Expert meeting. Therefore mentioning it in this section may be confusing; parasites can contaminate milk or other foods because of cross contamination (from faeces) but should not be considered as milk transmitted parasites.

The EUMS see no need to list specific countries.

- Paragraph 42. Proposal:
  - "42. Cats should be excluded from barns and food production, handling and storage areas used for dairy herds (e.g. cows, goats, sheep and camels). ~~Dairy herds should not be allowed to graze areas where Felidae are commonly found since cats are the only definitive hosts for *Toxoplasma gondii* and faeces from recently infected cats contain environmentally resistant oocysts that contaminate fields and other feeding areas.~~"
  - **Justification:** Not realistic.
- Paragraph 50 should be deleted:
  - **Justification:** There are no records of *Anisakis* in the flesh of large tuna but nobody has examined the flesh of large tuna, due to its sheer size/volume. Although empirical information suggests that the stomach and gut wall of large tuna (and other large fish) is too thick for *Anisakis* to penetrate and pass through, deletion is proposed because of the paucity of the scientific information, pending more robust data is made available.
- Paragraph 51: The EUMS propose a new wording turning this text into a recommendation, in the same line as the meat section (paragraph 36).
  - **“Humans may excrete parasite eggs that enter water and develop into larval stages that subsequently infect farmed fish. In order to minimize the opportunity for contamination of the production environment with parasitic stages from human faeces, on-farm sanitary facilities should be installed, e.g., functional latrines in the field, and an adequate means of hygienically washing and drying hands”.**
  - **Justification:** Animals are covered by points 56 and 57, but we consider that the recommendation for on-farm sanitary facilities should be clearly stated in a separate bullet.
- A new paragraph is proposed after Paragraph 51, rewording a former paragraph of an old version of the document.

- **“Material derived from on-board evisceration of fish showing signs of infection by parasites communicable to humans should not be disposed of at sea unless it has undergone a treatment that kills the parasites, in order not to maintain the parasite life cycle”.**
- **Justification:** Measures to avoid the maintenance of the parasite life cycle should be considered in the text.
- Paragraph 61:
  - Proposal: "61. Eviscerating fish without any undue delay during harvest is helpful to prevent parasite-migration of **Anisakidae larvae** from the viscera into the **flesh**-meat after harvest."
  - **Justification:** This is only relevant for Anisakidae larvae. In case of fish, "flesh" is a better wording than "meat".
- Paragraph 67, last sentence:
  - Proposal: "Adequate washing is one control measure feasible to be used in many cases, **although it should be noted that many parasite eggs or (oo)cysts are sticky and difficult to remove from fruits and vegetables .**
  - **Justification:** Consistency of this statement on washing at primary production with the one on washing at later stages (paragraph 88).
- Title 4.2 and 4.2.1: Proposal to delete.
  - **Justification:** There is no added value.
- Paragraph 83:
  - "83. Many parasites in food are susceptible to freezing. However, specific time/temperature combinations are required to inactivate parasites by freezing, and these are also dependent on the food type and portion size. Some parasites (e.g. *Trichinella nativa* and *T. britovi* larvae or eggs of *Echinococcus multilocularis*) are **relatively** resistant to freezing. *T. nativa* can survive up to 5 years at -18°C. **Strict conditions e.g. freezing of meat cannot at a core temperature of -18°C in the core for 3 days should** be recommended in areas where *T. britovi* is found in wild mammals. **Freezing for appropriate time at -80°C is needed to inactivate *E. multilocularis*.** "
  - **Justification:** Appropriate freezing, i.e. at a temperature of -18°C in the core of the meat product for 3 days, kills *T. britovi* larvae. Example of *E. multilocularis* can be added.