



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 *Listeria monocytogenes* in Foods (CXG 61-2007)

Comments of Argentina, European Union, Singapore and Thailand

Argentina

Argentina agradece a Canadá, Francia y Estados Unidos de América la elaboración del Proyecto de documento, está de acuerdo con el avance de la revisión del documento y manifiesta su intención de participar con observaciones durante el desarrollo del mismo.

European Union

In response to the request for comments, the European Union and its Member States (EUMS) would like to make the following comments.

I. General Comment

The EUMS would like to thank and congratulate Canada, France and the United States of America with the drafting of the very useful discussion paper on the 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 EUMS can support the recommendation that CCFH undertakes new work to revise and update the appropriate text in CXG 61-2007, subject to the considerations of the comments made below.

The EUMS also welcomes the additional work carried out by JEMRA in 2022 and 2023 but insists on the full publication of the meeting reports without undue delay.

II. Specific comments

Appendix 1, Part 1

Recommendations of control of *L. monocytogenes* at primary production are limited in CXG 61-2007 and quite general (referring to other standards). A revision is welcomed but can probably be addressed by a revision of Section III of the main document. More specific recommendations might be useful.

The FAO/WHO Expert reports recommend evaluating the virulence of strains since substantial differences exist. Also, the impact of susceptibility of different populations was assessed. This should be reflected in the recommendation of control measures.

The EUMS strongly support a further elaboration of environmental monitoring and control, including when there is evidence of persisting contamination. Annex I should be extended for that purpose, including possible examples. A merging of Annexes I and III could be considered (both are relevant for environmental control).

The use of Whole Genome Sequencing (WGS) should be encouraged and the development of a data base with WGS profiles from human, animal food and environment samples, and their comparison should be recommended.

Finally, the EUMS would like to emphasize the importance to clarify the responsibility of the FBO to consider the reasonably foreseeable conditions of use of the food. This should be an evident part of the control measures of *L. monocytogenes* by FBO's in order to account for consumer behaviour. Rationale: Sometimes the intention of the FBO, in line with the labelling of the food product (e.g. cook thoroughly), might not be the way in which consumers will prepare the food in practice (e.g. only a simple warming of the product or even not cooked at all). This could be seen as misuse of the product but when this is likely to be done in practice these consumers habits need consideration.

Appendix 1, Part 2

The EUMS strongly support the recommendation to provide guidance in assisting to the determination of growth of *L. monocytogenes* in RTE food where growth occurs (e.g., challenge tests performed according to the ISO 20976-1 standard).

Singapore

Singapore extends its appreciation to Canada, France, and the United States of America for their efforts in preparing the project document.

Acknowledging JEMRA's latest scientific advice (MRA 38 and subsequent JEMRA meetings in 2022 and 2023) since the publication of the guidelines in 2007, Singapore recognises the need for updates and revisions in the current CXG 61-2007 text. We fully support the new work aimed at revising the guidelines, which will be considered by CCFH54.

Thailand

Thailand does not object the proposal of new work on this issue. However, we would like to provide some comments to the project document as follows:

Section 1 Purpose and scope of the standard

We would like to ask for clarification on the scope of the standard. Generally, the scope of the other Guidelines or Code of Practice are to equally provide recommendations or control measures to both government and food business operators (FBOs). However, the scope of this Guidelines emphasizes mainly on the government. As both government and FBOs can use this Guidelines, we would like to propose modifying the text in Section 1 to focus on both parties to improve the practices of the FBOs.

Section 3 Main aspects to be covered

In bullet point 2, we would like to ask for a clarification whether or not the climate change affects the control measures recommended in this Guidelines. In case the climate change is not going to alter the practices recommended in this Guidelines, we would like to propose deletion from this bullet point.

In bullet point 3, the molecular and genomic-based approaches should only supplement the conventional cultural methods as those more advanced approaches require more resources compared to the conventional methods. The molecular and genomic-based approaches should not be used for routine monitoring. We would like to propose careful consideration when revising related Section in the EWG to avoid stringent requirements.