



JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEx COMMITTEE ON FOOD HYGIENE

Fifty-fifth Session

Nashville, Tennessee, United States of America

15 - 19 December 2025

Comments of the International Union of Food Science and Technology (IUFoST)

The objective of this Conference Room Document (CRD) is to provide comments on behalf of the International Union of Food Science and Technology (IUFoST), an observer organization of the Codex Alimentarius Commission, on agenda items tabled at the 55th Session of the Codex Committee on Food Hygiene (CCFH55).

The International Union of Food Science and Technology (IUFoST) represents the largest gathering of food science and technology scientists from around the world, made of over 300,000 scientists from more than 100 countries.

The comments included in this document are the result of the contribution of an Expert Group of the Global Food Regulatory Science Society (GForSS), the disciplinary group of IUFoST on Food Regulatory Science.

AGENDA ITEM 5

CX/FH 25/55/5

Agenda Item 5: Guidelines for the safe use and reuse of water in food production and processing (CXG 100-2023): Proposed draft Annex II on Fish and fishery products (FFP) and Annex IV on Water fit-for-purpose assessment, safety management, and technologies for recovery and treatment of water for reuse (Step 4)

IUFoST would like to congratulate the Electronic Working Group (EWG) chaired by the EU and co-chaired by Morocco, Honduras, Mauritania, India, and the International Dairy Federation (IDF) for the level of progress achieved in the development of the current draft.

IUFoST would like to offer the following comments on the different annexes proposed as follows:

Annex II: Fishery and fishery products

The following items may be considered as comments or questions that may be addressed to CCFH55:

- ♣ Paragraph 11 could be deleted: the current structure and wording may be confusing and overlaps with definitions and other sections of the document. For example:
 - In the first sentence, it is not clear what “more general use” and “more feasible, effective and practicable” are compared to.
 - Indicating that clean water is FFP for almost all uses of water may be confusing.
 - The definitions of potable water, clean water, and other FFP waters are more clearly explained in paragraph 17.
- ♣ Figure 4, option 2 is preferred as it is more straightforward, but the proposed aesthetics could be improved. Also, the arrow from “A fit-for-purpose assessment...” to “The water is FFP for...” should be removed. Q3 should more clearly indicate that the measures are implemented, not only available.
- ♣ Section 6, option 2 is preferred as it is consistent with the other subsection titles (i.e., based on type of water). However, para. 22 indicates that “Ice... may be manufactured onboard using brackish water or seawater”. It would be important to clarify if this ice can be used in direct contact with fish/fishery products.

Other comments:

- ♣ Section 1, para. 5 is unclear. May need grammar review.
- ♣ Section 1, para 6: it is unclear what “more general use” and “more feasible, effective and practicable” are compared to.
- ♣ Section 4, “refrigerated seawater”: the term “clean” seawater is introduced. It would be good to refer the reader to a section of the document where this is addressed or to add the definition here.
- ♣ Section 6, para. 14: It is unclear why the last sentence is included. Does it imply any water can be used for these applications?
- ♣ Section 6, para. 17, letter b: Does the statement that clean water “should at least comply with the microbiological safety of potable water” imply that, for example, clean water could have chemical contamination levels above those permitted in potable water?
- ♣ Section 8, para. 32, 2nd bullet point: same comment as above.
- ♣ Section 6, para. 17, letter c: the concept of FFP assessment is introduced. It would be good to refer the reader to a section of the document where this is addressed. Also, could the implementation of control measures “upgrade” other FFP water to clean water?
- ♣ Section 8, para. 32: the last bullet point may need grammar review.
- ♣ Section 8, para. 33: replace “biohazards” with “microbiological hazards”.
- ♣ Figure 2: the answer “Yes” to Q5 is missing. The answers to Q7 are strange. Since this is a decision tree, direct guidance was expected, but these are just classifications of types of water.
- ♣ Section 9.4, para. 77: the last sentence is contradictory. It comes after a strong case on the limitations of testing for surrogate microorganisms yet fully supports this approach and seems to dismiss the value of pathogen testing. Could clarify that this refers to routine pathogen testing. Also, para. 78 suggests considering testing for pathogens.

Annex IV: Section 6.7., para. 39 could be integrated into this Annex as well for improved clarity:

Routine testing of water for pathogens is not recommended, because the level of pathogens in water, if present, are likely to be low making detection by reasonable sampling plans improbable. It is more practical to test for suitable indicator microorganisms to verify process control(s) are effective and to identify potential out-of-control situations. Suitable indicator microorganisms generally occur in water at levels that allow quantification. Notwithstanding, enhanced sampling and testing for pathogens may be warranted for validation of reconditioning processes or during an event where a loss of control may have resulted in water becoming contaminated with pathogens.

- ♣ Section 9.4, para. 82: it seems unusual to include additional testing as a corrective action. The corrective action should address problems identified via testing.
- ♣ Table 1, title: delete “waterborne”

Annex IV: Water fit-for-purpose assessment, safety management, and technologies for recovery and treatment of water for reuse

This Annex is very thorough and straightforward. Only 1 comment is noted:

- ♣ Section 5, para. 10: the 3rd bullet point seems to include 2 separate cases. Could be separated in 2 bullet points.

IUFoST thanks the committee for considering the proposed changes as they represent important clarifications (particularly for Annex II). This would help avoid potential ambiguity and ensure that the proposed guidance provide clear, practical, and consistent direction to both producers and regulators in mitigating risks associated with such production practices. Clear and unambiguous guidance will be essential to support effective implementation across different regulatory and operational contexts.

AGENDA ITEM 7

CX/FH 25/55/7

Agenda Item 7: Proposed draft revision of the *Guidelines on the application of general principles of food hygiene to the control of viruses in food* (CXG 79-2012) (Step 4)

IUFoST thanks members of the EWG chaired by Canada and co-chaired by The Netherlands for the progress achieved in the development of the updated guidelines which include revisions to the main text and updates

to Appendix I (*Control of Norovirus and Hepatitis A Virus (HAV) in Bivalve Molluscs*), and to Appendix II (*Control of Norovirus and Hepatitis A Virus (HAV) in Fresh and Frozen Produce*), as well as a first draft of Appendix III (*Control of Hepatitis E Virus (HEV) in Pork and Wild Game Meat*).

The revised guidelines are very comprehensive and reflect advancements in food virology since 2012. The following comments are proposed by IUFOST:

- The definition of enteric virus indicates that they replicate in the gastro-intestinal (GI) tract or in the liver. This may be confusing. "Enteric" usually refers to replication in the GI tract and also refer to the ability of fecal-oral transmission. HAV and HEV are not typical enteric viruses since their replication site is the liver, but they are enterically transmitted. However, viruses that only replicate in the liver (e.g., HBV, HCV) are not enteric viruses (not shed in feces nor transmitted via fecal-oral route).

Also, it may be worth adding to the definition that zoonotic enteric viruses may also be transmitted through water contaminated with animal feces (e.g., HEV-1, HEV-2), even if Annex III focuses on HEV and meat.

- The chairs' decision to defer revisions related to surface disinfection, heat treatments, and other specific process steps until the final report is published is well motivated. It is important however to emphasize that update is critical, considering the advancements since the original publication of the guidelines (2012) and the relevance of this content to FBOs. Updates on these matters should be included in the guidelines' main text as well as in the Annexes.
- Regarding the definition of frozen produce, our proposal is to consider Option 1 to be more appropriate as it includes a reference temperature of regulatory relevance (-18 °C or colder). Also, this is more clearly understood by FBOs than "below its freezing point", as in Option 2. It may also be relevant to include a more general definition of frozen food or a definition of frozen meat, which could be important for HEV.

Annex III: Control of Hepatitis E Virus (HEV) in Pork and Wild Game Meat (1st Draft)

The position of the chairs that this Annex is necessary given the public health relevance of the virus-food combination is well motivated. The following comments are noted.

- Section 1, para. 3: The risk of foodborne HEV infection *mainly* arises from...

Also, specific high-risk product types could be mentioned as examples (fresh pork liver pâtés, figatellu sausages)

- Section 8.2 could mention the importance of water quality and feed hygiene (to prevent infection among animals through contaminated feed/water)
- Section 13.1.1 should mention that HEV is highly resistant to freezing
- Section 14.2: ...or cook these products *to achieve full viral inactivation*, in line with...

Section 14.3 could mention recommended minimal safe cooking temperatures for viral inactivation

AGENDA ITEM 8

CX/FH 25/55/8

Agenda Item 8: Proposed draft revision of the *Guidelines for the control of Campylobacter and Salmonella in chicken meat (CXG 78-2011)* (Step 4)

IUFOST would like to thank the EWG chaired by the United States and co-chaired by Australia, Brazil, Denmark, Honduras, and India, which led the preparation of the updated guidelines. The proposed draft revision is a significant improvement of the 2011 document. The draft is very clear and very comprehensive.

IUFOST would like to offer the following **minor** comments for consideration by CCFH55.

- Section "Retail and Food Service (Step 6.4)" could address the sale of refrigerated poultry that was previously frozen, and the related requirements on safe holding temperature, handling, and labeling.
- Section "Consumers (Step 6.6)", letter a, could mention safe thawing practices.