



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX COMMITTEE ON FOOD HYGIENE

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DISCUSSION PAPER ON THE REVISION OF *GUIDELINES ON THE APPLICATION OF GENERAL PRINCIPLES OF FOOD HYGIENE TO THE CONTROL OF PATHOGENIC VIBRIO SPECIES IN SEAFOOD (CXG 73-2010)*

(Comments of European Union, Indonesia, Morocco and Philippines)

European Union

Mixed Competence

European Union Vote

The European Union and its Member States (EUMS) would like to thank Japan and New Zealand for the preparation of this discussion paper. In response to the request for comments, the EUMS would like to make the following comments.

I. General Comment

The EUMS support the recommendation resulting from the analysis to undertake new work to revise and update the appropriate text in CXG 73-2010. The EUMS would like to already make the following more general comments on such revision:

- There is a need to acquire further scientific knowledge on new matrices other than bivalve molluscs e.g. shrimps;
- Section V of the main guidelines (e.g. section 5.2.2.2) could specify adequate heat treatments in order to guarantee uniform practices.

II. Specific comments

Paragraph 5

The EUMS propose the following amendment: “However, new and highly pathogenic strains of V. parahaemolyticus have emerged with a significantly lower infectious dose 50 and different growth characteristics compared to the V. parahaemolyticus strains used in the previous risk assessments. Rational: it could be emphasized at the beginning of the sentence that the new strains belong to *V. parahemoliticus*.”

Paragraph 7

The EUMS would find it useful to specify ‘favourable conditions’ in terms of temperature, salinity, etc. .

Paragraph 9

The EUMS suggest to replace “most countries” by “some countries”.

Paragraph 10

It could be useful to mention examples of “control measures” that could be applied (for example high pressure or freezing).

Paragraph 14

The EUMS agree to mention that, in according to MRA 35, the climate change could play a role in increasing

risks associated with pathogenic vibrios (Baker-Austin et al., 2012), and in particular non-cholera vibrios such as *V. vulnificus*, *V. parahaemolyticus*, and non-O1 *V. cholerae* (Baker-Austin et al200., 2017).

Paragraph 15

The EUMS suggest to amend the first sentence as follows: “Outbreaks of food-borne cholera have been noted quite often **in some parts of the world** in the past 30 years...”

Paragraph 16

The EUMS suggest to replace “The dose response for humans is not known” by “the dose response for humans is still unclear (certain epidemiological data estimated it at 1000 cells) however more data are necessary”.

Annex on the control measures for *Vibrio parahaemolyticus* and *Vibrio vulnificus* in Bivalve Molluscs

The EUMS support the revision of Section 3 based on the information provided in MRA 35. The EUMS consider that a dedicated Annex for bivalve molluscs should be maintained taking into account the specificity of those products that cannot be compared with other fishery products.

The EUMS consider as fundamental the discussion about the laboratory methods, including the definition of possible limits (that could also be the absence) for *Vibrio parahaemolyticus* and *Vibrio vulnificus* in Bivalve Molluscs. This could take the form of a guidance document or good practice document that outline and describe in detail the most appropriate methods applicable, for what additional advice could be needed.

Indonesia

General Comment

Indonesia appreciates work done by Japan and New Zealand in preparing the discussion paper and project document on new work proposal for the revision of Guidelines on the Application of General Principles of Food Hygiene to the Control of Pathogenic *Vibrio* Species in Seafood (CXG 73-2010).

Indonesia supports the new work proposal, considering the need for guidelines that provide risk management options based on the latest scientific advice from FAO/WHO and to incorporate some relevant aspects of the revision of the General Principles of Food Hygiene (CXG 1-1969).

Morocco

Les nouvelles informations fournies par la FAO/OMS peuvent offrir des avantages notables aux autorités compétentes et aux entreprises du secteur alimentaire afin de minimiser les risques associés aux vibrions pathogènes

Position nationale 20 :

Le Maroc est en faveur de la révision de ces directives.

Philippines

Comment Type	Category	Proposed Change	Comment
General	Substantive	N/A	<p>The Philippines supports the proposal for CCFH to undertake new work to revise and update appropriate texts in CXG 73-2010 (Guidelines on the Application of General Principles of Food Hygiene to the Control of Pathogenic <i>Vibrio</i> species in Seafood) following the results of the JEMRA report on the advances in science and risk assessment tools for <i>V. parahaemolyticus</i> and <i>V. vulnificus</i> associated with seafood.</p> <p>Rationale:</p> <p>The proposed new work will provide guidance to the Philippines in the appropriate updating of its national</p>

Comment Type	Category	Proposed Change	Comment
			<p>standards, particularly the following:</p> <ol style="list-style-type: none"> 1. Code of Practice for the Processing of Cephalopods (PNS/BAFS 299:2020) 2. Code of Practice for the Processing of Lobsters (PNS/BAFS 298:2020) 3. Code of Practice for the Processing of Shrimps and Prawns (PNS/BAFS 297:2020) 4. Code of Practice for Fresh and Quick Frozen Raw Scallop Products (PNS/BAFS 279:2019) 5. Code of Practice for Live and Raw Bivalve Mollusc (PNS/BAFS 236:2018) 6. Chilled or Frozen Crabs - Code of Practice (PNS/BAFS 328:2022) <p>The Philippines would also like to underscore the relevance of providing practical and cost-effective measures in controlling pathogenic <i>Vibrio</i> species in seafood, particularly time-temperature control and relaying, in the proposed revisions. These control measures are currently provided for in the abovementioned national standards, which may also need to be consequently updated following the recommendations from JEMRA.</p>