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CODEx COMMITTEE ON FOOD HYGIENE

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Proposed draft revision of the *Guidelines on the application of general principles of food hygiene to the control of *Listeria monocytogenes* in foods* (CXG 61-2007)

(Comments of India, Malaysia, Nigeria, Russian Federation, Singapore, Uganda, United Republic of Tanzania (URT))

India

India appreciates and supports the work done by the chair and co-chairs of the EWG in drafting the revised Guidelines on the application of general principles of food hygiene to the control of *Listeria monocytogenes* in foods (CXG 61-2007)

➤ India would like to propose following technical comments on the draft guidelines:

1. In section 1, paragraph 13, India proposes to add the following line after the last sentence which states that “*For some RTE foods, an additional listericidal treatment after final packaging may be introduced to further reduce the risk of listeriosis.*”:

However, post-packaging listericidal treatments may alter product quality and shelf-life.

Rationale: To provide a critical qualification regarding the potential negative impact of the suggested treatment on product attributes.

2. In Section 11.1.2, India proposes to revise the first sentence of paragraph 83 as “~~To prevent aerosols from contacting RTE foods, food contact surfaces and food packaging materials, the use of high-pressure water hoses should be avoided~~ **wherever there is a possibility of formation of aerosols and those aerosols leading to contamination of RTE foods, food contact surfaces and food packaging materials.**”

Rationale: The use of high-pressure hoses does not lead to formation of aerosols in all circumstances and avoiding high-pressure hoses in all situations might not be practical.

➤ India proposes following editorial corrections to the draft revised guidelines:

1. In the third sentence of paragraph 3, the spelling of “chronic sequalae” should be revised as “chronic sequelae”.
2. In the bullet points of paragraph 10, “*L. monocytogenes*” should be italicized
3. Paragraph 80 may be revised as “Experience indicates that over-reliance on the ~~chemicals cleaning and disinfection chemicals~~ alone for cleaning can lead to increased levels of microbial contamination. **The** These chemicals must be applied at the recommended use-concentration, for sufficient time,....”

Rationale : To add necessary specificity and clarity regarding which chemicals are being referred to.

Malaysia

Malaysia appreciates the work of the Electronic Working Group chaired by the United States of America, co-chaired by Canada, France, and China on the Proposed Draft Revision of the Guidelines on the Application of General Principles of Food Hygiene to the Control of *Listeria Monocytogenes* in Foods (CXG 61-2007).

Malaysia proposes to remove the words "(A-L)" in Para 4 of *Annex I: Recommendations to Food Business Operators for an Environmental Monitoring Programme for Listeria Monocytogenes in Primary Production and Processing Areas*, since the factors are no longer listed by alphabetical order as in the previous guideline.

Nigeria

Nigeria supports the recommendation that the document scientific information be enhanced especially with regard to thresholds and model parameters (pH, Aw, temperature, shelf life).

Rationale

JEMRA has identified critical growth parameters for *Listeria monocytogenes* that should be integrated into the document to help users quickly determine if a Ready-to-Eat (RTE) food supports its proliferation.

Russian Federation

We propose to take into account the following comments to the text of Appendix 3 "Recommendations to competent authorities and food business operators for developing and applying microbiological criteria for listeria monocytogenes in ready-to-eat foods":

- Paragraph 20 shall be supplemented with a note on the advisability of testing samples from several batches of the same type of product (at least 2), and, if necessary, conducting an independent assessment in an accredited laboratory. Paragraph 21 of the same section, concerning the criteria for Listeria growth in ready-to-eat products, shall be supplemented with references to publications confirming the absence of Listeria monocytogenes growth when Listeria growth is obtained at a level of no more than (on average) 0.5 lg CFU/g of the initial growth.

Singapore

Singapore thanks the United States for chairing the EWG and Canada, France, and China for their co-chairmanship in developing these comprehensive revisions. We appreciate the systematic incorporation of JEMRA recommendations from MRA38 and MRA47 and the extensive consultation process that has resulted in significantly improved guidelines.

Regarding the revised CXG 61-2007:

Singapore supports the proposed draft revision of the Guidelines on the Application of General Principles of Food Hygiene to the Control of Listeria monocytogenes in Foods (CXG 61-2007).

The comprehensive revisions provide updated, science-based guidance incorporating the latest JEMRA recommendations and achieve full alignment with CXC 1-1969. We particularly appreciate the practical approach to environmental monitoring and the enhanced recognition of consumer behaviour in risk assessment.

Regarding the updated definitions:

Singapore supports the updated "Ready-to-eat food" definition that includes "reasonably foreseeable" consumption patterns, as this reflects realistic consumer behaviour and provides appropriate flexibility for risk assessment. We also support the new "listericidal treatment" definition with validation requirements, which provides clear guidance for food business operators.

Regarding restructured Annexes:

Singapore supports the restructured annexes with updated titles that clearly identify intended users. The enhanced content, including challenge studies guidance and modern isolate characterization techniques, provides valuable tools for both food business operators and competent authorities in implementing effective *L. monocytogenes* control programmes.

Uganda

Uganda appreciates the work of the Electronic Working Group chaired by the United States of America, and the co-Chairs - Canada, France, and China for the work of revising the Guidelines on the application of general principles of food hygiene to the control of Listeria monocytogenes in foods (CXG 61-2007)

Uganda generally supports the proposed draft Guidelines as presented in Appendix I noting that it has taken into consideration the latest scientific advice provided by JEMRA; and also provides the following comment:

On Section 6, Para 27, Regarding the definition of “Ready-to-Eat Food” in Appendix I, Uganda notes that the definition is not consistent with existing definitions in other Codex texts. In particular, it is unclear whether the definition should be specific to *Listeria monocytogenes* or be applied more generally, as is currently done in the Regional Guidelines for the Design of Control Measures for Street-Vended Foods (Africa) (CXG 22R-1997) and the Regional Code of Hygienic Practice for Street-Vended Foods in Asia (CXC 76R-2017).

Uganda therefore proposes harmonizing the definition across relevant Codex documents and recommends deleting the term “listericidal” from this Codex text to ensure its application across different Codex texts and hence ensure consistency.

New proposed definition to read as “Any food (raw or processed) for which it is normally, or reasonably foreseeable that it will be, eaten without further **listericidal** treatment.” Uganda further proposes that the definition of ready-to-eat foods should be included in revised General principles of food hygiene (CXC 1-1969) to ensure consistent application and referencing by Codex texts.

Conclusion: Uganda appreciates the work done by the EWG in reviewing the guidelines and supports the proposed draft Guidelines as presented in Appendix I to progress to the next Codex Step Process with modification of definition of ‘Ready-to-Eat Food’.

United Republic of Tanzania (URT)

Tanzania position: Tanzania appreciates the work done by the EWG in reviewing the guidelines and supports the proposed draft Guidelines as presented in Appendix I.