27 November 2025

CODEX COMMITTEE ON FOOD HYGIENE
(Fifty-fifth Session)
Nashville, USA
15 – 19 December 2025

European Union Comments on

Agenda item 7

REVISION OF THE GUIDELINES ON THE APPLICATION OF GENERAL PRINCIPLES OF FOOD HYGIENE TO THE CONTROL OF VIRUSES IN FOOD (CXG 79-2012)
(CX/FH 25/55/7)

(Reply to CL 2025/60-FH)

Mixed Competence
European Union Vote

In response to the request for comments, the European Union and its Member States (EUMS) would like to thank and congratulate Canada and the Netherlands for the very useful work undertaken as regards the revision of the *Guidelines on the Application of General Principles of Food Hygiene to the Control of Viruses in Foods* (CXG 61-2007).

The EUMS insists however on the full publication of the 2024 Joint FAO/WHO Expert Meeting report on the microbiological risk assessment of viruses in foods (Part 2: Prevention and intervention measures) without undue delay. Pending the publication of the full JEMRA report, it seems appropriate to keep this revision at step 3 and to delay the adoption for one year instead of having to revise these guidelines again in few years when all members have been able to consider the full JEMRA report.

Main body of document

The EUMS propose option 2 in the definition of frozen produce since there is no maximum temperature of -18°C for frozen produce in other Codex guidelines except for quick-frozen ones. A product may be safe at higher temperatures. The EUMS also believe that is better to refer to 'food safety' in the definition instead of 'food quality' in these guidelines which is about virus control.

Para 1, last sentence:

The EUMS propose to replace this sentence by: "**Foodborne viral infections are common, despite the measures already in place aimed at preventing foodborne illness.**" Rationale: The current wording may suggest that outbreaks caused by bacteria are uncommon. The phrasing used in the draft reviewed by the electronic working group provided a clearer representation and should be used.

Para 4, 7th bullet: The EUMS propose the following change: “Adequate hand washing practices (i.e. using soap and water) are more effective than the use of hand sanitizer for reducing the level of infectious virus in food handling settings. Most chemical disinfectants used in food establishments for cleaning and disinfecting surfaces **and hand sanitizers** do not effectively inactivate non-enveloped viruses, such as norovirus, HAV or HEV.” **Rationale:** This sentence is also relevant for hand sanitizers.

Section 13.1: in order to align the document with CXC 1-1969, the section 13.1 “Key aspects of GHPs" should be numbered as 13.2, as 13.1 in CXC 1-1969 corresponds to the description of products and processes.

Annex I

The EUMS propose to introduce a cross reference to CXG 100-2023 (use and reuse of water), subject to the placing of Annex II of these guidelines to step (5/8) at CCFH55, in paragraphs 5, 9, 15 and 23 considering the importance of water in these sections.

The EUMS request simplification of the section 8 reducing recommendations on water since covered by CXG 100-2023. However, the link between norovirus and HAV and possible human fecal contamination should be maintained.

The EUMS would like to suggest a Section 13.3 (See structure of GPFH) making a cross-reference to CXG 100-2023 since the use of water after primary production is hardly addressed in the proposed Annexes but very relevant for food hygiene.

Annex II

The EUMS propose to introduce a cross reference to CXG 100-2023 (use and reuse of water) in paragraph 10 considering the importance of water in this Annex.

The EUMS request simplification of the section 8.2.1 in Annex II reducing recommendations on water since covered by CXG 100-2023. However, the link between norovirus and HAV and possible human fecal contamination should be maintained

The EUMS would like to suggest a Section 13.3 (See structure of GPFH) in Annex II, making a cross-reference to CXG 100-2023 since water after primary production is hardly addressed in the proposed Annex but very relevant for food hygiene.

Annex III

Para 34: The EUMS propose the deletion of this paragraph. **Rationale:** Food business operators handle risks in relation to their production through their HACCP-based systems. Furthermore, according to the draft labelling of high-risk products should allow consumers to be informed about the risk of these products. It is somewhat unclear what type of information is meant in practice with “Labelling should specify the risk associated with the products or ingredients”. In addition, we note the provisions in section 14.3 about consumer education. In case point 34 is deemed necessary in this guidance, a clearer and more flexible formulation of the text should be considered.