

04/01/2022

**CODEX COMMITTEE ON FOOD HYGIENE**  
**(Fifty second Session)**  
**Virtual, 28 February and 1, 2, 3, 4, 9 March 2022**

**European Union Comments on**

**Agenda item 5:**

**Proposed draft Guidelines for the management of Biological Foodborne  
Outbreaks (CX/FH 22/52/5)**  
**(CL 2021/72/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 the chairs for this new version and the efforts made to address comments made or to provide a clear justification when certain comments have not been addressed.

The EUMS can agree to progress this document to Step 8 for final adoption by CAC45. Some minor suggestions to improve the text have been made below.

**II. Comments on specific sections:**

**Introduction:**

No comments.

**Scope:**

No comments.

**Use:**

No comments.

**Definitions:**

The EUMS consider that no substantial changes should be made to the definitions, nor new definitions introduced, unless it would substantially improve the understanding of the text.

**Paragraph 16:** In the definition of “case-control study”, the meaning of “in which subjects are enrolled” is unclear. Deletion or rewording is proposed.

**Paragraph 21:** A “foodborne outbreak” is not a “number”. It is proposed to reformulate as follows: “Foodborne outbreak: The occurrence where the observed number of cases ...”.

#### **Foodborne Outbreaks – Preparedness System:**

**Paragraph 35, third sentence:** It is proposed to reformulate as follows: “The participants in the national network should be personnel from the ~~equivalent~~ authorities at the national level, equivalent to the same authorities/agencies that participate in the local networks”. Editorial.

**Paragraph 40, first bullet:** It is proposed to reformulate as follows: “~~a~~All available information is compiled to complete as much as possible an overview of the situation ~~as possible~~ and kept...”. Editorial.

**Paragraph 48:** The EUMS propose to revise the order of the text to facilitate readability: “48. Validated analytical methods should be used to isolate and identify causative agents. Traditional analytical methods (such as pathogen isolation) or Polymerase Chain Reaction (PCR)-based methods used for surveillance and monitoring are essential as the basis for detecting and investigating any outbreak. In some cases basic typing information such as the serotype may be enough to allow on a link between different human cases and between the human cases and the suspected food source, but often ~~it does~~ ~~they do~~ not allow a conclusion on such a link ~~between different human cases and between the human cases and the suspected food source.~~ ~~In some cases basic typing information such as the serotype may be enough to allow such linkage.~~ When further characterization is needed for outbreak investigation purposes, molecular or genetic typing methods can be and are increasingly being used.

**Paragraph 49, first sentence:** Abbreviations of molecular typing methods were already introduced in Paragraph 8. In addition, the link with the second sentence could be improved. Proposal for revision: “Molecular typing methods include ~~pulsed field gel electrophoresis (PFGE)~~ and ~~multiple locus variable number of tandem repeat analysis (MLVA)~~ and other genetic based methods such as WGS.”

**Paragraph 50, third bullet:** Core-genome MLST-based approaches are often used analytical methods and should therefore be referred to. Proposal for revision: “Sharing of WGS sequences in a form that is useful for comparison between the human health authorities and the food and veterinary authorities. Sharing of actual raw whole genome sequences and associated metadata is often most useful for comparing results obtained by various analytical methods, including both multilocus sequence typing (MLST)-based, core-genome MLST-based, and (single-nucleotide polymorphism (SNP)-based approaches.”

#### **Foodborne Outbreaks – Management:**

**Paragraph 85, 4th bullet:** The EUMS propose to amend “risk identification” into “hazard identification” to better align with WHO/FAO terminology.

**Paragraph 87:** The introductory sentence does not seem to fit with the bullet points below. Some redrafting should be considered. The introductory sentence could read: “Most relevant

practices that should be considered when conveying the risk communication message to the public and/ or food industry sector:”

**Paragraph 89 and 90:** There seems to be some duplication between “and in a way that protects personal information” (paragraph 89) and “Procedures should be in place to protect confidentiality of people affected by the outbreak.” (paragraph 90). It is therefore proposed to delete the wording in paragraph 89.

**Maintenance of the Networks:**

**Paragraph 96:** the deletion of this paragraph can be considered since fully developed in paragraphs 101 to 104.

**Annex I Structure of networks handling foodborne outbreaks:**

No comment

**Annex II Examples of requests for rapid risk assessment:**

In the first column, a slight reformulation could be considered (3 times): “~~If the~~ **Possible** question(s) is-related to....”

**Annex III Template for an outbreak analysis outbreaks:**

No comment