



## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX COMMITTEE ON FOOD HYGIENE

Fifty-fourth Session

Nairobi, Kenya

11 - 15 March 2024

### Proposed draft revision on the Guidelines on the Application of General Principles of Food Hygiene to the Control of Pathogenic *Vibrio* Species in Seafood (CXG 73-2010) at Step 4

#### Comments of the United States of America

The United States of America thanks Japan and Chile for summarizing and revising the Guidelines (Appendix I), considering the feedback from EWG members received during the EWG session.

The draft revised Guidelines include several definitions which overlap with each other and are not clear. Specifically, the definitions for “partially treated” and “post-harvest processes” are almost identical, and it is not clear why both terms are needed. Further, the definitions for both “partially treated” and “post-harvest processes” include the concept of a “significant” reduction. The concept of a significant reduction overlaps with established definitions for control measures generally understood to provide sufficient lethality to be considered fully treated.

Further, the definition for “treated / thoroughly treated” contains the examples of “heat treatment and high pressure”, however both heat treatments and high pressure could also be “partial treatments” depending on the parameters of the treatment. Additionally, where the term “treated / thoroughly treated” could be used in the scope of the Annex, the term “vibriocidal treatment” is used instead. A footnote in paragraph 12 of the main guidelines further defines “treated” to mean “any vibriocidal treatment (e.g., heat treatment, high pressure.)”

Finally, the Annex contains several paragraphs in which the language used to define the terms is included in the text instead of the defined term.

#### Specific Comments to Agenda 7 CX/FH24/54/8 Appendix I:

1. Revise the definitions of “Partially treated” and “Treated / Thoroughly treated”:
  - **Partially treated** - Seafood that has received a treatment intended to reduce or limit, but not eliminate, *Vibrio* spp. in seafood.
  - **Treated / Thoroughly treated** - Any treatment intended to eliminate levels of *Vibrio* spp. reasonably likely to be present in seafood.
2. Delete the definition for “post-harvest processing” in the Annex and instead use the defined term “partially treated” when needed in the text.
3. Delete footnote 5 in paragraph 12 of the main document.
4. Replace the term “vibriocidal treatment” in the scope of the Annex with the term “treated / thoroughly treated”.
5. Make the following related edits in the Annex to use the defined terminology:
  - a. Paragraph 17 - Bivalve molluscs destined to be consumed live or untreated raw should be handled separately from those harvested in other areas destined for ~~post-harvest processing or other~~

treatment (including partial treatment) to avoid cross contamination.

- b. Paragraph 22 - Any control measures or practices selected ~~to significantly reduce or limit but not necessarily completely eliminate~~ as a partial treatment for *V. parahaemolyticus* and *V. vulnificus* in bivalve molluscs (e.g., freezing, high pressure and mild heating), should be adequately validated to ensure that the control measure is effective. They should also be approved by the competent authority. Such validated control measures/practices should be implemented under the HACCP system.
- c. Paragraph 24 - Bivalve molluscs destined to be consumed live or untreated raw should be distributed separately from those destined for ~~post-harvest processing or other~~ treatment (including partial treatment).
- d. Paragraph 25 - Control measures should be in place to avoid cross contamination between bivalve molluscs destined to be consumed live or untreated raw and those harvested in other areas destined for ~~post-harvest processing or other~~ treatment (including partial treatment).
- e. Paragraph 44 - *V. parahaemolyticus* is generally more resistant than *V. vulnificus* to any given treatment. Therefore, a process that is effective for *V. vulnificus* may not be as effective for *V. parahaemolyticus*. Any control measure or practice selected as a partial treatment for ~~to significantly reduce or limit but not necessarily completely eliminate~~ *V. parahaemolyticus* and *V. vulnificus* in bivalve molluscs should be adequately validated to assure that the control measures are effective. Such validated control measures/~~practices as practiced~~ should be implemented under ~~an~~ the HACCP system.