CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Item 3a **CRD3**

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

Forty-eighth Session

Los Angeles, California, United States of America, 7 - 11 November 2016

COMMENTS ON PROGRESS REPORT ON THE JOINT FAO/WHO EXPERT MEETINGS ON MICROBIOLOGICAL RISK ASSESSMENT (JEMRA) AND RELATED MATTERS

(Comment of European Union and India)

EUROPEAN UNION

A.1 Control of STEC:

The European Union and its Member States (EUMS) very much appreciate the work done by the Joint FAO/WHO expert group. The EUMS can fully support the approach taken to estimate the global burden of foodborne STEC disease and source attribution, as well as these taken to address the hazard identification and characterization and to analyse current monitoring and assurance programs.

The EUMS would like to suggest the following:

- It would be desirable to roughly rank the global burden by STEC within the global burden of (microbiological) food-borne infections.
- It is important that the hazard identification clearly concludes on the possibility to differentiate pathogenic from non-pathogenic strains based on currently available analytical methods and to provide robust tools to do so. A ranking of pathogenicity might be used if considered more appropriate, e.g. non-pathogenic – low pathogenicity – medium pathogenicity – high pathogenicity.
- The EUMS will be happy to provide more information on monitoring and quality assurance of testing and reporting.

A.2 Water quality

EUMS are very supportive of the work and approach undertaken by FAO and WHO.

The EUMS recognise that, as clearly stressed in this paper, while risk assessment and management of water safety have been addressed extensively, the primary audience for this work has been the water management community. It does not explicitly address the food safety management community although reference to food production and food processing has been made.

A gap that may need to be addressed is the translation of this work into a format which is useful and relevant to food safety managers, taking into consideration some of the specific situations in which water is used along the food chain.

To this extent the EUMS can help the work undertaken by FAO and WHO by providing existing and available information within the EU through:

1. The outcome of research projects (the case of Vegi trade project),

   http://www.veg-i-trade.org/sci_res/pro_results/index.html

2. The ongoing Guidance document on addressing microbiological risks in fresh fruit and vegetables at primary production through good hygiene that we expect to be available by the end of 2016.

3. The JRC report proposing minimum quality requirements for reuse categories on agricultural irrigation and aquifer recharge covering the relevant aspects (e.g. water quality, application, monitoring) that we expect to become available by the end of 2016. These requirements should ensure a high level of health and environmental protection and thus provide public confidence in reuse practices.

B.3 GHP

THE EUMS very much appreciate the work done by the FAO to provide guidance in particular to small and medium size businesses. The EUMS have recently compiled EU and national guidance documents on the following web platform (please click on "Web Platform on Food Safety Management Systems including HACCP") at:

http://ec.europa.eu/food/safety/biosafety/food_hygiene/guidance/index_en.htm

We would be happy to add the provided links to the FAO documents on this platform.

INDIA

General comments: Codex work is at a higher stage in terms of conducting risk assessment of chemical contaminants and food additive and risk assessment models are already in place. Whereas in case of microbiological risk assessment there is a scientific gap and MRA models for conducting exposer assessment / dose response analysis are not available within scope of codex work. Non codex documents providing some information on MRA models are available and need to be evaluated for their suitability within the codex framework. In view of this background, India would like to recommend the following pertaining to MRA.

1. To establish generic models for exposer assessment and dose response analysis taking into consideration of developed/developing country
2. To establish the scientific document with well-established food pathogens associated with food outbreaks at global v/s national level
3. To ensure the suitability of generic models for conducting MRA with a specific pathogens causing food infection or food intoxication or toxico –infection
4. To establish whether it is possible to go for qualitative / or quantitative MRA
5. Peer review members on MRA should be represented by developed /developing country to ensure that the regional difference in terms of food habits/ individual immunity or other aspects affecting MRA are taken into consideration.
6. Point mentioned at sr no 1-5 are valid pertaining to **A.1 agenda on control of shiga toxin producing E.coli (STEC) relevant to agenda item 8**