



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FOOD HYGIENE

Fifty- third Session

San Diego, United States of America

29 November – 2 December 2022 and 8 December 2022

Comments of United Kingdom

Agenda Item 7

Discussion paper on revision of the Guidelines on the Application of General Principles of Food Hygiene to the Control of Pathogenic *Vibrio* Species in Seafood (CXG 73-2010). Comments in reply to CL 2022/49/OCS-FH.

General Comments

The United Kingdom thanks Japan and New Zealand for their work in preparing this discussion paper and generally support a revision of the Guidelines on the Application of General Principles of Food Hygiene to the Control of Pathogenic *Vibrio* Species in Seafood (CXG 73-2010). The edits outlined by Japan and New Zealand appear to cover all of the major changes that have taken place over the last decade.

The UK notes significant new information has now emerged since the publication of CXG 73-2010. Recent and highly pathogenic strains are now circulating in the environment (such as *Vibrio parahaemolyticus* ST36 isolates), with more epidemiological evidence from various sources (USA and China) indicating greater risks associated with these bacteria. There are better risk prediction tools and improvements to detection and molecular methods, in particular the use of whole genome sequencing for studying outbreaks and clinical investigations. Additionally, there are changing demographics/epidemiological factors (e.g. increased numbers of “at risk” individuals, more people eating seafood, increased trade in shellfish etc); all which represent key aspects in terms of modulating human health risks associated with these pathogens.

The UK suggests the following comments for consideration:

Paragraph 14:

It may be useful to add that non-O1 and non-O139 detections/cases show general increases in both of these strains and are more commonly associated with seafood than O1 and O139.

- CROWE, S., NEWTON, A., GOULD, L., PARSONS, M., STROIKA, S., BOPP, C., . . . MAHON, B. (2016). Vibriosis, not cholera: Toxigenic *Vibrio cholerae* non-O1, non-O139 infections in the United States, 1984–2014. *Epidemiology and Infection*, 144(15), 3335-3341. doi:10.1017/S0950268816001783
- Cholera and Other *Vibrio* Illness Surveillance (COVIS) <https://www.cdc.gov/vibrio/surveillance.html>

Paragraph 15:

We suggest that this paragraph could provide some additional clarity on which serotypes are involved with outbreaks of foodborne cholera. Our understanding is that O1 and O139 strains are rarely found in seafood or seawater and are more commonly associated with fresh water, and that O75 and O141 are more commonly found in seawater and seafood.

Paragraph 19:

With regards to the temperature range and salinity - *V. vulnificus* occurs naturally as a common inhabitant in warm (13-30°C), and brackish, low salinity (2-25 ppt NaCl) waters.

- Reference: Baker-Austin, C., Oliver, J.D., Alam, M. *et al.* *Vibrio* spp. infections. *Nat Rev Dis Primers* 4, 1–19 (2018). <https://doi.org/10.1038/s41572-018-0005-8>.

Agenda Item 8

DISCUSSION PAPER ON REVISION OF THE GUIDELINES ON THE APPLICATION OF THE GENERAL PRINCIPLES OF FOOD HYGIENE TO THE CONTROL OF VIRUSES IN FOOD (CXG 79-2012)

Comments in reply to CL 2022/50/OCS – FH

General Comments

The United Kingdom thanks Canada and the Netherlands for their work in preparing this discussion paper. The UK considers that given the huge push forward in the published science including many significant developments in the field since the guidelines were published in 2008, the UK supports the recommendation to request additional information from JEMRA, on all the elements identified in the recommendations.

The UK also suggests additional comments for consideration:

Scope

Paragraph 5

The UK recognises that HEV is a global issue however currently there is much uncertainty surrounding infection pathways, control and inactivation of the virus that will likely impact on the efficacy of any guidance. Detailed consideration by JEMRA is required on these issues along with an understanding of the global impact of the disease before developing guidance.

Paragraph 6

The UK agrees that frozen produce is a commodity that would benefit from risk assessment carried out by JEMRA.

Comments on recommendations

an up-to-date review of the foodborne viruses and relevant food commodities of highest public health concern:

- The UK would also highlight the findings of the 'Review of food-virus combinations of concern or potential concern for food safety in the United Kingdom' which considered the risks from composite foods (Norovirus), meat and meat products (Hepatitis E), and milk and dairy products (tick-borne encephalitis). Any risk assessment should also consider emerging commodities/novel foods such as seaweed-based products which may have potential to carry viral contamination.

Reference: <https://www.cefas.co.uk/media/fo3jnk4e/c8351-review-of-food-virus-combinations-website-version-011122>

a review of the analytical methods for relevant enteric viruses in food commodities:

- The UK supports a review of analytical methods. Our National Reference Laboratory for Foodborne Viruses recently undertook a review on the current state of methods for detection of infectious foodborne viruses, which may be useful to JEMRA.

Reference: <https://www.cefas.co.uk/media/wl4pcbhk/c8351-final-report-v1-website-version-011122.pdf>

a review of scientific evidence on the potential utility of viral indicators or other indicators of contamination:

- Based on the limitations of bacterial indicators, it is appropriate to review work on alternative indicators such as bacteriophages to determine if guidelines can be updated to reflect developing knowledge in this area.