

1 **Response to questions posed by the Food and Drug Administration**  
2 **(FDA): *Cyclospora cayetanensis* in Produce**

3  
4 **National Advisory Committee on Microbiological Criteria for Foods<sup>1</sup>**  
5

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<sup>1</sup> Participating agencies include the U. S. Department of Agriculture, Food Safety and Inspection Service; U.S. Department of Health and Human Services, Food and Drug Administration, and Centers for Disease Control and Prevention; U.S. Department of Commerce, National Marine Fisheries Service; and U.S. Department of Defense, Veterinary Service Activity. Disclaimer: Mention of trade names or commercial products in this publication is solely for the purpose of providing specific information and does not imply recommendation or endorsement by the U. S. Department of Agriculture and other participating agencies.

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**Executive Summary of Findings**

*Cyclospora cayetanensis* (*C. cayetanensis*) is a coccidian protozoan parasite, belonging to the phylum Apicomplexa, order Eucoccidiorida, family Eimeriidae, described between 1993 to 1994 as a newly identified human gastrointestinal pathogen. Within the genus *Cyclospora*, only *C. cayetanensis* is known to infect humans, however, recent advances in genomics separated *C. cayetanensis* into 3 species, with two new species that are also parasitic to humans (*Cyclospora ashfordi* sp. nov. and *Cyclospora henanensis* sp. nov.) recently proposed. The parasite produces oocysts that are resistant to harsh environmental conditions and to many chemical treatments commonly used to reduce the presence of bacterial pathogens in the specialty crop production environment and in agricultural inputs (e.g., agricultural water). *C. cayetanensis* is the etiologic agent of cyclosporiasis, its host range is limited to humans. Detected in association with human illness in many parts of the world, *C. cayetanensis* previously was considered to be a pathogen acquired during childhood in developing nations. In the United States, cyclosporiasis was previously associated with international travel or consumption of contaminated imported foods. In recent years, the U.S. has seen an increase in cases and positive samples associated with produce, both as raw agricultural commodities and fresh-cut produce, grown in the U.S. However, laborers with the history of recent travel to countries where *C. cayetanensis* is endemic have not been ruled out as the sources of the pathogen in these outbreaks. Since 2016, the number of cyclosporiasis cases has increased approximately 3-fold, often linked to the consumption of leafy herbs and ready-to-eat salads. Fecal contamination from symptomatic or asymptomatic carriers is, ultimately, the only known source of *C. cayetanensis*. A hypothesis that *C. cayetanensis* has become endemic in the production regions of the U.S. remains to be robustly supported, therefore in the meanwhile, farm workers with a history of recent travel to areas where the parasite is common are the likeliest source of the pathogen. *C. cayetanensis* likely spreads via the fecal-environment-oral route when sanitation controls break down. Efforts have been made to develop molecular detection methods for *C. cayetanensis* in both food vehicles and environmental water. However, due to the high degree of synteny between *C. cayetanensis* and its close relatives that are not pathogenic in humans, results of some environmental surveys that relied solely on the PCR-based detection of ribosomal RNA genes have been called into question. There remain significant knowledge and data gaps that hamper the implementation of effective measures to prevent the contamination of produce with the oocysts

72 of this parasite. Awareness of the factors that can contribute to *C. cayetanensis* contamination  
73 of domestically grown and imported produce is key to developing an effective prevention and  
74 management strategy.

75  
76  
77 **RECOMMENDATIONS:**

- 78
- 79 1. To facilitate future research (e.g., validation of surrogates, studies on environmental  
80 persistence and attachment) and identification and validation of control strategies, the  
81 Committee urges development of a practical method to propagate *C. cayetanensis*  
82 oocysts under laboratory settings.  
83
  - 84 2. Because of the limited availability of *C. cayetanensis* oocysts, research with surrogates –  
85 and specifically with the close relative *Eimeria* – can be informative for identifying control  
86 strategies and learning about persistence in the production environment.  
87
  - 88 3. Method development for the detection of *C. cayetanensis* in food and environmental  
89 samples should include the evaluation of multiple genetic targets representing different  
90 regions of the genome. Modifications to current molecular methods for the detection of  
91 *C. cayetanensis* should be thoroughly validated for impacts on specificity before using  
92 modified methods on food or environmental samples. Conversely, detection methods  
93 should be designed to be robust, reproducible and tolerant of minor modifications in the  
94 methodologies (e.g., brand of equipment or reagents, minor deviations in PCR  
95 conditions, etc.) without sacrificing specificity.  
96
  - 97 4. Given the likeliest source of the parasite in the food production environment (workers  
98 with a history of recent travel to areas where infections with *C. cayetanensis* are  
99 common), preventative measures should center around clear sanitation guidelines,  
100 ensuring on-site capacity for implementing sanitation protocols (i.e., readily accessible  
101 hand washing stations with soap, etc.) and periodic training of the employees.  
102

103  
104  
105 **Charge from FDA to NACMCF**

106  
107 **Background**

108 *Cyclospora* spp. are protozoan parasites in the phylum Apicomplexan that can parasitize  
109 different species of mammals with remarkable host-specificity. *Cyclospora* has a complex life  
110 cycle and can only multiply within the infected hosts. Among the *Cyclospora* species,  
111 only *Cyclospora cayetanensis* is known to infect humans; all other species are associated with  
112 infections in other animals. This parasite is characterized by environmentally-hardy oocysts that  
113 are shed in stool by the infected persons. These oocysts are shed unsporulated and are not  
114 infectious. Once released into the environment, unsporulated oocysts require approximately 7 to  
115 14 days under certain environmental conditions to sporulate and become infectious. The

116 oocysts are thought to be transferred to the surface of foods through environmental routes (e.g.,  
117 through human fecal pollution carried by agricultural water) subsequently infect the host after  
118 produce is consumed. Once consumed, the sporulated oocysts replicate in the human  
119 gastrointestinal tract and continue the infection cycle as unsporulated oocysts are shed in  
120 stool. The cycle continues as human fecal pollution again contaminates the environment. A  
121 limitation to widespread *Cyclospora cayetanensis* research is the inability to directly culture or  
122 propagate the organism. Researchers rely solely on acquired oocysts to conduct research.  
123 Some work has been done to use surrogate organisms to mimic the life cycle of *Cyclospora*  
124 *cayetanensis*, however with limited positive results.

125  
126 A positive *C. cayetanensis* finding is indicative of the presence of human fecal contamination, as  
127 humans are the only known reservoir. Cyclosporiasis is characterized by symptoms such as  
128 explosive diarrhea, vomiting, fatigue, and weight loss. *C. cayetanensis* has become a major  
129 public health and food safety concern during the last few years. Outbreaks of cyclosporiasis  
130 affect thousands of individuals in the U.S. annually, with a steady increase in reported cases  
131 over recent years. In 2020, CDC reported 1,241 laboratory-confirmed cases of cyclosporiasis in  
132 people who had no history of international travel. In 2019 and 2018, there were 2,408 and 2,299  
133 cases reported each year, respectively. Comparatively, between 2000–2017, the total number  
134 of cases reported for cyclosporiasis in the US was 1,730. Additionally, cyclosporiasis typically  
135 results in symptomatic illness in the general population regardless of age in the US, whereas in  
136 endemic areas, young children and immunocompromised individuals are most at risk for severe  
137 illness. Outbreaks of cyclosporiasis generally occur during the warmer months of May –  
138 September for the northern hemisphere, and November – March for the southern  
139 hemisphere. Historically, these outbreaks have been linked to ingestion of contaminated  
140 berries, fresh cilantro, basil and, more recently, ready-to-eat bagged salads.

141  
142 Several efforts have been implemented to develop molecular detection methods for *C.*  
143 *cayetanensis* in both food vehicles and environmental water. These methods have been used  
144 to assist epidemiological investigations and surveys to estimate the prevalence of *C.*  
145 *cayetanensis* in commodities and growing regions. Despite these scientific efforts, there are still  
146 several significant knowledge and data gaps that hamper the implementation of effective  
147 measures to prevent the contamination of produce with the oocysts of this parasite.

148  
149 **Charge Questions:**

150  
151 **FDA is seeking information on the factors that can contribute to *C. cayetanensis***  
152 **contamination of domestically grown and imported produce, and recommendations for**  
153 **developing an effective prevention and management strategy.**

- 154  
155 1. What is known about the prevalence, incidence, and burden of disease of cyclosporiasis  
156 in the U.S. and internationally?  
157 a) Are there specific segments of the U.S. population that may be at higher risk for  
158 infection? What is the geographic distribution of cases in the U.S.?

- 159 b) What is the diversity of *Cyclospora cayetanensis* genotypes in the US and  
160 internationally?
- 161 c) What factors (e.g., food safety practices, location of the farms) may contribute to  
162 contamination with *Cyclospora cayetanensis*?
- 163 d) Are certain factors (e.g., type of food, seasonality, where the food is produced,  
164 degree of hand contact during growing and harvesting) more significant than others?  
165
- 166 2. How does the seasonality, incidence and prevalence of cyclosporiasis compare  
167 throughout the United States and internationally and what factors may contribute?  
168 a) Extrinsic factors that may influence sporulation and survival (e.g., extrinsic factors  
169 influencing sporulation and survival);  
170 b) Environmental factors influencing movement (e.g., rainfall);  
171 c) Other?  
172
- 173 3. What sampling data exists for *Cyclospora cayetanensis* in food products and  
174 environmental samples, domestically and internationally?  
175 a) What trends have been observed?  
176 b) What methods of detection were used?  
177
- 178 4. What types of foods have been attributed to outbreaks of cyclosporiasis domestically  
179 and internationally and what (if any) contributing factors, sources or routes of  
180 contamination that have been identified?  
181
- 182 5. Is monitoring for *Cyclospora cayetanensis* by testing food products, agricultural  
183 environment and agricultural inputs being applied as a management strategy currently  
184 (e.g., by industry, government)?  
185 a) Are there best practices for monitoring for the presence of *Cyclospora cayetanensis*  
186 in agricultural production (including matrices [e.g., water, product], frequency, timing  
187 of sample collection (pre- vs. post-harvest), and sample numbers)?  
188 b) Has monitoring led to development and implementation of effective preventive  
189 measures? If so, how effective have they been?  
190
- 191 6. What are available approaches for characterizing the relatedness of different strains of  
192 *Cyclospora cayetanensis* (e.g., subtyping)?  
193
- 194 7. What are currently available test methods (and comparative sensitivity/specificity) for  
195 detecting and/or isolating *Cyclospora cayetanensis* in different matrices (e.g., food,  
196 water, environmental samples)? What type of validation has the method(s) undergone?  
197 What are the matrices for which the methods have been validated?  
198
- 199 8. What information exists on assessing viability of oocysts?  
200
- 201 9. What preventive measures exist for the control of *Cyclospora cayetanensis* (e.g., using  
202 filtration)?

- 203 a) How effective have they been?  
204 b) What are the impediments to development of effective preventive measures for  
205 *Cyclospora cayetanensis* and how can they be overcome?  
206
- 207 10. What is known about *Cyclospora cayetanensis* persistence/survival in food, such as  
208 produce, and the environment (e.g., soil, water, food contact surfaces)?  
209
- 210 11. What is known about transfer and attachment of *Cyclospora cayetanensis* from  
211 environmental samples (water and soil) to produce?  
212
- 213 12. What other coccidian parasites could serve as a surrogate research model for  
214 *Cyclospora cayetanensis* behavior (e.g., for evaluation of control measures)?  
215
- 216 13. Are there indicator organisms that can be used to determine the likely presence or  
217 absence of *Cyclospora cayetanensis* in various matrices?  
218
- 219 14. What is known about the role of vectors (such as non-human organisms), if any, in the  
220 transmission of *Cyclospora cayetanensis*?  
221
- 222 15. What role do farm workers play in the transfer of *Cyclospora cayetanensis* contamination  
223 during pre-harvest, harvest and post-harvest handling? Are there particular approaches  
224 that would result in selective identification of the serotypes of public health concern?  
225 a) How might farm workers serve as both sources and routes of contamination (such as  
226 through contamination of agricultural water, or transfer of contaminated soil to food  
227 contact surfaces or produce)?  
228 b) What are strategies that have been utilized to mitigate the contamination from farm  
229 workers? Have efforts to mitigate contamination from farm workers been successful?
- 230 16. Are there practices for the maintenance and conveyance of wastewater, septage or  
231 human waste that may increase the incidence of *Cyclospora cayetanensis*  
232 contamination? Are there practices that may be useful in the management of waste to  
233 reduce the potential for contamination by *Cyclospora cayetanensis* (e.g., third-party toilet  
234 service or municipal wastewater treatment)?  
235 a) Which wastewater, septage, and human waste treatments in the U.S. are effective  
236 against *Cyclospora cayetanensis*? Which treatments may not be effective against  
237 *Cyclospora cayetanensis*?  
238 b) Does municipal water treatment adequately reduce, control or eliminate *Cyclospora*  
239 *cayetanensis*?  
240 c) Can effective municipal water treatments systems be scaled to treat agricultural  
241 water used in produce production?  
242 d) How do practices compare for domestic growers versus international growers who  
243 export to the U.S.?
- 244 17. What elements or points in the parasite's life cycle are potential targets of strategies to  
245 disrupt its progression, eliminate or destroy oocysts, stop dissemination into the  
246 environment, and prevent food contamination?

247 a) What are control measures that should be evaluated for effectiveness against  
248 *Cyclospora cayetanensis*? Including control measures that can be applied to the  
249 environment and/or foods that may be consumed in the raw form.

250 b) What is a recommended protocol for evaluating the effectiveness of control  
251 measures against *Cyclospora cayetanensis*?

252

253 18. What are the relevant factors, available data, and data gaps needed to develop an  
254 informative quantitative risk assessment model for *Cyclospora cayetanensis*  
255 contamination and risk of illness?

256

## 257 **COMMITTEE RESPONSES**

### 258 **Approach by the committee:**

259 A number of comprehensive reviews of peer-reviewed literature on *Cyclospora* have been  
260 published recently and consulted by this committee (e.g., REFs). However, in this rapidly  
261 evolving field, a reliance on only peer-reviewed publications was deemed limiting by this  
262 Committee. Therefore, in addition to the peer-reviewed studies accessible via PubMed, the  
263 committee consulted scientific reports (such as those found in the databases of completed or  
264 ongoing research projects found in the USDA CRIS database and in the database maintained  
265 by the Center for Produce Safety), the Committee accessed documents released by federal  
266 agencies into the public domain and heard semi-structured testimonies from academic, federal  
267 and industry researchers working on *C. cayetanensis* and other parasites. Results of these  
268 findings are presented in this report.

269

270 The committee notes an on-going conversation about nomenclature of *Cyclospora* and a  
271 proposal to separate *C. cayetanensis* into 3 species (with the addition of *Cyclospora ashfordi*  
272 sp. nov. and *Cyclospora henanensis* sp. nov.). All three of these species are parasitic to  
273 humans (Barratt et al. 2023 same as: <https://pubmed.ncbi.nlm.nih.gov/36560856/>). However,  
274 because all prior research functionally defined *C. cayetanensis* as the only member of the  
275 genus responsible for the human cyclosporiasis, and all prior publications referred to this  
276 parasite as "*Cyclospora cayetanensis*" or "*C. cayetanensis*" the rest of this report will continue to  
277 refer to these organisms as "*Cyclospora cayetanensis*" or "*C. cayetanensis*".

278

279 Finally, the committee notes recent studies from academic and federal laboratories that  
280 demonstrated striking limitations of the detection of *C. cayetanensis* relying solely on the PCR  
281 primers designed to amplify 18S regions of the organisms rRNA genes. When environmental  
282 isolates amplified with these primers were sequenced, the majority of them (>90%) revealed  
283 amplification of closely related *Eimeria* spp. parasitic in various animals, but not humans.  
284 Therefore, throughout this report, when discussing environmental and food samples (and unless  
285 a secondary positive identification step was performed), this report discusses the detection of  
286 amplicons in a PCR reaction, not the presence of *C. cayetanensis* nor a presumptive presence  
287 of the parasite, regardless of the conclusions drawn by the authors of the original publications at  
288 the time of the original publication.

289

290 The committee organized the charge questions into 5 groups: (1) Sources and Routes (Q4,  
291 Q11, Q14 and Q15); (2) Prevalence/Persistence and indicators (Q1, Q2, Q10 and Q13); (3)  
292 Analytical Methods (Q3, Q6, Q7 and Q8); (4) Control Strategies and surrogates (Q5, Q9, Q12,  
293 Q15b, Q16 and Q17); and (5) Relevant Factors & Data Gaps (Q18).

294  
295

296  
297

## Sources and Routes

### 298 **Q4: Foods associated with outbreaks**

299 **What types of foods have been attributed to outbreaks of cyclosporiasis domestically**  
300 **and internationally and what (if any) contributing factors, sources or routes of**  
301 **contamination that have been identified?**

302 Cyclosporiasis outbreaks have been linked to fresh fruits and vegetables, and foods containing  
303 them. From a total of 70 outbreaks reported globally, 55 were caused by fresh produce. The  
304 fruits and vegetables most frequently related to *Cyclospora* infections were: raspberries (34%),  
305 basil (31%), cilantro (10%) and salad mixes (10%). Sugar snap peas, lettuce, blueberries,  
306 blackberries, carrots, mangos, mint, scallions, mixed vegetable trays, and fruit salads were also  
307 associated with cyclosporiasis outbreaks (in some investigations, a single food vehicle was not  
308 identified.) During the summer months cyclosporiasis increases in both endemic and non-  
309 endemic regions. Research is needed to identify factors that influence the transmission of the  
310 parasite to fresh fruits and vegetables.

311

312 According to estimates from the CDC from 2011, the number of infections transmitted via food  
313 contaminated with *C. cayetanensis* per year is >11,000, which result in ~11 hospitalizations  
314 each year (Scallan et al. 2011). The incidence determined by FoodNet has increased markedly  
315 in the last five years with as many as 1.51 cases per 100,000 in 2019 (CDC, 2023 Pathogen  
316 Surveillance, FoodNet). In contrast, from 2006 to 2016 this incidence ranged from 0.03 to 0.09.  
317 In the US, the first cyclosporiasis outbreak happened in hospital workers in Illinois in 1990,  
318 which the authors attributed to the tap water in a storage tank that may have experienced a  
319 pump failure (Huang et al. 1995). While this report is often cited as the first case of domestically  
320 acquired cyclosporiasis, it is important to note that the diagnosis was based solely on a  
321 microscopic observation of spherical bodies 8-11 um in diameter, and neither the methodology  
322 nor key epidemiological data linking the outbreak to the water tank were reported. Further, in  
323 light of the currently prevailing hypothesis of the route of transmission, questions about the  
324 eventual source of the parasite in the tank of presumably chlorinated city tap water also remain  
325 unanswered.

326

327 Most studies indicate that the fecal--oral route via transmission through contaminated water  
328 and/or food is most likely for *C. cayetanensis* (1). The direct fecal-oral transmission is less likely  
329 given the observation that fecally shed oocysts (which are themselves not known to be  
330 infectious) need to sporulate into infectious spores in response to a yet unknown environmental  
331 or chemical cue. Therefore, the route of transmission is more accurately described as "fecal-  
332 environment-oral". In the absence of known vertebrate or invertebrate vector (see discussion  
333 on vectors below), the only reasonable routes of transfer involve fecally-contaminated

334 agricultural water or fecally contaminated deposits on or in direct vicinity of the harvested  
335 product.

336  
337 Multiple studies have been conducted by FDA, academic researchers and the industry to  
338 determine presence of *C. cayetanensis* in various water sources; these studies included  
339 samples from irrigation water, contaminated crop protectant sprays, or contaminated wash  
340 waters (Almeria et al. 2019). Almeria and coworkers summarized 20 different studies from  
341 several countries in which amplicons resulting from a PCR reaction using primers to detect *C.*  
342 *cayetanensis* or presumptive *Cyclospora* in water were reported. Thirteen of those studies used  
343 microscopy and seven reported a PCR method for detection of *C. cayetanensis*. However,  
344 even when DNA amplifiable with the *C. cayetanensis* ribosomal RNA PCR primers was  
345 detected in the irrigation canals, no conclusive evidence linking presumptive positives with an  
346 on-going outbreak was established. Finally and importantly, it should be noted that the primers  
347 developed to amplify fragments of *C. cayetanensis* 18S rDNA and often used in environmental  
348 surveys have a very high degree of cross-reactivity with orthologous genes from closely related  
349 *Eimeria* spp. that are not pathogenic to humans, which resulted in the vast majority (>90%) of  
350 PCR-positive environmental samples having been confirmed as belonging to various *Eimeria*  
351 spp. by sequencing.

352  
353 Most recorded *Cyclospora* foodborne outbreaks have been linked to the consumption of fresh  
354 fruits and vegetables (Almeria, Cinar and Dubey 2019, Hadjilouka and Tsaltas 2020). The first  
355 documented case of transmission via a food product was reported in 1995 when raspberries  
356 imported from Guatemala were linked to 45 cases in the U.S. (Herwaldt 2000). It was not  
357 determined if the contamination came from direct human contact (e.g., worker hands), animals,  
358 or indirect human contact through contaminated water from poorly constructed or maintained  
359 wells, or from run off during the rainy season. Insecticides or fungicides mixed with  
360 contaminated water were also suspected. However, during the testing period, no positive  
361 results for *C. cayetanensis* were obtained from any of the environmental samples (Herwaldt and  
362 Ackers 1997). Prior to the first raspberries outbreak, water had been the only known vehicle for  
363 transmission of the parasite and to this date no food category other than fresh or fresh-cut  
364 produce has been associated with this parasite (Almeria 2019, Almeria et al. 2019).

365  
366 From 1990 to 2021, more than 55 outbreaks have been reported in the U.S. (Almeria et al.  
367 2019). In the last decade, five outbreaks were caused by fresh produce imported from Mexico,  
368 including three events due to contaminated cilantro (CDC 2018c; CDC 2020; CDC 2021). More  
369 than 70 outbreaks in different parts of the world have been reported since 1989, and from those,  
370 55 have been suspected or confirmed to be linked to fresh produce (Almeria et al. 2019) and  
371 Table 1). From those outbreaks in which the vehicle was identified between 1995 to 2019, basil  
372 consumption was reported in 34% of outbreaks and raspberries were the vehicle in 31% of  
373 events (Hadjilouka and Tsaltas 2020). Cilantro was the third individual fresh produce commodity  
374 most frequently associated with cyclosporiasis outbreaks, and different salad mixes caused  
375 eight outbreaks (Almeria et al. 2019a) (Almeria 2019, Almeria et al. 2019). Other fruits and  
376 vegetables reported to be linked to *C. cayetanensis* transmission include snow snap peas,  
377 blackberries, blueberries, salad mixes, fruit mixes, scallions, carrots, and mangos.

379 Table 1. Most common food attribution of recorded *C. cayetanensis* outbreaks.

Food vehicle	No. of outbreaks (confirmed and suspected)	Years	Countries where the cases were reported	Size of outbreaks (No. cases)
Raspberries	12	1995, 1996, 1997, 1998, 2001, 2009	Canada, USA, Spain,	13 -1,465
Basil	11	1997, 1999, 2001, 2004, 2005, 2006, 2007, 2010, 2018, 2019	Canada, USA,	28 - 582
Salad mixes (including vegetable trays and coleslaw)	8	1997, 2000, 2001, 2013, 2016, 2018, 2020, 2021	Canada, Germany, Mexico, USA,	25 - 711
Cilantro	6	2003, 2004, 2013, 2014, 2015, 2018	Canada, USA	8 - 546
Berry/fruit mixes	6	1997, 1998, 1999, 2009, 2019	Canada, USA	8 – 104
Lettuce	2	2010, 2014,	Australia, USA,	227, 266
Snap peas	2	2008, 2009	Sweden, USA	4, 18

380

381 (Almeria et al. 2019a; CDC, 2020; CDC, 2021)

382 The first year when *Cyclospora* infections were suspected to have a domestic origin in the U.S.  
383 was in 1997, when 185 cases were reported after attending an event and consumed  
384 contaminated basil (CDC 1997). In 2001, 17 cases of cyclosporiasis were reported in British  
385 Columbia, Canada. The investigation found that 11 of 12 (92%) cases had consumed Thai  
386 basil, which had been imported from the U.S. (Ortega and Sanchez 2010). In 2017, from more  
387 than 1,060 cases of laboratory-confirmed cyclosporiasis (CDC 2017), 597 of those patients  
388 reported no international travel. In 2018, several outbreaks were recorded (CDC 2018a)(CDC  
389 2018b) including an event associated with pre-packaged mixed vegetable (broccoli, cauliflower,  
390 carrots, and dill dip) trays. While the specific vehicle of transmission was not identified, these  
391 produce items appeared to have been grown domestically. The second major outbreak in 2018  
392 with domestically produced vegetables involved 511 laboratory-confirmed cases in 15 states,  
393 caused by romaine lettuce and carrot salads served at a fast-food chain and produced by a  
394 fresh cut processor company (CDC 2018b).

395

396 In addition to those two outbreaks, there were clusters of cases linked to cilantro and basil  
397 reportedly grown in the U.S. In 2019, from 2,409 cyclosporiasis cases distributed among  
398 multiple restaurant and event clusters, only 10% of the patients were linked to consumption of  
399 fresh basil imported from Mexico (CDC 2019). In 2020, another multi-state outbreak that

400 involved 701 cases was caused by salad mixes containing iceberg lettuce, carrots, and red  
401 cabbage, distributed by the same fresh produce company from 2018 (CDC 2020). In 2021,  
402 1,020 confirmed cases were reported with no history of international travel, including two  
403 outbreaks of 40 and 130 illnesses, respectively, in which the patients reported consuming  
404 different leafy greens (CDC 2021).

405  
406 Pasteurized foods or foods thoroughly heated before consumption have not been associated  
407 with cyclosporiasis in the U.S. From the 154 outbreaks listed in the National Outbreak Reporting  
408 System (NORS) from 1971 to 2021, none of them lists food that was subjected to processing  
409 other than cutting and bagging. (CDC, 2023). Shellfish have been proposed to concentrate  
410 oocysts from contaminated waters. Controlled laboratory studies with fresh-water clams  
411 (*Corbicula fluminea*) showed that 48 to 100% of the clams retained *Cyclospora* oocysts for up to  
412 13 days (Graczyk et al. 1998). In surveys of natural exposure of invertebrates to *C.*  
413 *cayetanensis*, filter feeder shellfish such as mussels and clams were found to be positive for  
414 oocysts of *C. cayetanensis*(Aksoy et al. 2014, Ghozzi et al. 2017). Although, the review  
415 authors concluded that shellfish were unlikely to be significant to the epidemiology of  
416 cyclosporiasis because the mollusks did not travel large distances, it was noted that sampling  
417 shellfish for *C. cayetanensis* oocytes may be more efficient than sampling large volumes of  
418 water (Totton et al. 2021).

419

#### 420 **Factors, sources, or routes of contamination**

421 For this report, we distinguish associations with environmental conditions between  
422 countries/regions where *C. cayetanensis* is endemic (and transmission is via fecal-  
423 environmental-oral route) versus those where cases of cyclosporiasis are linked to exotic  
424 introductions (via travel, or interactions with imported product).

425

426 Seasonality has been identified as one of the factors affecting the incidence of *Cyclospora*  
427 infections in the areas where *C. cayetanensis* is endemic (Li et al. 2020). In most countries,  
428 especially in the Northern hemisphere, during the summer months the cases increase markedly,  
429 but other climate factors such as rainfall seem to differ in some regions of the world (Almeria et  
430 al. 2019). The seasonality of traditionally non-endemic countries, such as the U.S., has  
431 resembled seasonal patterns of endemic countries from which produce is exported or those of  
432 popular travel destination, such as Mexico. Increased incidence between May to September has  
433 continued in the U.S. in the last four years in domestically acquired outbreak cases (CDC  
434 2018a, CDC 2021). This coincidence in the seasonality of the presumptive domestically  
435 acquired cyclosporiasis cases is curious, but it is unclear whether it coincides or correlates with  
436 increased summer travel, migration of seasonal labor force, import of certain commodities to  
437 supplement domestic production during “shoulder seasons” or some other factor not yet  
438 accounted for. Intriguingly, a study by Barratt et al. (2022) suggests that distinct genotypes (or  
439 species) of *Cyclospora* are responsible for partially overlapping seasonally occurring outbreaks  
440 of cyclosporiasis.

441

442 In countries where cyclosporiasis is endemic, consumption of contaminated water has been  
443 consistently identified as the most important risk factor for infections (Almeria et al. 2019a).

444 Studies in Venezuela and Nepal have also reported a relationship between exposure to soil  
445 contaminated with human feces, exposure to livestock, and consumption of fruits and  
446 vegetables (Bhandari et al. 2015, Chacín-Bonilla 2008). Bhandari et al. (2015) is the only report  
447 that found a group of patients in which the OR was significant for exposure to livestock. This  
448 observation seemingly contradicts the prevailing hypothesis of the host range for *C.*  
449 *cayetanensis* and may mask an underlying livestock management practice where exposure to  
450 *C. cayetanensis* is likely. In the U.S., the majority of cases used to be linked to ingestion of  
451 imported fresh produce or to international travel, but in recent years the proportion of cases that  
452 do not have an identified connection with international origin is increasing (CDC 2018a, CDC  
453 2019, CDC 2021).

454  
455 Since 2018, as the implicated crops have been predominantly grown in the U.S., leafy greens  
456 have emerged as one of the most common vehicles, as compared to earlier years when  
457 imported produce was more frequently associated with outbreaks (CDC 2018C). Despite the  
458 periodic seasonal, occurrence of outbreaks every year, the means by which fresh produce  
459 becomes contaminated have not been elucidated. The possibility that infected field laborers  
460 were the source of food contamination has not been ruled out, nor was the parasite isolated  
461 from the crop production environment or irrigation water on farms supplying the produce  
462 implicated in outbreaks. In one of the few cases of traceback investigation on implicated farms,  
463 the FDA detected signals using primers designed for the amplification of the *C. cayetanensis* 18S  
464 ribosomal rRNA genes in a sample from a water management canal that may have supplied  
465 irrigation water to one of the farms in Florida (FDA 2020). The PCR method used at that time  
466 was an FDA-validated method, but the investigators were not able to genetically match the  
467 amplicons from the environmental isolations with clinical cases. For advancing knowledge of  
468 sources and routes of contamination, it is essential that fully validated detection protocols are  
469 applied in future prevalence and incidence studies.

470

#### 471 **Q11: Transfer and attachment**

#### 472 **What is known about transfer and attachment of *C. cayetanensis* from environmental** 473 **samples (water and soil) to produce?**

474 A literature survey was completed on the detection, epidemiology and control of *C.*  
475 *cayetanensis* on produce, water and soil. The review indicated that out of 38 studies, 13 were  
476 conducted on produce, 24 were conducted on water and only one study was conducted on a  
477 soil sample. (TOTTON; O'CONNOR; NAGANATHAN; MARTINEZ *et al.*, 2021). The CDC has  
478 conducted multiple epidemiology studies during or after an outbreak period and have yet to  
479 conclusively determine if transfer is primarily from direct contact of contaminated surfaces or  
480 worker's hands or indirect contact from food contact surfaces or water sources such as irrigation  
481 water, protective sprays or wash water. The lack of conclusive results about source transfer  
482 represents a major knowledge gap and more studies are needed to better understand  
483 whether/how *C. cayetanensis* oocysts are transferred from water and/or soil to produce. The  
484 attachment of *C. cayetanensis* to plant surfaces is not fully understood but it may be enhanced  
485 by the physical structure of the plants and surface adhesive structures produced by the  
486 parasite (Tefera et al. 2018). The physical attachment of better studied parasites to non-host

487 surfaces may offer models that shed light on attachment and transfer of *Cyclospora* to/from  
488 plants.

489  
490 *Cyclospora* oocysts are considered comparatively more “sticky” than *Cryptosporidium* oocysts,  
491 due to specific adhesins (proteins present on the surface of bacteria or fungi that help attach to  
492 biotic or abiotic surfaces). (Tefera et al. 2018). *Cyclospora*, *Toxoplasma*, *Eimeria* and other  
493 parasites in the Apicomplexa phylum use adhesins to promote recognition, attachment, and  
494 invasion of the host cells. The parasite could produce modified versions of the naturally  
495 occurring surface glycans in plants to increase affinity and specificity. It is suggested that  
496 susceptibility is partially determined by the surface molecules on the parasite and host that act  
497 in a concerted receptor-ligand manner (Boulanger MJ et al, 2010).

498 In Chandra, et al 2014, oocysts were dislodged with water from basil leaves, but were more  
499 efficiently recovered using acidified water or surfactant. This result may suggest that some  
500 parasite surface structures were involved in the covalent or physical attachment to plant  
501 surfaces. Given that little is known about *Cyclospora* attachment, a potential opportunity is to  
502 conduct a comparative analysis with *Eimeria* and what is known about attachment of *Eimeria* to  
503 animal cells. *Eimeria* attachment mechanism has been extensively studied, but attachment to  
504 animal cells almost certainly involves different mechanisms than attaching to plant cells (Fuller  
505 and McDougald, 2002). This is an opportunity for further research to determine whether this is  
506 an example of a mechanism used to attach to both plant and animal hosts. However, given the  
507 currently limited availability of *C. cayetanensis* oocysts, these studies may need to be de-  
508 prioritized.

509  
510 **Q14: The role of vectors**

511 **What is known about the role of vectors (such as non-human organisms), if any, in the**  
512 **transmission of *C. cayetanensis*?**

513 *C. cayetanensis* is known to infect only humans, and humans are the only known naturally  
514 occurring host for *C. cayetanensis*. However, the involvement of animals could not be  
515 discounted in the epidemiology of cyclosporiasis associated with fresh produce. Exposure to  
516 domestic animals/livestock has been implicated as a risk factor for cyclosporiasis. Living closely  
517 with birds, guinea pigs, rabbits (Bern et al. 2002), poultry (el-Karamany, Zaher and el-  
518 Bahnasawy 2005), and cattle (Bhandari et al. 2015) were found to be a possible hygienic factor  
519 associated in elevated incidence of cyclosporiasis. From the set-up of these correlative studies,  
520 it is unclear whether it is interactions with the livestock per se that increased the risk, or whether  
521 there were hygiene practices masked by the structure of the observations.

522  
523 When *C. cayetanensis* was first recognized as an infective agent in human outbreaks, surveys  
524 were conducted in an attempt to determine whether there was a zoonotic source of the parasite.  
525 Garcia-Lopez et al, (García-López, Rodríguez-Tovar and Medina-De la Garza 1996) found what  
526 was assumed to be *C. cayetanensis* oocysts in fecal samples pooled from 600 4–6 week old  
527 chickens and a second pooled fecal sample of 50 6-8 week old chickens. The identification was  
528 based on oocyst morphology, positive acid-fast staining, positive autofluorescence under UV  
529 light and sporulation after 10 days of incubation. The authors hypothesized that it could have  
530 been a related organism, and – in retrospect – this was the likeliest conclusion, with the

531 researchers having almost certainly had observed a closely related *Eimeria* spp., a common  
532 poultry parasite.

533  
534 Yai et al,(Yai et al. 1997) reported on two cases of dogs with unexplained diarrhea that yielded  
535 characteristic *Cyclospora* oocysts using light microscopy. The authors suggested that this  
536 contact with dogs may be important in human cyclosporiasis. Zhao et al, 2021 provided a  
537 literature review of animal surveys for *Cyclospora*-like organisms in a variety of animals  
538 including dogs, birds, cattle, insects, poultry, non-human-primates, rodents, sheep/goats, and  
539 shellfish. A variety of methods were used in these studies to identify *Cyclospora*-like organisms  
540 ranging from light microscopy with staining to distinct types of PCR. Although *Cyclospora*-like  
541 oocysts were observed microscopically or samples were positive using PCR in these studies,  
542 infection of any animal by *C. cayetanensis* was not confirmed.

543  
544 A wide range of primates, reptiles, rodents and insects may serve as hosts to 19 different  
545 species of *Cyclospora* (Onstad et al. 2019, Giangaspero and Gasser 2019). Incidents have  
546 been reported of *Cyclospora* found outside of the primary host organism such as in shellfish and  
547 non-host primates in the wild and captivity, although infections of the non-host organisms were  
548 not demonstrated (Graczyk, Ortega and Conn 1998, Li et al. 2015, Marangi et al. 2015, Chu et  
549 al. 2004). Eberhard et al, identified three different *Cyclospora* species from oocytes in baboon  
550 and monkey stool samples. However, sporulated oocytes could not be identified due to the  
551 preservation process (Eberhard et al. 1999). Marangi and colleagues used primers targeted to a  
552 116 bp region within *Cyclospora*'s ITS-2 gene. Infection of these animals by *C. cayetanensis*  
553 was not confirmed by biopsy of the small intestine or it was not performed in any of these  
554 studies (Totton et al. 2021). Several experimental studies attempted to infect other animal  
555 species with *C. cayetanensis*. The results of those experiments suggested that after 4-6 weeks  
556 of infection, there were no signs of infection indicating that any of the animals tested were  
557 susceptible to infection with *C. cayetanensis* (Eberhard et al. 2000). In reviewing surveys of  
558 natural exposure of vertebrates to *C. cayetanensis*, no publications were found that examined  
559 fish, reptiles or amphibians' exposure to *C. cayetanensis* oocysts. (Totton et al. 2021)  
560 The hypothesis that *C. cayetanensis* is transmitted by coprophagous animals (as paratenic or  
561 transient hosts) was tested using a soil nematode model. Huamanchay et al. (Huamanchay et  
562 al. 2004) reported that while a soil nematode *Caenorhabditis elegans* was able to ingest  
563 *Cryptosporidium parvum* oocysts, oocysts of *C. cayetanensis* were not ingested by the  
564 nematode. The authors hypothesized that the observed difference was due to the much larger  
565 size of the *Cyclospora* oocysts. Despite this outcome, the authors noted that there was  
566 possibility that other nematodes may be able to ingest *C. cayetanensis* oocysts and that the role  
567 of other free-living nematodes in the mechanical transport of *C. cayetanensis* oocysts from the  
568 soil to fresh product needs to be investigated. The fact that coprophagous animals present in  
569 crop production environment (dogs, coyotes and some birds) are also a host to their own host-  
570 adapted close relatives of *C. cayetanensis* complicates interpretation of the surveys given  
571 difficulties in interpreting PCR and microscopy data without a confirmatory sequencing step.  
572  
573 Totton et al, (Totton et al. 2021) reviewed the role of animal vectors in the epidemiology of  
574 cyclosporiasis. In the review of natural or experimental studies of infection of animals by *C.*

575 *cayetanensis*, the authors included only studies that were specific to *C. cayetanensis* and used  
576 PCR in non-laboratory studies to identify DNA consistent with *C. cayetanensis*. They used this  
577 method of selecting studies to be included in the review because a variety of *Cyclospora*  
578 species infect animals and identification by microscopy is not sufficient to accurately identify *C.*  
579 *cayetanensis*. The authors also recommended that future studies use PCR coupled with DNA  
580 sequencing to confirm *C. cayetanensis* because PCR primers may cross-react with other  
581 protozoa leading to misidentification. Solarczyk (2021) also reviewed the zoonotic implications  
582 of *Cyclospora* and recommended using morphometric analysis along with sporulation analysis  
583 as a primary method in zoonotic surveys. These reports clearly stress the importance of primer  
584 design and specificity for *C. cayetanensis* to minimize false positives. Since insects such as  
585 houseflies are attracted to human feces, insects could be an area for future research (Totton et  
586 al. 2021).

587

### 588 **Q15: The role of farm workers**

589 **What role do farm workers play in the transfer of *C. cayetanensis* contamination during**  
590 **pre-harvest, harvest and post-harvest handling? Are there particular approaches that**  
591 **would result in selective identification of the serotypes of public health concern?**

592 a) **How might farm workers serve as both sources and routes of contamination (such**  
593 **as through contamination of agricultural water, or transfer of contaminated soil to**  
594 **food contact surfaces or produce)?**

595 b) **What are strategies that have been utilized to mitigate the contamination from**  
596 **farm workers? Have efforts to mitigate contamination from farm workers been**  
597 **successful?**

598 Hygienic practices of farm workers are a key focus area for prevention of the transmission of  
599 cyclosporiasis. Farm workers may be temporary seasonal workers hired for weeding, irrigation,  
600 harvesting and packing of fresh produce items in many agricultural regions of the United States.  
601 These farm workers may have been asymptomatic during the harvest period. Therefore, it is  
602 critical that farmworkers are well trained in appropriate hygienic practices, that necessary  
603 equipment is available including well-managed toilet facilities, gloves and aprons, and that there  
604 is an awareness of nearby sources of potential human fecal contamination into farm water  
605 sources.

606

607 Because *C. cayetanensis* is a host-limited parasite, human fecal contamination is the only  
608 ultimate source of oocysts in the production and processing environment. In the areas where *C.*  
609 *cayetanensis* is endemic, oocysts are likely common in agricultural water. In most crop  
610 production environments of the United States, feces of laborers who are symptomatic or  
611 asymptomatic carriers of *C. cayetanensis* are likely sources of the oocysts in the production or  
612 processing environment.

613

614 In 2012-2015 between April 1 and August 31, the CDC and State Health Departments identified  
615 multiple outbreaks traced to cilantro harvested from farms in Puebla, Mexico. Since none of the  
616 outbreaks were confined to a single farm, pack date, ship date and/or lot code, the FDA  
617 concluded that the contamination was from a larger source (Abanyie et al. 2015). Suggested  
618 sources of the parasite included fecal contamination of growing areas, irrigation of fields with

619 water contaminated with sewage, cleaning, or cooling produce with contaminated water, poor  
620 hygienic practices of workers that harvest and process the produce, and lack of adequate  
621 cleaning and sanitizing of equipment that encounters the product. Inspections of 11 farms and  
622 pack houses found human feces and toilet paper in the growing fields and around facilities;  
623 inadequately maintained and supplied toilet and hand washing facilities (no soap, no toilet  
624 paper, no running water, no paper towels) or a complete lack of toilet and hand washing  
625 facilities; food-contact surfaces (such as plastic crates used to transport cilantro or tables where  
626 cilantro was cut and bundled) were visibly dirty and not washed; and water used for purposes  
627 such as washing cilantro was vulnerable to contamination from sewage/septic systems  
628 (Graczyk et al. 1998). In these cases, the transfer was either from direct contact with human  
629 feces in the field, on supplies, workers hands and/or contaminated wash water. An increase in  
630 the chance for cross-contamination over a larger volume was observed after the cilantro was cut  
631 or chopped (Abanyie et al, 2015) (8).

632  
633 Fresh produce growers, harvesters, processors, and shippers need to be aware of  
634 potential mechanisms for fresh produce to be contaminated with *C. cayetanensis* and the best  
635 practices to manage the potential risk. Farm workers can be carriers of *Cyclospora* and may or  
636 may not be symptomatic and aware of their illness, although conducting surveys of laborers in  
637 the United States will require satisfactorily addressing ethical and legal concerns. Food safety  
638 programs at growing operations that are intended for *Cyclospora* should include training for  
639 workers handling fresh produce on general hygiene, “sick worker” policies, personal protective  
640 equipment (gloves, boots, aprons, etc.) as well as management of sanitary facilities (permanent  
641 or temporary), assessment of agricultural water for potential human waste contamination, and  
642 appropriate handling of tools and equipment. There are numerous resources available to fresh  
643 produce operations and the respective supply chain that provide training materials, best  
644 practices, and assessment tools for mitigation of food safety risks associated with *Cyclospora*  
645 (REFs).

646  
647 *Cyclospora* oocysts shed in the feces of an infected person require maturation (sporulation)  
648 outside of the host (in the environment) to become infective. Once contaminated feces are in  
649 the production environment, they can contaminate water and soil which could serve as potential  
650 routes of contamination. Fresh produce growers, harvesters, processors, and handlers must be  
651 aware that human waste can enter water systems, especially open water sources, overhead or  
652 furrow irrigation, ditches in which water can accumulate, and sewage system infiltration. Other  
653 potential sources of human waste contamination include recreational vehicles and portable  
654 toilets near a growing field (REFs). It remains to be determined how effective against *C.*  
655 *cayetanensis* are chemicals typically used in portable toilets, or chlorine (or other sanitizers)  
656 used to treat agricultural water. Therefore, it’s critical that a growing operation complete an  
657 assessment of surrounding land uses, the management of nearby permanent or portable toilets  
658 as well as other possible points of contamination from human feces, such as boots or clothing to  
659 build a comprehensive prevention plan.

660  
661

662  
663

## Prevalence/Persistence and Indicators

### 664 **Q1: Prevalence, incidence, and burden**

665 **What is known about the prevalence, incidence, and burden of disease of cyclosporiasis**  
666 **in the U.S. and internationally?**

- 667 a) **Are there specific segments of the U.S. population that may be at higher risk for**  
668 **infection? What is the geographic distribution of cases in the U.S.?**
- 669 b) **What is the diversity of *C. cayetanensis* genotypes in the US and internationally?**
- 670 c) **What factors (e.g., food safety practices, location of the farms) may contribute to**  
671 **contamination with *C. cayetanensis*?**
- 672 d) **Are certain factors (e.g., type of food, seasonality, where the food is produced,**  
673 **degree of hand contact during growing and harvesting) more significant than**  
674 **others?**

675  
676 The response below highlights the distribution of *C. cayetanensis* infections and illness  
677 outbreaks both in the U.S. and internationally. Many cases of cyclosporiasis illness in the US  
678 are associated with people who have traveled to other countries. Other domestic illnesses have  
679 not been associated with specific geographical areas in the US. There is evidence that young  
680 or immunocompromised people are more susceptible to infection than the general population in  
681 the U.S. The question (1b) of diversity of *C. cayetanensis* genotypes is discussed in the  
682 Question 6 response. The factors (e.g., food safety practices, location of the farms) that may  
683 contribute to contamination with *C. cayetanensis* (Question 1c) are discussed with the  
684 responses to Questions 4, 14 and 15. Additional question responses discuss factors that can  
685 prevent contamination. Factors that may be more significant for increasing the incidence of  
686 cyclosporiasis or detection of *Cyclospora* (Question 1d) are discussed in the Question 2  
687 response and elsewhere in this report.

688  
689 **Distribution of *C. cayetanensis* infections and illness outbreaks internationally.** At least  
690 54 countries have documented *C. cayetanensis* infections and 13 of them have recorded  
691 cyclosporiasis outbreaks. Although *Cyclospora* appears to have a worldwide distribution,  
692 detailed epidemiological information on this pathogen group is still scarce for most countries  
693 around the world. Most of the information concerning the epidemiology of *Cyclospora* is from  
694 travelers and inhabitants of areas where this protozoon is endemic, such as Haiti, Guatemala,  
695 Peru, and Nepal. Ortega and Sanchez (2010) summarized data and information from 198  
696 publications in a review article. They summarized that the clinical presentation is different in  
697 areas of endemicity, where asymptomatic infections are more frequent with younger children  
698 reporting more severe clinical symptoms, and infections to be milder and severity of disease to  
699 be milder as children got older. For example, the prevalence of *Cyclospora* in children in Peru  
700 with ages from 1 to 2.5 years was 18%, whereas the prevalence was 6% in children with ages  
701 from 1 month to 1.5 years. The authors hypothesize that the difference in prevalence rates for  
702 *Cyclospora* in these studies reflect the age at which children were exposed to the parasite, most  
703 likely from foods (Ortega et al. 1993). The prevalence of *Cyclospora* in Nepalese children aged  
704 6 to 60 months who also had diarrhea was 5%, while only 2% of asymptomatic children had  
705 cyclosporiasis (Hoge et al. 1995).

706  
707 Giangaspero and Gasser (2019) provided an assessment of the prevalence of *C. cayetanensis*  
708 infection in humans determined using coprological or molecular tests. They report higher  
709 prevalence rates of cyclosporiasis in endemic countries with 5.6 % in China, 9.2% in Nepal,  
710 17.4% in Turkey and up to 22% in India. Similarly, prevalence rates of 7.9% in Haiti, 10.8% in  
711 Brazil, 24.2% in Venezuela and up to 41.6% in Peru were reported for Latin America. Among  
712 African countries, prevalence rates of 10% in Egypt and 7.2% in South Africa were reported.  
713 Lower prevalence rates were reported in non-endemic countries, from 1.9% in Canada to 0.1%  
714 in the Czech Republic, to 2.6% in Germany although there was a much higher prevalence rate  
715 of 27.5% in Italy in 2015. In areas where *Cyclospora* is not endemic, infections are  
716 symptomatic, with some reports of severe clinical manifestations (REFs).

717  
718 *C. cayetanensis* infections are commonly reported in endemic areas with low-  
719 socioeconomic levels, although large outbreaks have also been documented in developed  
720 countries. Among susceptible populations, the highest prevalence has been documented in  
721 immunocompetent individuals with diarrhea (Li et al. 2020). The disease is self-limiting in most  
722 immunocompetent patients, but it may present as a severe, protracted, or chronic diarrhea in  
723 some cases, and the parasite may colonize extra-intestinal organs in immunocompromised  
724 patients (Mansfield and Gajadhar, 2004). Authors also report a very low incidence rate of  
725 *Cyclospora* in malnourished children and people with HIV/AIDS which seem to contradict the  
726 findings of other published reports. (Pratdesaba et al. 2001). Ramezanzadeh et al. (2022)  
727 concluded that the prevalence of *C. cayetanensis* infections among people living with HIV  
728 and/or AIDS is higher, and this sub-population is more prone to gastrointestinal disease and  
729 diarrhea due to infection.

730  
731 Epidemiological studies conducted in Guatemala at three raspberry farms, two of which  
732 were involved in the 1996 cyclosporiasis outbreak in the U.S., showed that children were five  
733 times more likely to show cyclosporiasis than adults, and AIDS patients reported higher rates of  
734 infection. Infections were more common in the warmer months, coinciding with the spring  
735 raspberry harvest. The overall prevalence of *Cyclospora* was 2.3% with higher detection  
736 between May and August, with the highest incidence rate of 6.7% in June. High levels of fecal  
737 contamination were noted in the rivers from May to July with estimates of 15,000 or more  
738 oocysts per 10 liters (Bern et al. 1999). Curiously, Pratdesaba et al. (2001) reported no cases  
739 of *Cyclospora* in fecal samples of raspberry farm workers in Guatemala in a one-year study.

740  
741 **Distribution of *C. cayetanensis* infections and illness outbreaks in the U.S.** Hall et al.  
742 (2012) summarized data regarding laboratory-confirmed cases of *Cyclospora* infection in the  
743 U.S. reported during 1997-2009 via the Foodborne Diseases Active Surveillance Network  
744 (FoodNet), which gradually expanded to include 10 sites (Connecticut, Georgia, Maryland,  
745 Minnesota, New Mexico, Oregon, Tennessee, and selected counties in California, Colorado,  
746 and New York) that represent approximately 15% of the US population (Hall et al. 2012). A total  
747 of 370 cases were reported during this period, with 70.3% (260) of cases from residents of  
748 Connecticut (134 [36.2%]) and Georgia (126 [34.1%]), which accounted for 29.0% of the total  
749 FoodNet population under surveillance.

750

751 About a third of the 1,110- laboratory confirmed sporadic cases of cyclosporiasis in the  
752 U.S., recorded by the CDC from 1997 to 2008, were linked to persons with a known history of  
753 international travel who might have become infected while traveling outside the continental  
754 United States. The majority (278 [69.8%]) of onset or diagnosis dates for domestically acquired  
755 cases occurred during April-August (Hall et al. 2011). The authors report that some of these  
756 cases were outbreak-associated but were not linked to other cases, in part because of a lack of  
757 molecular tools. Overall, the case-patients' median age was 44 years (range: 3 months-96  
758 years); 50.5% were female, 47.2% were male, and the sex was unknown for 2.3%. Gender  
759 does not have a significant effect on the *Cyclospora* infection rate in different geographical  
760 areas. In endemic areas where water and food sanitation are poor or non-existent,  
761 cyclosporiasis seems to be particularly affecting children (Bern, 2002).

762

763 A total of 372 case-patients (33.5%) had a documented history of international travel  
764 during the two-week period before symptom onset or diagnosis, 398 (35.9%) reported no  
765 international travel, and 340 (30.6%) had an unknown travel history. Among the 398 case-  
766 patients classified as having domestically acquired cases, 124 persons (31.2%) lived in Florida,  
767 and 64 persons (16.1%) lived either in NYC (49 persons) or elsewhere in New York state (15  
768 persons). The extent to which the geographic concentration reflects higher rates of testing, more  
769 sensitive testing methods, or higher exposure/infection rates is unknown. Of note, cyclosporiasis  
770 is a reportable disease in 43 states, the District of Columbia and New York City (CDC, 2022).  
771 Casillas et al. (2019) reported that five of the ten outbreaks of cyclosporiasis investigated during  
772 this period were linked to foods of domestic and international origin. They indicate that many of  
773 the sporadic domestically acquired cases might have been associated with identified or  
774 unidentified outbreaks, and the potential associations were not detected with the available  
775 epidemiological information .

776

777 The five-year surveillance data from the U.S for the period 2011- 2015 shows seasonal  
778 increases in reported cases of cyclosporiasis during spring and summer months. Barratt et al.  
779 (2022) suggest that distinct genotypes (or species) of *Cyclospora* may be responsible for the  
780 outbreaks occurring earlier and later in the summer, this report is discussed in more detail  
781 below.

782

## 783 **Q2: Seasonality, incidence, and prevalence**

784 **How does the seasonality, incidence and prevalence of cyclosporiasis compare**  
785 **throughout the United States and internationally and what factors may contribute?**

786 a) **Extrinsic factors that may influence sporulation and survival (e.g., extrinsic**  
787 **factors influencing sporulation and survival);**

788 b) **Environmental factors influencing movement (e.g., rainfall);**

789 c) **Other factors?**

790 Cyclosporiasis exhibits a seasonal pattern globally. In the U.S., the peak season occurs from  
791 May to August. The seasonality of infections varies geographically, and infections can be more  
792 prevalent in dry seasons or in rainy seasons. Detection frequencies of *Cyclospora* oocysts  
793 throughout the year can vary and may not correlate to patterns of seasonal infections. The

794 factors contributing to the seasonality of cyclosporiasis are not fully known, and the variations  
795 across regions cannot be attributed to a single common factor, although recent evidence  
796 suggests that distinct genotypes (or species) of *Cyclospora* may be responsible for the  
797 outbreaks occurring in different seasons (Barratt et al., 2023 REF). The sporulation and survival  
798 of *Cyclospora cayetanensis* can be influenced by various external factors. While the application  
799 of some cold and hot temperatures affects sporulation and survival, exposure to some  
800 commonly used pesticides and antimicrobial chemicals has been shown to have a limited effect.

801  
802 **Environmental factors influencing seasonality of incidence or prevalence of**  
803 **cyclosporiasis.** *C. cayetanensis* infection is remarkably seasonal worldwide (REF). This  
804 seasonality varies by region, most likely due to human activities, environmental contamination,  
805 and the optimal sporulation conditions in each area. The reasons for the apparent absence of  
806 symptomatic human infection for prolonged periods, where the parasite is present in the  
807 environment, and which biological conditions are needed for the survival of the parasites during  
808 these prolonged periods is unknown. Factors such as rainfall, temperature, humidity, and  
809 perhaps photoperiod could affect the seasonality, which clearly cannot be related to rainfall  
810 alone, as there is a marked seasonal variation in very dry environments (REF). The incidence of  
811 *C. cayetanensis* infection increases in warm periods of maximal rainfall in countries such as  
812 Guatemala, Honduras, Mexico, Jordan, Nepal or China (REF). These conditions contribute to  
813 the contamination of water supplies with *Cyclospora* oocysts (REFs). However, infection is more  
814 prevalent in the absence of rain, during the drier and hotter months of the year in Peru and  
815 Turkey. In Haiti, infections occur during the driest and coolest times of the year, or during the  
816 cooler wet season in Indonesia. In India, clinical cases were more frequent in the summer  
817 before the rainfall period (REF). Therefore, it is difficult to explain a common factor for the  
818 differences observed in seasonality.

819  
820 In a study conducted in Colombia by Frickmann et. al., (2021), fewer individuals (2/16,  
821 12.5%) reported gastrointestinal symptoms in the rainy season compared to the dry season  
822 (6/15, 40%) despite higher parasite loads in the rainy season. A considerable prevalence of *C.*  
823 *cayetanensis* in Colombian indigenous people persists in the dry season. Low proportions of  
824 gastrointestinal symptoms along with higher parasite loads make colonization likely rather than  
825 infection, and the data between environmental detection of the parasite and clinical presentation  
826 in the population remains unexplained.

827  
828 Cyclosporiasis cases are reported throughout the year in the U.S., but there is an  
829 increase in domestically acquired cases from May to August. During non-outbreak periods  
830 between 1992 and 1995, the rate of *Cyclospora* endemic infection in the general population of  
831 North America and the United Kingdom was less than 0.5% (REF). However, there were  
832 variations in the prevalence of infection across different regions within the U.S. Between 1997  
833 and 2009, out of a total of 370 laboratory-confirmed cases of *Cyclospora* infection reported  
834 through the Foodborne Diseases Active Surveillance Network, the majority (70.3%) were  
835 concentrated in Georgia and Connecticut. In the period from 2004 to 2009, 37.8% (70/185) of  
836 the cases were classified as domestically acquired. It is important to note that while  
837 cyclosporiasis is not considered endemic in the U.S., there is a possibility of localized areas with

838 low-level endemicity (REF). Additional research into domestic prevalence, environmental  
839 contamination, and endemicity could be considered.

840

841 The factors contributing to the seasonality of cyclosporiasis are not fully known, and the  
842 variations across regions cannot be attributed to a single common factor. There is still  
843 uncertainty regarding the absence of symptomatic human infection during certain periods when  
844 the parasite is present in the environment and the specific biological conditions required for  
845 parasite survival during these periods. In non-endemic industrialized nations, individual cases  
846 and outbreaks are primarily linked to international travel and the consumption of contaminated  
847 imported produce from endemic regions. *Cyclospora* oocysts have been detected in produce  
848 outside the typical seasonality of cyclosporiasis cases in the US, indicating the potential year-  
849 round presence of oocysts in certain produce. However, the detection of oocysts does not  
850 necessarily imply their sporulation or infectivity, nor does it guarantee illness if consumed.

851

852 Barratt et al (2023) suggested that, at least in part, the seasonality of domestic  
853 outbreaks can be explained by the distinct genotypes (or species) of *Cyclospora*, with the  
854 Lineage A being responsible for the outbreaks appearing earlier in the season and peaking  
855 around June, and Lineage B most prevalent in outbreaks later in the season peaking around  
856 July. While this is an intriguing hypothesis, it is important to note that each of these “domestic”  
857 lineages included at least one isolate common to areas of Mexico and/or Central America where  
858 the majority of the US seasonal labor force originates. These genomic data should be analyzed  
859 in the systems context which includes seasonal crop production patterns.

860

861 **Extrinsic factors that may influence sporulation and survival of oocysts.** *Cyclospora*  
862 oocysts are formed in enterocytes, excreted unsporulated in feces, and require sporulation to  
863 become infective to a host. Transmission usually occurs through the ingestion of oocysts found  
864 in fecally-contaminated water or produce. Direct person-to-person transmission is unlikely as  
865 the excreted oocysts are not infectious, requiring sporulation to take place outside the host  
866 before becoming infective. The median incubation period is approximately one week, during  
867 which the organism invades the enterocytes of the small intestine (REF). It is worth noting that  
868 oocysts from some patients with severe diarrhea may not undergo sporulation (REF).

869

870 The sporulation and survival of *Cyclospora cayetanensis* can be influenced by various  
871 external factors. For example, under laboratory conditions at temperatures of 22°C and 30°C,  
872 sporulation of *Cyclospora* oocysts stored in deionized water or potassium dichromate typically  
873 takes place within 7–14 days outside the host. However, exposure of oocysts to temperatures of  
874 37°C for 4 days or 50°C for 1 hour has been observed to induce sporulation. Conversely,  
875 storage at 4°C or 37°C for 14 days delays sporulation, with only 12% of human- and baboon-  
876 derived *Cyclospora* spp. sporulating under such conditions. Interestingly, oocysts that were  
877 stored at 4°C for one to two months sporulated when subsequently stored for six to seven days  
878 at 30°C (REF).

879

880 The effects of temperature, including freezing and heating conditions, on the sporulation  
881 of *C. cayetanensis* were investigated in dairy products and basil. Sporulation was observed in

882 these matrices at 23°C, but extreme temperatures led to the inactivation of oocysts. No  
883 sporulation occurred at temperatures of -70°C, 70°C, and 100°C for both water and basil  
884 samples. Similarly, dairy products did not exhibit sporulation when cooked at 70°C, frozen at -  
885 70°C for 1 hour, or exposed to -15°C for 24 hours. Basil kept at -20°C for two days and water  
886 stored for four days also did not support oocyst sporulation. Additionally, the use of  
887 recommended concentration levels of pesticides, including fungicides and insecticides, or  
888 combinations of these products did not affect the sporulation of *C. cayetanensis*. Due to the  
889 limited understanding of the mechanisms triggering sporulation in *Cyclospora cayetanensis*  
890 oocysts and the factors influencing their survival, it would be prudent to investigate factors that  
891 affect sporulation and survival in similar parasites. Particularly, the examination of surrogate  
892 organisms in future challenge studies could provide valuable insights into the study of  
893 *Cyclospora cayetanensis* (REF).

894

#### 895 **Q10: Persistence/survival in food and the environment**

#### 896 **What is known about *Cyclospora cayetanensis* persistence/survival in food, such as** 897 **produce, and the environment (e.g., soil, water, food contact surfaces)?**

898 *C. cayetanensis* oocysts have been detected in several types of water including chlorinated and  
899 unchlorinated drinking water, food/agricultural process water, wastewater, recreational waters,  
900 and well water. Furthermore, this organism has been detected in areas where soil can contact  
901 human feces and in areas where there is a lack of personal hygiene. Further research is  
902 needed to elucidate survival times and sporulation rates in water, soil, and food or agriculture  
903 process environments.

904

905 Water and soil contaminated with fecal matter may act as a vehicle of transmission for  
906 *C. cayetanensis* infection. In endemic areas, drinking water has been determined as a risk  
907 factor for cyclosporiasis. *C. cayetanensis* oocysts have been detected in several types of  
908 water—including chlorinated water, and wastewater in endemic areas and in non-endemic  
909 areas—which suggests the potential spread of the parasite via drinking and recreational water  
910 (Almeria et al. 2019) (Rabold et al. 1994) (Kwakye-Nuako et al. 2007). Oocysts can pass  
911 through physical barriers and are not affected by chlorine and other water disinfectants  
912 (Mansfield and Gajadhar, 2004). Studies conducted in Guatemala concluded that significant  
913 risk factors for cyclosporiasis, among children <2 years of age, were drinking untreated water  
914 and soil contact. These studies also found that among 182 people in the cohort, four farm  
915 workers had asymptomatic cyclosporiasis (Bern et al. 1999).

916

917 Exposure to recreational water contaminated with *C. cayetanensis* oocysts may also be a  
918 source of infection (Bilung et al. 2017). Nine percent of water samples (20 out of 233) collected  
919 along a river in Spain over a one-year period tested positive for *Cyclospora* spp. with 17/20  
920 positive in a qPCR with primers amplifying 116-bp fragments in the internal transcribed spacer 2  
921 (ITS-2) gene (Lalonde and Gajadhar, 2008) (Galvan et al. 2012). Nine of 48 samples of influent  
922 and effluent water from wastewater treatment plants in Arizona showed the presence of *C.*  
923 *cayetanensis*. The authors reported that they did not determine the efficacy of the removal of  
924 *Cyclospora* in the treatment process (Kitajima et al. 2014). These studies show that fecally  
925 contaminated water could be a potential source of *Cyclospora* contamination.

926

927 Soil is a potential and possibly important mode of transmission and source of infection  
928 for *C. cayetanensis*. Some studies have included contact with contaminated soil as a risk factor  
929 for *C. cayetanensis* infections, in both developing and developed countries (Mansfield and  
930 Gajadhar, 2004). In Venezuela, for example, most cases of *C. cayetanensis* were clustered in  
931 the areas of extreme poverty where living in a hut, not having a toilet, and having contact with  
932 soil contaminated with human feces were strongly associated with infection. *C. cayetanensis*  
933 was more prevalent where agricultural work and lack of hand washing were present. In Italy, soil  
934 was found to be positive for oocysts (11.8% positive samples, 6/51) (Giangaspero et al. 2015a).  
935 Higher rates of infection have been noted in additional areas where risk factors such as deficient  
936 sanitary facilities, poor personal hygiene, and soil contaminated with human feces were present.

937

### 938 **Q13: Indicator organisms**

939 **Are there indicator organisms that can be used to determine the likely presence or**  
940 **absence of *C. cayetanensis* in various matrices?**

941

942 An indicator organism is a microorganism or group of microorganisms that may indicate a  
943 possible presence of a pathogen of concern, that are typically present in much lower numbers  
944 than indicators or that conditions under which an indicator increases in numbers may favor  
945 pathogen growth (Busta, et al., 2003). Indicator organisms for parasites such as *C.*  
946 *cayetanensis* are difficult to identify. Since *C. cayetanensis* can only originate from human  
947 feces, an indicator of human fecal pollution is likely to provide a practical solution. The  
948 committee acknowledges the multitude of studies on advantages and also limitations of  
949 indicators of human fecal contamination, as well as at least a dozen existing and at least that  
950 many proposed indicators of human fecal contamination.

951

952 A study by Mattioli et al. attempted to correlate the presence of a fecal indicator bacteria,  
953 *Escherichia coli*, and human-specific fecal molecular markers, Bacteroides HF183 and  
954 crAssphage with the presence of *C. cayetanensis* in the crop production environment (REF).  
955 However, while this study detected the presence of some of these markers of human fecal  
956 pollution, *C. cayetanensis* was not detected in any of the samples. This outcome should not be  
957 considered discouraging as indicators often overestimate the potential for the presence of  
958 fecally-shed human pathogens. Given that essentially nothing is known about persistence of *C.*  
959 *cayetanensis* in the environment and given that oocysts of the parasites are currently in a limited  
960 supply to conduct correlational or comparative studies with well-characterized indicator  
961 organisms, it is unclear how productive efforts to identify a “perfect indicator” for the presence of  
962 *C. cayetanensis* would be. Collectively, these results indicate that future efforts should continue  
963 to programs on risk-based management, not on efforts to manage hazards, whether potential or  
964 perceived as potential.

965

966

### 967 **Analytical Methods**

968 **Isolation, Concentration, Detection and Confirmation**

969 As discussed throughout this report, *C. cayetanensis* is parasite with a host range that is limited  
970 to humans, while many other animals host very closely related organisms that are  
971 nonpathogenic in humans. This, therefore, highlights the primary challenge with the isolation,  
972 concentration and detection of *C. cayetanensis*: any *Cyclospora* isolated from a human fecal  
973 sample is almost certainly *C. cayetanensis* (because humans act as “biological concentrators”  
974 of the parasite), however, environmental isolates of *Cyclospora* could have originated from a  
975 nearly infinite number of potential hosts of non-human parasites. Because a *Cyclospora* from a  
976 human sample is almost certainly *C. cayetanensis*, a fairly generic target (such as 18S  
977 ribosomal RNA gene) for the typing at the genus level is practically sufficient (to distinguish from  
978 other eukaryotic or procaryotic causes of gastrointestinal symptoms). However, using 18S  
979 ribosomal RNA genes as targets for environmental samples has led many researchers to  
980 erroneous conclusions about prevalence of *C. cayetanensis* in environmental samples collected  
981 in regions where the parasite is not endemic. These limitations were highlighted by recent  
982 studies of Mattioli (REF), and a retrospective re-analysis of samples previously thought to be *C.*  
983 *cayetanensis* by Ortega (REF). A nearly 90% false-positive rate for PCR-based assays using a  
984 common method targeting 18S ribosomal RNA genes highlights the need for a more robust and  
985 reproducible method for the detection of the parasite to the species level in environmental  
986 samples.

987  
988 In the absence of a robust, specific and reproducible single-step method for the detection of *C.*  
989 *cayetanensis*, there remains the need for confirmatory molecular methods of the PCR-positive  
990 samples from implicated foods and potential contamination sources. A genotyping system for  
991 *Cyclospora* based on eight genetic markers has been applied to human clinical samples  
992 (Almeria et al. 2019). This approach, although helps to discriminate between clinical cases, still  
993 requires development for food sampling and improved cluster detection, and does not alleviate  
994 the concern that only a genus-level detection is practically sufficient for clinical samples, while at  
995 least species-level (and ideally strain-level) detection is required for environmental samples.

996  
997 Whole-genome sequencing is impractical for routine molecular surveillance of *C. cayetanensis*  
998 outbreaks because of the inability to culture the organism (which makes it difficult to obtain  
999 sufficient DNA mass from samples) and due to its large genome (44 megabases). To address  
1000 these issues, researchers have focused on the development of new methods based on potential  
1001 genomically-derived markers for strain-level identification (Nascimento et al. 2020, Gopinath et  
1002 al. 2018). One approach has been to apply bioinformatic analyses to public mitochondrial  
1003 genome assemblies to create a reference genome which can then be used in the application of  
1004 subtyping *C. cayetanensis* strains during foodborne outbreak investigations (Nascimento et al.  
1005 2020). In addition, it is worth exploring other options for the detection and differentiation of *C.*  
1006 *cayetanensis* such as infrared-functionalized microbalance sensor (Santin and Tetard, CPS  
1007 REF).

### 1008 1009 **Q3: Sampling data**

1010 **What sampling data exists for *Cyclospora cayetanensis* in food products and**  
1011 **environmental samples, domestically and internationally?**

1012 **a) What trends have been observed?**

1013 **b) What methods of detection were used?**

1014 **Summary of Question 3 Response**

1015  
1016 Currently, there are no international standards for testing for *C. cayetanensis* in the environment  
1017 and food products. Since the FDA BAM Chapter 19c detection method was validated, most  
1018 studies have used either this method or a modified methodology, however, this method targets  
1019 18S ribosomal RNA genes, and the limitations of this approach have been discussed in this  
1020 report. However, the prevailing consensus is that more methods need to be developed that are  
1021 able to isolate the small numbers of oocysts from environmental samples, in addition to the  
1022 various food matrices. Even when *C. cayetanensis* is detected in environmental samples,  
1023 additional confirmatory testing is required due to the significantly high number of false positives  
1024 from cross- reactions with related parasites that are not pathogenic in humans.

1025

1026 **Q3a). What trends have been observed?**

1027 As discussed earlier in this report, data collected from regions and countries where *C.*  
1028 *cayetanensis* is endemic should not be co-interpreted with the data from the regions where the  
1029 parasite has not established endemically. Seasonal trends and epidemiological trends for the  
1030 areas where *C. cayetanensis* is endemic have been discussed elsewhere in this report.  
1031 Epidemiological trends in the US have been discussed in response to other questions.

1032 Prior to the reports of Mattioli (REF) and Ortega (REF), detection of 18S ribosomal RNA gene  
1033 amplicons in environmental samples has been interpreted to indicate the presence of *C.*  
1034 *cayetanensis* in an environmental (primarily, water) sample. Given an alarming (~90%) false  
1035 positive rates of a common PCR-based method for the detection reliant on primers for 18S  
1036 ribosomal RNA genes, discussing trends based on the results of studies in which a definitive  
1037 confirmatory step (such as amplicon sequencing) was not performed is premature.

1038 **Q3b). What methods of detection were used?**

1039 Currently, there are no recognized International Organization for Standardization methods for  
1040 detecting *C. cayetanensis* in foods and the environment. Most studies have been conducted  
1041 using BAM 19b, BAM 19c, or a modification. (Lalonde, L. et al 2022). Current 18S-based  
1042 methodologies do not appear to be sufficiently sensitive to distinguish *C. cayetanensis* from  
1043 *Eimeria* or *Isospora* species. (Mattioli et al. 2022)

1044 The Center for Produce Safety (CPS) sponsored a study, from January 2020 through April  
1045 2022, to examine the sources and prevalence of *C. cayetanensis* in irrigation water, harvested  
1046 produce (using spent packinghouse water in dump tanks as a proxy for the produce), and  
1047 municipal wastewater in the Southeastern Coastal Plains region in Georgia. (Mattioli 2022).

1048 At the start of the project in 2020, the researchers collected samples from the surface-fed  
1049 holding ponds once a month during the fallow and growing periods and twice a month during  
1050 harvesting. In 2021, the sampling frequency was increased to twice a month during the fallow  
1051 and growing seasons. The researchers collected weekly samples from the spent packinghouse  
1052 water in the dump tanks, the spent water being used as a proxy for harvested produce. The  
1053 samples were either filtered onsite or, if the turbidity was too high, the samples were sent to the

1054 CDC. Municipal wastewater sludge samples were taken from the thickener sludge and from  
1055 the return activated sludge from the aeration basin, Dead-end Ultrafiltration was used to  
1056 concentrate holding pond water samples and continuous flow centrifugation was used to  
1057 concentrate dump water from the packinghouses. Sludge and portable toilet samples were  
1058 concentrated via centrifugation. All samples underwent DNA extraction followed by quantitative  
1059 PCR (qPCR). BAM Chapter 19C defines a positive as any sample that has at least one of the  
1060 three qPCR replicates below a  $C_q$  of 40. The researchers deviated from the cutoff  $C_q$  value in  
1061 BAM 19C. Instead, they used a  $C_{q\ of} \leq 37$ , to reduce the number of false positives. This should  
1062 have increased (not decreased) the sensitivity of the method by  $\times 3$ . Samples with at least one  
1063 replicate with a  $C_q \leq 37$  were submitted to the CDC Parasitic Branch. This was useful to  
1064 eliminate false-positive results. Of the 217 samples from eight surface-fed holding ponds, 18S  
1065 rRNA amplicons were detected in 59 (27%). 18S rRNA amplicons were detected in only one of  
1066 46 (2%) dump tank water samples. No 18S rRNA amplicons were detected in the 37 samples  
1067 from the on-farm portable toilets. Of the total of 76 sludge samples, 18S rRNA amplicons were  
1068 detected in nine (20%) sludge from the thickener and nine (30%) return activated sludge.  
1069 However, of the samples submitted for amplification, only one sample matched *C. cayetanensis*  
1070 haplotypes from clinical specimens, which indicated low level community shedding. Despite  
1071 positive 18S rRNA amplicon detections, their sequencing failed to confirm amplicons as those  
1072 belonging to *C. cayetanensis*. Furthermore, positive qPCR detection in irrigation pond samples  
1073 was not associated with human fecal contamination (Mattioli et al. 2022), consistent with the fact  
1074 that the detection of amplicons resulted from cross-reactivity with non-human isolates of  
1075 *Cyclospora* relatives.

1077 Giangaspero et al conducted the first comprehensive molecular survey, over a two-year period  
1078 from 2012 to 2014, looking for *C. cayetanensis* in southern Italy. They examined water (treated  
1079 water from the municipal treatment plants, drinking water, and well water used for irrigation),  
1080 eight types of vegetables and fruits (cucumber, lettuce, fennel, celery, tomato, melon, endive,  
1081 and chicory), farm soil from the bases of the selected vegetables and fruits, and human fecal  
1082 samples, that had been submitted to the main area hospital. The water samples were filtered  
1083 through a 1  $\mu\text{m}$  yarn-wound cartridge filter which was backflushed three times then  
1084 concentrated using centrifugation. Likewise, soil and produce samples were placed in  
1085 suspension, centrifuged and filtered through double gauze and the filtrate again centrifuged. All  
1086 sedimented pellets were subjected to Percoll-sucrose flotation and DNA extraction. The  
1087 samples were tested using qPCR-coupled single strand conformation polymorphism (SSCP)  
1088 analysis and DNA sequencing. Giangaspero et al detected *Cyclospora* DNA in 21.3% of treated  
1089 water samples and 6.2% of well water samples but did not detect *Cyclospora* DNA in drinking  
1090 water samples. Detection rates in soil and produce samples were 11.8% and 12.2%  
1091 respectively. (Giangaspero et al. 2015c). The survey did not use controls, therefore, as seen  
1092 with other studies, it is difficult to determine if the positive samples cross-reactions and,  
1093 therefore, false positives.

1094 Table 2. CPS Report Results, Mattioli et al (2022)

Sample source	n	18S rRNA detected	% Detection	Confirmed <i>C. cayetanensis</i>
Irrigation ponds	217	59	27	0
Packinghouse dump tanks	46	1	2	0
Municipal wastewater sludge (RAS/REC)	46/30	9/9	20%/30%	7
Portable toilets	37	0	0	0

1095

1096

Table 3. Southern Italy Survey Results, Giangaspero et al (2015)

Sample source	n	% Detected <i>Cyclospora</i> DNA
Well water used for irrigation	16	6.2
Treated water from municipal treatment plants	94	21.3
Drinking water	3	0
Farm soil surrounding produce	51	11.8
Produce (vegetable and fruit crops)	49	12.2
Human feces (submitted to main hospital)	40	27.5

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**Q6: Approaches for characterizing**

1101

**What are available approaches for characterizing the relatedness of different strains of *C. cayetanensis* (e.g., subtyping)?**

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1104

Clearly understanding relatedness of strains and species of *C. cayetanensis* has at least two practical implications. First, there is a need to define genomic targets for the specific detection and differentiation of strains of *Cyclospora* capable of causing human illness, as currently available tools based on the amplification of 18S rRNA genes fail to do so reproducibly and robustly. Second, the question of endemicity of *C. cayetanensis* in the U.S. remains open (with environmental sampling data being called into question and the uncertainty with the interpretation of sewage data as the main argument for endemicity). Robust and conclusive molecular evidence will be required to address it. For example, does clustering of *C. cayetanensis* from domestic outbreaks with seemingly random isolates from a number of countries where the pathogen is endemic and most agriculture labor force originate argue for the “exotic introduction” hypothesis for the origin of the parasite in each outbreak? If *C. cayetanensis* has established endemically in some areas of the U.S., how soon should we

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1116 expect genome-level separation of the “US isolates”, given that the parasite has a diploid  
1117 genome and undergoes sexual reproduction? The presence of distinct regional clusters is  
1118 supported by current studies (Barratt REF), however, it remains to be elucidated whether it took  
1119 years or decades for these regionally-distinct genotypes to evolve. Given that *C. cayetanensis*  
1120 can only reproduce inside the human host and given a relatively low prevalence of human  
1121 cyclosporiasis in the U.S., the temporal scale of evolution of the geographically distinct strains  
1122 may be longer than what is expected for areas where the pathogen is endemic and cycles  
1123 rapidly through human populations.

1124

1125 Recently, whole genome assemblies, complete mitochondrial and apicoplast genomes of *C.*  
1126 *cayetanensis* have become available (Cinar et al. 2016). Cluster analysis of specific *C.*  
1127 *cayetanensis* apicoplast genomes revealed tight grouping of *C. cayetanensis* with *Eimeria* and  
1128 *Toxoplasma*, separated from distant species such as *Plasmodium* and *Babesia*. Single  
1129 nucleotide polymorphisms (SNPs) and identified DNA sequence repeats may be useful as  
1130 genetic markers for identification and differentiation of *C. cayetanensis* isolates found and could  
1131 facilitate outbreak investigations (Cinar et al. 2016) The mitochondrial genome and apicoplast  
1132 genomes of *C. cayetanensis* have a high similarity to *Eimeria* spp., which has clearly  
1133 complicated PCR-based detection of the parasite in environmental samples. The chromosome  
1134 genome of *C. cayetanensis* has important differences that help to differentiate this organism  
1135 from other apicomplexans. Human *C. cayetanensis* isolates from around the world have  
1136 noticeable geographic clusters. *C. cayetanensis* genotyping methods, using targeted amplicon  
1137 sequencing, are useful for epidemiological trace-back investigations (Cinar et al. 2020).  
1138 Molecular typing of *C. cayetanensis* in produce and clinical samples can distinguish between  
1139 case clusters and may be helpful for cyclosporiasis outbreak investigations. (Zhang, et al.  
1140 2021).

1141 To supplement the epidemiological data with genetic information, (Yanta et al. 2022)  
1142 genotyped isolates from stool samples in 169 Canadian cyclosporiasis cases which occurred  
1143 between 2010 to 2021. An eight-marker targeted amplicon deep (TADS) scheme specific to *C.*  
1144 *cayetanensis* as previously described by the U.S. Centers for Disease Control and Prevention  
1145 (CDC) was used. Their study focused on evaluating the genotyping performance and genetic  
1146 clustering of the Canadian *C. cayetanensis* isolates and reports that genotype information was  
1147 successfully collected with at least part of one of the markers in the TADS assay for 97.9% of  
1148 specimens, and 81.1% of cyclosporiasis cases met the minimum requirements to genetically  
1149 cluster into 20 groups. The authors conclude that examining cyclosporiasis cases genetically  
1150 will be a valuable tool for supplementing epidemiological outbreak investigations and further  
1151 research is required to expand the number of discriminatory markers to improve genetic  
1152 clustering. From March 2018 to October 2020, a total of 3459 *C. cayetanensis* genotypes were  
1153 sequenced from fecal specimens collected from patients who received a diagnosis of  
1154 cyclosporiasis in the U.S. or Canada, and from 4 specimens collected before 2018  
1155 ((Nascimento et al. 2020); (Barratt et al. 2021), (Barratt et al. 2022)).

1156

1157 Barratt et al., (2023) reported genotyping thousands of US isolates and 1 from China (strain  
1158 CHN\_HEN01) and revealed two lineages. Their retrospective examination of epidemiologic data  
1159 revealed associations between lineage and the geographical distribution of U.S. infections plus

1160 strong temporal associations. With the multiple lines of evidence for speciation within human  
1161 infecting *Cyclospora*, the authors provide an updated taxonomic description of *C. cayetanensis*  
1162 and describe two novel species as etiological agents of human cyclosporiasis: *Cyclospora*  
1163 *ashfordi* sp. nov. and *Cyclospora henanensis* sp. nov. (Apicomplexa: Eimeriidae). The Barratt  
1164 et al. (2023) study may be the first study suggesting the existence of two “US  
1165 species/genotypes” of *Cyclospora*, a potential evidence that the parasite is becoming endemic  
1166 in the United States. However, a critical examination of the conclusions raises the following  
1167 questions: (1) Lack of panmixia between the two “US genotypes” cannot be interpreted using  
1168 the Hardy-Weinberg principle: because *C. cayetanensis* undergoes sexual and asexual  
1169 reproduction only within a human host for Hardy-Weinberg principle to apply random and  
1170 multiple co-infections with multiple strains must occur. While this is possible in the regions  
1171 where the parasite is endemic, it is not the case in the United State. (2) Existence of regional  
1172 genotypes in the Midwest and New York (areas that experience prolonged freezing  
1173 temperatures) would be a deviation from what is assumed to be known about the climatic zones  
1174 where *C. cayetanensis* thrives. (3) The prevalence of *C. cayetanensis* Lineage A in Georgia (at  
1175 the levels observed in New England) does not fit with the observation that Lineage B is  
1176 prevalent in neighboring states. Finally, it should be noted that each of the “US lineages”  
1177 included isolates most closely related to those isolated from Mexico and Guatemala. The same  
1178 clustering of the US isolates with those from Mexico and Guatemala (where a significant  
1179 number of the non-permanent US ag laborers originate) was reported by Leonard et al (2023).  
1180 In contrast, in both studies (Barratt 2023 and Leonard 2023), isolates from Asian neighboring  
1181 countries (Nepal, China and Indonesia) cluster tightly and separately. It is unknown whether the  
1182 researchers would have reached the same conclusion if more genomes from clinical samples in  
1183 Mexico and Central America were included into the study. These early studies are interesting,  
1184 however, it is premature to use them as genetic evidence for the endemicity of *Cyclospora*  
1185 *cayetanensis* in the United States. A clear understanding of the length of time required for  
1186 speciation (or evolution of dominant genotypes) of *Cyclospora* will be required to interpret these  
1187 studies.

1188  
1189 With the recent advances in sequencing technologies such as next generation  
1190 sequencing (NGS) and availability of efficient genome assembly programs, whole genome  
1191 assemblies, complete mitochondrial and apicoplast genomes of *C. cayetanensis* have become  
1192 available (Cinar et al. 2016). Whole-genome sequence data from *C. cayetanensis* protozoa  
1193 enabled the development of a multilocus sequence typing (MLST) tool for characterizing  
1194 isolates in outbreak investigations. The high resolution of the typing tool and the apparent  
1195 presence of geographic clusters might facilitate the identification of outbreaks and infection  
1196 sources. (Guo et al. 2016). One method based on MLST has been recently developed by CDC  
1197 researchers. This method relies on the amplification of 8 genetic markers followed by deep  
1198 sequencing and bioinformatic analysis of the data. This method has been used to characterize  
1199 haplotypes of *C. cayetanensis* for molecular epidemiology purposes (Nascimento et al. 2020,  
1200 Barratt et al. 2021, Barratt et al. 2022). This method has been implemented at FDA to be used  
1201 on characterization of *C. cayetanensis* haplotypes of DNA extracted from produce and water  
1202 that is found to be positive for the presence of *C. cayetanensis*. In 2021 this MLST approach  
1203 was applied to environmental samples collected from a canal in FL. Characterization of *C.*

1204 *cayetanensis* haplotypes using this approach was possible in 6 of the 8 samples analyzed  
1205 (FDA/CDC report from August 13th, 2021- unpublished data). This was a follow up of the work  
1206 done as part of investigation to identify the root cause of the 2020 bagged salad outbreak. In  
1207 2022 FDA will begin to apply the CDC genotyping method, with modifications, to *C.*  
1208 *cayetanensis* collected from produce and water samples, which will enable the linkage of human  
1209 illness to suspect food items<sup>19</sup>.

1210

1211

1212 **Q7: Current available test methods for detecting and/or isolating**

1213 **What are currently available test methods (and comparative sensitivity/specificity) for**  
1214 **detecting and/or isolating *C. cayetanensis* in different matrices (e.g., food, water,**  
1215 **environmental samples)? What type of validation has the method(s) undergone? What**  
1216 **are the matrices for which the methods have been validated?**

1217

1218 **Detection methods**

1219 *C. cayetanensis* is an unculturable parasite, therefore all analytical methods used for the  
1220 detection and characterization of *C. cayetanensis* in different types of samples rely on  
1221 microscopy techniques, detection of the parasite's DNA (e.g., PCR methods), and/or DNA  
1222 sequencing analysis of suitable genetic markers.

1223 In clinical settings, *Cyclospora* infection is diagnosed by examining stool specimens using  
1224 various microscopy techniques and/or by PCR assays designed to detect the parasite in stool  
1225 (CDC 2023). Symptomatic patients are known to at times shed low numbers of *Cyclospora*  
1226 oocysts, therefore sample preparation techniques to concentrate the oocysts, such as the  
1227 formalin-ethyl acetate sedimentation technique, are typically used to increase the chances of  
1228 detection (CDC 2023). Smears of the resulting sediment can be stained and examined  
1229 microscopically using modified acid-fast or modified ("hot") safranin techniques, although  
1230 *Cyclospora* oocysts may not uniformly stain and appear either stained or unstained in  
1231 microscopic fields when using the modified acid-fast technique. Alternatively, an ultraviolet (UV)  
1232 fluorescence microscope (set at 330-365 nm or 450-490 nm) can be used to view *Cyclospora*  
1233 oocysts since they autofluorescence (CDC 2023). Although these microscopy techniques are  
1234 effective for clinical diagnosis, they cannot distinguish oocysts of *C. cayetanensis* from  
1235 morphologically identical oocysts of other *Cyclospora* species which may be present in food,  
1236 environmental, or other zoonotic samples (Eberhard, Pieniazek and Arrowood 1997, Eberhard  
1237 et al. 1999).

1238 *C. cayetanensis* oocysts are expected to be present in exceedingly low numbers in food and  
1239 environmental samples, when present at all. Unlike clinical samples, food and environmental  
1240 samples are expected to contain significant background populations of other parasites, including  
1241 non-pathogenic species of *Cyclospora* and closely genetically related Apicomplexan parasites,  
1242 such as species of the genus *Eimeria*. Due to the limitations of microscopy techniques to detect  
1243 *C. cayetanensis* oocysts in food and environmental samples, molecular methods, such as PCR,  
1244 represent the most feasible approach for detection in these matrices (Lalonde and Gajadhar  
1245 2008, Murphy et al. 2017, Durigan, Murphy and da Silva 2020, Kahler et al. 2021, Barlaam et al.

1246 2021, Lalonde, Oakley and Fries 2022). Sample preparation techniques, such as flocculation,  
1247 floatation, filtration, and centrifugation, have been used alone or in combination to concentrate  
1248 oocysts and improve the chances of detecting *C. cayetanensis* in food and environmental  
1249 samples. Challenges to developing molecular detection methods for *C. cayetanensis* in food  
1250 and environmental samples include matrix complexity (including the potential presence of PCR  
1251 inhibitors), the inability to culture the organism *in vitro*, and the lack of genomic sequences for *C.*  
1252 *cayetanensis* and other closely related organisms (Balan et al. 2023). Currently, FDA has  
1253 validated two methods for the detection of *C. cayetanensis*, one that is specific for detection in  
1254 fresh produce and another that is specific for detection in agricultural water. These methods  
1255 employ various sample preparation techniques followed by a quantitative real-time PCR (qPCR)  
1256 targeting the 18S rRNA gene with a species-specific probe and an internal amplification control.

1257 The current FDA method for the detection of *C. cayetanensis* oocysts on fresh produce  
1258 (Chapter 19b of the FDA Bacteriological Analytical Manual (BAM)) (FDA 2023a) was validated  
1259 in a collaborative study to detect as few as five oocysts inoculated onto 25 g samples of cilantro  
1260 or 50 g samples of raspberries (Murphy et al. 2017). This method uses a procedure to recover  
1261 inoculated oocysts from produce previously demonstrated to significantly improve the recovery  
1262 of *C. cayetanensis* oocysts from basil and lettuce and a commercial DNA extraction kit (Shields,  
1263 Lee and Murphy 2012, Murphy et al. 2017). The collaborative study included a comparison of  
1264 the nested PCR from FDA's previous method with the qPCR in the current method. Although  
1265 the nested PCR detected *C. cayetanensis* at the 5-oocyst inoculation level in a few more  
1266 inoculated samples than the qPCR method, analysis of uninoculated samples using the nested  
1267 PCR resulted in a false-positive rate of 2.6% for cilantro samples and 5.0% for raspberry  
1268 samples, whereas there were no false-positives observed for the qPCR (Murphy et al. 2017).  
1269 The performance of the current FDA method for the detection of *C. cayetanensis* oocysts on  
1270 fresh produce has since been verified for other produce matrices, such as shredded carrots,  
1271 basil, parsley, cilantro, blackberries, strawberries, blueberries, shredded cabbage, romaine  
1272 lettuce, spring mix, coleslaw, and green onions (Almeria et al. 2018, Lalonde et al. 2022).

1273 The current FDA method for the detection of *C. cayetanensis* oocysts in agricultural water  
1274 (Chapter 19c of the FDA BAM) (FDA 2023a) was validated in a multi-laboratory study to detect  
1275 as few as six oocysts in ten liters of irrigation water (Murphy et al. 2017, Durigan et al. 2020).  
1276 The previous FDA BAM method (Chapter 19a) was found to be ineffective at handling  
1277 agricultural waters with high turbidity during a *C. cayetanensis* outbreak in 2013 (Durigan et al.  
1278 2019, FDA 2023a). The current method uses hollow fibers in a dead-end ultrafiltration (DEUF)  
1279 configuration to recover inoculated oocysts from large volumes of agricultural water. A DNA  
1280 purification step was added after DNA extraction to overcome PCR inhibitors commonly found in  
1281 agricultural waters and optimize performance (Durigan et al. 2020). In addition, the qPCR was  
1282 evaluated using a panel of DNA samples from selected foodborne bacterial and parasitic  
1283 pathogens: *Cryptosporidium parvum*, *Cryptosporidium hominis*, *Eimeria acervulina*, *Eimeria*  
1284 *tenella*, *Eimeria maxima*, *Entamoeba histolytica*, *Giardia duodenalis*, *Blastocystis hominis*,  
1285 *Plasmodium falciparum*, *Toxoplasma gondii*, *Salmonella* spp., *Escherichia coli*, and  
1286 *Trypanosoma cruzi* (Durigan et al. 2020). The purification method was used on 6 samples from  
1287 open water sources in Maryland, and PCR-based detection targeting 18S rDNA using a  
1288 modified FDA's BAM, chapter 19B (REF) method. In 3/6 samples, amplicons were detected (Ct

1289 values ranging between 33 and 36, vs Ct values from 27 to 31 for stool samples from patients  
1290 that were used as positive controls). However, amplicons resulting from environmental samples  
1291 were not sequenced, with questions about specificity of detection (in light of studies of Mattioli  
1292 and Ortega (REFs)) remaining unresolved.

1293 Alternative to the BAM qPCRs, a nested PCR assay targeting the 18S rRNA gene has recently  
1294 been described for the detection of *C. cayetanensis* oocysts in fresh berries and soil from berry  
1295 farms in Mexico (Resendiz-Nava et al. 2020). The primer sets used for the nested PCR reaction  
1296 were the same as used in the BAM qPCR method for fresh produce. Sensitivity of the nested  
1297 PCR (established only with blueberries) was as few as 50 oocysts per 50 g berry sample, and  
1298 Sanger sequencing and phylogenetic analysis was used on the amplicon from the second PCR  
1299 to confirm the presence of *C. cayetanensis*. To further promote sensitivity, bovine serum  
1300 albumin was added to the PCR reactions to offset potential inhibitory substances commonly  
1301 present in environmental samples (Resendiz-Nava et al. 2020). When evaluated by the nested  
1302 PCR assay, 16.6% (1/6), 36.4% (4/11) and 20.0% (1/5) of blueberry, blackberry, and farm soil  
1303 samples, respectively, tested positive for *C. cayetanensis* and Sanger sequencing of the nested  
1304 amplicons matched database sequences of *C. cayetanensis* (Resendiz-Nava et al. 2020).  
1305 Although nested PCRs may allow for sensitive detection, the transfer of amplicon from the first  
1306 PCR reaction to the second PCR introduces additional opportunity for cross contamination  
1307 within the laboratory.

1308 Targeting the 18S rRNA gene for qPCR detection of *C. cayetanensis* has several advantages  
1309 and challenges. The 18S rRNA gene is conserved among the coccidian group and *C.*  
1310 *cayetanensis* has been previously estimated to contain 18 copies per genome (Murphy et al.  
1311 2018). Considering that a sporulated *C. cayetanensis* oocyst in the environment would contain  
1312 four genomes, targeting the numerous copies of the 18S rRNA gene allows more sensitive  
1313 detection than targeting a single-copy gene. However, given the conserved nature of the 18S  
1314 rRNA gene among coccidia/Apicomplexa, even slight modifications to the qPCR described in  
1315 the FDA BAM methods for fresh produce and agricultural waters may negatively affect the  
1316 assay's specificity. For example, one study demonstrated that some modifications to the qPCR  
1317 master mix from that described in the FDA BAM method for the detection of *C. cayetanensis* on  
1318 fresh produce resulted in cross-reactivity with several *Eimeria* spp. and *Isospora suis*, whereas  
1319 strict adherence to the method verified specificity on various types of produce (Lalonde et al.  
1320 2022). This highlights the importance of conducting robust validation of any modifications to the  
1321 FDA BAM methods for the detection of *C. cayetanensis* before attempting to use the modified  
1322 method for evaluating food or environmental samples.

1323

#### 1324 *PCR methods targeting the mitochondrial genome*

1325 Recently described methods for detecting *C. cayetanensis* in fresh produce and agricultural  
1326 water have included PCR assays targeting the *C. cayetanensis* oxidase gene (*Cox3*; a multi-  
1327 copy gene) located within the mitochondrial genome. Two such methods are available on the  
1328 FDA's website as "Other Analytical Methods of Interest to the Foods Program" (FDA 2023b).  
1329 These two methods are virtually identical to the FDA BAM methods for the detection of *C.*

1330 *cayetanensis* in fresh produce and agricultural water except the qPCR assay targeting the 18S  
1331 rRNA gene in the BAM methods has been replaced with the Mit1C qPCR assay (which also  
1332 includes an IAC). As such, the Mit1C qPCR is positioned as a stand-alone detection assay to be  
1333 used as an alternative to the current BAM qPCR. The target for the Mit1C assay (a 205 bp  
1334 region) was identified *in silico* using BLAST searches against available sequences of *C.*  
1335 *cayetanensis* and other genera/species (e.g., *Eimeria* spp. and *Isospora* spp.) in the  
1336 Apicomplexa phylum (Shiple, Arida and Almeria 2022). The Mit1C qPCR assay was validated  
1337 in a single-laboratory study to detect as few as 5 *C. cayetanensis* oocysts in 25 g samples of  
1338 cilantro or romaine lettuce, and 50 g samples of raspberries (Balan et al. 2023). In the study, the  
1339 Mit1C qPCR demonstrated specific amplification when used to evaluate cilantro and romaine  
1340 lettuce samples spiked with oocysts of two *Eimeria* spp. (*E. acervulina* and *E. tenella*) alone or  
1341 at a 2:1 ratio with *C. cayetanensis* oocysts (Balan et al. 2023). However, the genetic diversity of  
1342 food and environmental samples extends beyond the mitochondrial genome sequence data  
1343 currently available and the scope of this study, therefore further evaluation of Mit1C qPCR  
1344 specificity is needed.

1345 A flotation concentration method using saturated sucrose solution followed by the FDA BAM  
1346 qPCR assay (targeting the 18S rRNA gene) was recently investigated for isolation and detection  
1347 of silt loam soil samples inoculated with *C. cayetanensis* oocysts (Shiple et al. 2022).  
1348 Additionally, this study compared the flotation method to three commercial DNA isolation kits  
1349 and compared detection using the Mit1C qPCR with the BAM qPCR. The flotation method  
1350 resulted in greater sensitivity of detection than the three commercial DNA isolation kits, and the  
1351 method was reported capable of detecting 10 oocysts in 10 g of soil (Shiple et al. 2022). The  
1352 Mit1C qPCR was only evaluated at the 100 oocysts per 10 g soil inoculation level, however  
1353 when compared to the BAM qPCR the Mit1C qPCR achieved detection at lower Ct values  
1354 indicating better detection (Shiple et al. 2022). In the study, all inoculated samples evaluated  
1355 by the Mit1C assay tested positive and all negative control (uninoculated) samples tested  
1356 negative.

1357 Detecting parasites from various types of soil samples has historically been difficult, therefore  
1358 further studies using the flotation concentration method followed by either the BAM qPCR or the  
1359 Mit1C qPCR for the detection of *C. cayetanensis* oocysts in samples of silt loam soil, sandy clay  
1360 loam soil, and a commercial potting mix were performed (Arida, Shiple and Almeria 2023).  
1361 Similar to the previous study, both qPCRs provided specific detection of as few as 10 oocysts  
1362 per 10 g sample (both silt loam and sandy clay loam soils) with the Mit1C qPCR achieving  
1363 detection in a higher (but not statistically significant) number of samples but at a significantly  
1364 lower Ct value (reported as Cq) (Arida et al. 2023). Modification to the flotation method was  
1365 required to optimize recovery and detection of *C. cayetanensis* oocysts from the potting mix with  
1366 both the BAM qPCR and Mit1C qPCR detecting as few as 20 oocysts in 5 g samples. It should  
1367 be noted that the unseeded (negative control) sample of potting mix returned an “undetermined”  
1368 result by the Mit1C qPCR assay. Amplicons from the Mit1C qPCR on soil samples inoculated  
1369 with 100 oocysts were successfully sequenced to confirm alignment with *C. cayetanensis*,  
1370 however such attempts at sequencing amplicons from the samples inoculated at 20 and 10  
1371 oocysts were unsuccessful (Arida et al. 2023).

1372 Additionally, a conventional PCR (Mit3PCR) has also been recently described for the detection  
1373 of *C. cayetanensis* in food and water samples that targets a 182-bp fragment of the *Cox3* gene  
1374 (the same mitochondrial target as the Mit1C qPCR assay) (Durigan et al. 2022). Mit3PCR was  
1375 proposed to be used complementary to the FDA BAM methods to confirm BAM qPCR-positive  
1376 samples, with any amplicon bands generated by the Mit3PCR subsequently analyzed by DNA  
1377 sequencing (Durigan et al. 2022). The sensitivity of the mit3PCR method was confirmed to be  
1378 equivalent to that of both FDA BAM qPCR methods (unpublished data from a single laboratory  
1379 validation performed by FDA in 2018). The specificity of mit3PCR was evaluated using a panel  
1380 of DNA samples from selected foodborne bacterial and parasitic pathogens: *Cryptosporidium*  
1381 *parvum*, *Cryptosporidium hominis*, *Cyclospora papionis*, *Eimeria acervulina*, *Eimeria*  
1382 *tenella*, *Eimeria maxima*, *Entamoeba histolytica*, *Giardia duodenalis*, *Blastocystis*  
1383 *hominis*, *Plasmodium falciparum*, *Neospora caninum*, *Toxoplasma gondii*, *Salmonella*  
1384 *spp.*, *Escherichia coli*, and *Trypanosoma cruzi*. No cross reactivity with this DNA panel was  
1385 observed. In addition, the specificity of the 182-bp region amplified by the mit3PCR was also  
1386 confirmed by sequence comparison with other Eimeriidae species. Therefore, the sequences of  
1387 any amplicons generated due to cross-reaction with background taxa in mixed samples could  
1388 be used to resolve the specificity by comparison with a database of mitochondria genomes  
1389 (Durigan et al. 2022). However as noted previously, the genetic diversity of environmental  
1390 samples extends beyond this limited DNA panel as well as the mitochondrial genome sequence  
1391 data currently available.

1392

1393 *Future method development and evaluation for the detection of C. cayetanensis in food and*  
1394 *environmental samples*

1395 The close genetic relatedness of *C. cayetanensis* with other coccidia/Apicomplexa, such as  
1396 other *Cyclospora* spp. and *Eimeria* spp., and the limited genomic sequences of coccidia  
1397 currently available have clearly complicated the development of DNA/RNA-based detection  
1398 methods with the desired degree of specificity and robustness for widespread laboratory use.  
1399 For these reasons, the specificity of genetic targets for detecting *C. cayetanensis* that are  
1400 identified in silico should be evaluated using a robust exclusivity panel of DNA from closely  
1401 related coccidia as well as a wide range of food and environmental samples. As discussed in  
1402 sections above, the current BAM qPCR methods require strict adherence to the defined PCR  
1403 conditions/procedures for specific detection of *C. cayetanensis*. Any modifications to PCR  
1404 conditions/procedures in established official methods should be thoroughly evaluated to  
1405 determine if the modification(s) negatively affected specificity before the method is further  
1406 developed by the addition of steps to confirm and/or genetically characterize PCR-positive  
1407 samples. Continued research to identify additional genetic targets for specific detection of *C.*  
1408 *cayetanensis* in food and environmental samples should be continued as well as the  
1409 development of detection methodology that is more tolerant to minor modifications without  
1410 sacrificing specificity.

1411 Future method development for the detection of *C. cayetanensis* in food and environmental  
1412 samples should include the evaluation of multiple genetic targets representing different regions  
1413 of the genome. However, secondary genetic targets to confirm initial PCR-positive samples

1414 should also be specific for *C. cayetanensis* to avoid amplification bias when testing complex  
1415 samples expected to contain a diverse population of coccidia/apicomplexan protozoa, such as  
1416 food and environmental samples. DNA sequencing analysis (e.g., NGS or Sanger sequencing)  
1417 of one or more amplicons should be considered for further confirmation of the presence of *C.*  
1418 *cayetanensis* and/or characterization at the species or haplotype/genotype levels (Durigan et al.  
1419 2020, Kahler et al. 2021, Lalonde et al. 2022). However, amplicon sequencing is unlikely to be  
1420 a useful method when a required management decision needs to be done quickly (i.e., whether  
1421 or not to harvest a field within the next 3-5 days).

1422 At the time of this Committee report, the International Standards Organization (ISO) has  
1423 approved a project proposal within TC34/SC9 to develop an international standard for detection  
1424 of *C. cayetanensis* in fresh leafy green vegetables and berry fruits, with possible application to  
1425 other fresh produce (ISO 2023). Although the approved ISO proposal does not include the  
1426 determination of *C. cayetanensis* to the genotype or haplotype level, the development of this  
1427 international standard should consider the recommendations of this report for future method  
1428 development, specifically the inclusion of multiple genetic targets representing different regions  
1429 of the genome and the use of DNA sequencing of secondary target amplicons to further confirm  
1430 the presence of *C. cayetanensis*.

1431

#### 1432 **Q8: Viability of oocysts**

##### 1433 **What information exists on assessing viability of oocysts?**

1434 The viability of recovered oocysts is needed to assess the public health risks of foodborne  
1435 transmission. Currently, the viability of Cyclospora oocysts can only be assessed by analysis of  
1436 the sporulation rates of the oocysts (Almeria et al. 2019). The sporulation viability of oocysts  
1437 refers to the ability of the oocysts to undergo sporulation, which is the process of forming  
1438 sporozoites, the infective stage of the parasite. Sporulation was often used as an indicator of  
1439 viability of *C. cayetanensis* oocysts. Assessing the sporulation viability provides information on  
1440 the ability of the oocysts to develop into the infectious form.

1441 Compared with the development of detection techniques for Cyclospora, the assessment of  
1442 viability of Cyclospora oocysts was much slower. One of the barriers for the assessment of  
1443 viability of oocyst was that the sporulation of Cyclospora takes much longer than other  
1444 protozoan parasites, with an incubation of 7 to 12 days at 25 to 30°C.

1445 Microscopy-based technique was used to assess the sporulation viability of oocysts of  
1446 Cyclospora (reference). Some other methods, like vital dye assays (e.g., DAPI) (Almeria et al.  
1447 2019) and Electrorotation method (Dalton et al. 2001), which was either not commercially  
1448 available or still at the research stage (Almeria et al. 2019).

1449 Some molecular methods such as PCR (polymerase chain reaction) or qPCR (quantitative  
1450 PCR) were useful to detect oocysts and to investigate the source of contamination. In the past,  
1451 those methods cannot be used to verify viability of oocysts. A recent study by Tucker and  
1452 colleagues (Tucker et al. 2021) reported that genes differentially expressed in *E. acervulina*  
1453 during sporulation, in mature and immature oocysts were identified and their homologs were

1454 detected in *C. cayetanensis*. It is reasonable to hypothesize that these could be useful targets  
1455 for mRNA-based assays for viability of the propagules.

1456 Another promising development of assessment of viability of *Cyclospora* oocysts was to use  
1457 artificial intelligence and machine learning to speed detection of *Cyclospora cayetanensis*'  
1458 infectious life stage. Researchers are using a library of images of viable and nonviable oocysts  
1459 to "teach" a machine to make the differentiation by robotic microscopy and image analysis  
1460 (reference).

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## Control Strategies and Surrogates

1466 **Q5: Current monitoring and management strategies**

1467 **Is monitoring for *Cyclospora cayetanensis* by testing food products, agricultural**  
1468 **environment and agricultural inputs being applied as a management strategy currently**  
1469 **(e.g., by industry, government)?**

1470 **a) Are there best practices for monitoring the presence of *Cyclospora cayetanensis***  
1471 **in agricultural production (including matrices [e.g., water, product], frequency,**  
1472 **timing of sample collection (pre- vs. post-harvest), and sample numbers)?**

1473 **b) Has monitoring led to development and implementation of effective preventive**  
1474 **measures? If so, how effective have they been?**

1475 Summary response. Currently, widespread environmental monitoring of agricultural  
1476 environments and agricultural inputs, even in endemic areas, is not routinely conducted. The  
1477 challenge, with environmental monitoring, lies in the low prevalence of in the environment and  
1478 low recovery rate for oocysts and unreliable detection of *C. cayetanensis* DNA with current  
1479 testing methodologies. The limiting factor for environmental monitoring is the lack of  
1480 commercially available rapid test kits, that are low cost and can detect very low oocysts  
1481 concentrations. In the interim, emphasis should be on, and enforcing, improved worker hygiene  
1482 and sanitary practices, to include toileting habits, and routine testing of irrigation water supplies  
1483 for human fecal contamination at the farm and packing facilities.

1484

1485 Q5 a) In regions where *C. cayetanensis* is endemic, a more comprehensive set of best practices  
1486 could be put in place to monitor for *C. cayetanensis* in the production environment (CODEX ref).  
1487 We recognize that even in the areas where *C. cayetanensis* is endemic, in the small number of  
1488 studies that have been done so far, amplicons resulting from PCR reactions aimed at detecting  
1489 18S rDNA from *C. cayetanensis* were detected in only 1-4% of locally grown produce (Barlaam  
1490 et al., 2021, Caradonna et al., 2017, Giangaspero et al., 2015, Ortega et al., 1997, Sim et al.,  
1491 2017). 18s rDNA amplicons were detected by Resendiz-Nava et al in 20% of soil samples from  
1492 Mexican farms; and by Giangaspero in 12% soil samples and 6 to 21% of well and municipal  
1493 treated water. (Resendiz-Nava et al 2020, Giangaspero et al 2015). Resendiz-Nava et al  
1494 confirmed the presence of *C. cayetanensis* using Sanger sequencing and phylogenetic analysis,  
1495 comparing the amplicons with 18S rRNA genes from GenBank archived *C. cayetanensis*

1496 genome sequences. Giangaspero et al used single-strand conformation polymorphism and the  
1497 BLAST tool to compare amplicons against known reference sequences.

1498  
1499 Given the low level of prevalence in food samples even in the areas where *C. cayetanensis* is  
1500 endemic, risk-based sampling would be advisable. The Code of Hygienic Practice for Fresh  
1501 Fruits and Vegetables, Codex Alimentarius CXC 53-2003, provides guidance in accordance with  
1502 Good Agricultural Practices and Good Hygienic Practices to control hazards, beginning with  
1503 primary production at the farm. *C. cayetanensis* is listed among the microbiological pathogens  
1504 of concern. Risk-based and risk-appropriate testing of agricultural water may be advisable,  
1505 however, this Committee is not convinced that testing specifically for *C. cayetanensis* using  
1506 existing methodologies and abundance of closely related organisms that are not pathogenic to  
1507 humans is more practical than the risk-based tests for the presence of human fecal pollution.  
1508 Growers should consider testing irrigation water for microbial and chemical contamination for  
1509 identified risks, at a frequency determined by water source, with the consideration risk of  
1510 environmental contamination, such as flooding, the type of irrigation or application method, and  
1511 the use of manure, biosolids, and natural fertilizers.

1512  
1513 Growing operations should consider evaluating hazards posed by the agricultural workers who  
1514 may be symptomatic or asymptomatic carriers and consider medical examinations as  
1515 appropriate. Agricultural workers should be encouraged to report diarrheal diseases and  
1516 incentivized to seek treatment. Growing operations should emphasize and reinforce, training in  
1517 health, hygiene, and sanitation. Adequate number of functional sanitary toileting facilities and  
1518 handwashing stations close to work areas in the growing fields and packinghouses should be  
1519 available. (Codex Alimentarius, CXC 53-2003) Codex Alimentarius Guidelines CAC/GL 88-2016  
1520 provides guidelines to control food-borne parasites, although *C. cayetanensis* is not specifically  
1521 mentioned by name. (Reference is Guidelines on the Application of General Principles of Food  
1522 Hygiene to the Control of Foodborne Parasites, CAC/GL 88-2016, Codex Alimentarius  
1523 International Food Standards, Food and Agricultural Organization of the United Nations and  
1524 World Health Organization, Adopted 2016).

1525  
1526 However, in the areas where *C. cayetanensis* is not endemic (such as production areas in the  
1527 continental U.S.), proposed sampling and preventative measures must recognize extremely low  
1528 detection rates in environmental and food samples. Therefore, environmental testing  
1529 programs must take into consideration that humans are the only documented vector for *C.*  
1530 *cayetanensis*, and contamination with human waste or sewage is the likeliest source of the  
1531 parasite in the production or processing environment. If testing of the final product is  
1532 considered, a testing method needs to be developed to address the following criteria:

- 1533 • Reliable and cost-effective detection of *C. cayetanensis* in samples in the presence of  
1534 closely related organisms that are not pathogenic to humans
- 1535 • Quick laboratory turn-around time to recognize the fact that commodities previously  
1536 linked to the outbreaks of illness are highly perishable, and final product testing is  
1537 typically done on the already harvested commodities
- 1538 • Ideally, tests should be sufficiently sensitive to allow for a single-step detection, with only  
1539 an occasional need for a second step validation of rare positives.

- 1540
- 1541
- 1542
- 1543
- 1544
- 1545
- 1546
- 1547
- 1548
- 1549
- Given the low prevalence of *C. cayetanensis* in domestic environmental samples and the final product, a method for detecting small numbers of oocysts from large volumes of wash water, for example, needs to be developed.
  - When sampling and testing are done for root cause analysis, an appropriate number of samples from a diversity of sites, such as water source, irrigation water, farm soil, and field portable toilet facilities should be considered.
  - Given the low prevalence of *C. cayetanensis* in areas where it is not endemic, a negative result from a routine test for *C. cayetanensis* does not conclusively establish absence as the number of oocysts may be below current detection levels. Therefore, testing should include indicators of human fecal pollution.

1550

1551 **b. Has monitoring led to development and implementation of effective preventive**  
1552 **measures? If so, how effective have they been?**

1553 There is little published information regarding monitoring programs. In 2017, the  
1554 Canadian Food Inspection Agency implemented a national routine surveillance for *C.*  
1555 *cayetanensis*, using the BAM Chapter 19b method, in imported and domestic fresh leafy greens,  
1556 herbs, and berries (Chacin-Bonilla and Santin 2023). The Canadian Centre for Foodborne and  
1557 Animal Parasitology detected *C. cayetanensis* in 0.28% of the survey samples. Chacin-Bonilla  
1558 and Santin, reiterated the recommendations in Codex Alimentarius CXC 53-2003, where the  
1559 focus should be on agricultural worker hygiene and sanitary practices. Resendiz-Nava et al  
1560 (2020) recommend monitoring at the farm and packing facilities. The issue with monitoring at  
1561 the farm and packing facilities remains the low prevalence of *C. cayetanensis* in the  
1562 environment and low recovery rate for oocysts and detection of *C. cayetanensis* DNA with  
1563 current testing methodologies.

1564

1565 **Q9: Preventive measures**

1566 **What preventive measures exist for the control of *Cyclospora cayetanensis* (e.g., using**  
1567 **filtration)?**

1568 **a. How effective have they been?**

1569 **b. What are the impediments to development of effective preventive measures for *C.***  
1570 ***cayetanensis* and how can they be overcome?**

1571 Measures to control or eliminate *C. cayetanensis* in food products have generally not been  
1572 identified (Erickson and Ortega 2006, Kniel et al. 2007, Erickson and Ortega 2006, Ortega and  
1573 Sanchez 2010). The resilient nature of the oocyst bilayer cell wall structure and its larger size  
1574 (7.5-10µm) could make filtration a practical and promising approach to eliminating the risk from  
1575 an environment assuming that filtration rates and useful life of filters meet the throughput  
1576 requirements. To date, no filtration systems have been constructed to eliminate *C.*  
1577 *cayetanensis* while also providing the speed and filtering capacity needed to eliminate the  
1578 oocyst in high-volume and high-speed production systems (Erickson and Ortega 2006, Kniel  
1579 2020). Given the challenges of filtration, other treatments for food systems, water, and irrigation  
1580 systems have been studied (Erickson and Ortega 2006, Kniel et al. 2007, Erickson and Ortega  
1581 2006). The oocysts' sporulation ability has been evaluated by treating them with chemicals  
1582 common in food processing such as chlorine, peracetic acid, and chlorine dioxide; the resilient  
1583 oocyst cell walls have proven mostly resistant to such treatments (Ortega et al. 2008, Ortega

1584 and Sanchez 2010, Ortega et al. 2008, Malka and Park 2021, Praeger, Herppich and  
1585 Hassenberg 2018). Post-harvest treatments and processing conditions of temperature  
1586 (high/low), UV, ozone, high-pressure processing (HPP) have all been evaluated to eliminate the  
1587 risk for consumers; most treatments have been unsuccessful, impractical, or only evaluated on  
1588 surrogate organisms with unknown understanding of how *C. cayetanensis* oocysts may react  
1589 (Kniel et al. 2007, Ortega and Sanchez 2010, Guo, Huang and Chen 2019, Kniel et al. 2007,  
1590 Erickson and Ortega 2006, Kniel et al. 2007). Extreme temperatures (60°C for 1 h or 70°C for  
1591 15 min, 100°C or -70°C temperature treatment) were found to be successful to inhibit  
1592 sporulation; however, these temperatures are not practical for the foods often associated with  
1593 risk; fresh produce, berries, herbs, etc. (Erickson and Ortega 2006, Kniel et al. 2007, Almeria et  
1594 al. 2019, Ortega and Sanchez 2010). On-going research on *C. cayetanensis* oocysts with more  
1595 novel treatment options is needed to identify effective and functional treatment options for the  
1596 food industry (Kniel 2020, Erickson and Ortega 2006, Malka and Park 2022).

1597  
1598 **Preventative Measures.** Potential means to prevent future illness from *C. cayetanensis* are to  
1599 physically remove oocysts that may be found in food, water, and agricultural production  
1600 environments, and/or to render *Cyclospora* oocysts that may be present in a food or production  
1601 environment non-infectious (Erickson and Ortega 2006). The spherical *Cyclospora* oocyst  
1602 bilayer cell wall serves as a strong protective barrier minimizing susceptibility to challenging  
1603 environmental conditions and common antimicrobial treatments (Kniel et al. 2007). The physical  
1604 structure of the *Cyclospora* oocyst is highly resistant to degradation in the environment from  
1605 heat, sunlight, cold, and other environmental pressures (Erickson and Ortega 2006). The  
1606 characteristics that allow for environmental survival also render them challenging to eliminate  
1607 with mitigations in the food industry (Kniel et al. 2007, Erickson and Ortega 2006). Previous  
1608 research has relied upon using oocyst sporulation as an indication of whether oocysts remain  
1609 infectious post treatment or surrogate experiments with related parasites since no effective in  
1610 vitro or in vivo methods have been discovered to be able to test infectivity directly (Ortega and  
1611 Sanchez 2010). Below are brief summaries of preventative measures and treatments that have  
1612 been explored for efficacy against consumer exposure from *C. cayetanensis* within the food  
1613 system.

1614 Fresh produce represents a high percentage of foods associated with past *Cyclospora*  
1615 outbreaks; numerous events attributed to processed salads, berries and herbs (Temesgen et al.  
1616 2021). Products consumed fresh represent a challenge for food safety due to the limited number  
1617 of approaches available to control microbial risk while maintaining the attributes demanded by  
1618 the consumer (e.g., freshness, texture, color) (Kniel et al. 2007). In addition to the lack of many  
1619 mitigation methods for fresh produce, managing parasite risk is further complicated in that many  
1620 foodborne parasites such as *Giardia*, *Cryptosporidium* and *Cyclospora* oocysts have been  
1621 observed to harbor physical structures that facilitate adherence to surfaces; consequently,  
1622 physical removal from food surfaces is difficult (Temesgen et al. 2021).

1623  
1624 **Filtration.** Filtration relies upon the physical removal of oocysts from a sample or environment  
1625 as opposed to rendering the oocyst noninfectious; it is an approach reliant on elimination either  
1626 from water wash systems that may be in a production environment, or from water distribution  
1627 and irrigation systems used for crop production. *Cyclospora* oocysts' size (7.5-10µm) make

1628 them a more favorable candidate for physical separation methods than bacteria and viruses  
1629 which are smaller and subsequently more difficult to physically remove from an environment or  
1630 process (Erickson and Ortega 2006). A 2020 study using *Cryptosporidium parvum* (4.5µm  
1631 oocysts) and *Eimeria tenella* (19-22µm) as surrogates for *C. cayetanensis* found success in  
1632 removing oocysts from contaminated pond water using sand and also studied zero-valent iron  
1633 (ZVI) filtration for combined physical removal and oocyst inactivation (Kniel 2020). Sand filtration  
1634 physically captures oocysts, while using ZVI in combination with sand filtration is intended to  
1635 impact oocyst viability. *Cryptosporidium parvum* in this study represented a parasite closer in  
1636 size to *C. cayetanensis* (7.5-10µm), observed a 4.3 log reduction using a ZVI sand column  
1637 versus sand only (Kniel 2020). *Eimeria tenella*, a much larger oocyst, obtained a 6-log reduction  
1638 for the combined ZVI sand column, and only a 2.3 log reduction by sand alone (Kniel 2020, CPS  
1639 Ref). Filtration remains a promising approach to control *Cyclospora cayetanensis* within water  
1640 systems; however more research is needed to identify systems to effectively remove oocysts  
1641 while also accommodating the volume of water needed in industrial wash and irrigation  
1642 networks.

1643  
1644 **Washing.** While industry and produce consumers have long relied on washing to clean produce  
1645 items prior to consumption, these treatments have historically been utilized to remove soil,  
1646 insects, and other substances prior to consumption, but were not designed for the removal of  
1647 microbial risks. Research on produce wash systems has shown that microorganism removal  
1648 efficacy can vary immensely based on matrix, target organism(s), and whether a combination of  
1649 washing (physical application) with other treatments such as chlorination, chemical treatment,  
1650 ozone, etc. are applied) (Temesgen et al. 2021). In 2021, researchers studied the potential of  
1651 three consumer wash systems (running water, 1.75% acetic acid solution, washing followed by  
1652 a salad spinner) applied to fresh blueberries and raspberries inoculated with *C. parvum*, *C.*  
1653 *cayetanensis*, *G. duodenalis* oocysts to better understand if washing just prior to consumption  
1654 would be sufficient to remove foodborne parasite risk (Temesgen et al. 2021). Results indicated  
1655 that 80% of the *C. parvum* and *G. duodenalis* oocysts were removed by each of the washing  
1656 methods on either berry matrix; raspberries being more difficult to remove oocysts than  
1657 blueberries. *C. cayetanensis* across all treatments was found to remain on the berries to a  
1658 much greater percent than the other parasites studied (Temesgen et al. 2021). *Cyclospora*'s  
1659 greater adherence led the researchers to hypothesize that the adherence may be related to the  
1660 specific adhesions found within this organism's oocyst cell structure that are unique compared  
1661 to the other parasites studied (Temesgen et al. 2021). Industrial wash systems have not yet  
1662 been studied in respect to *C. cayetanensis* and is an area requiring further research.

1663  
1664 **Chemical Sanitizers (chlorine/peracetic).** Fresh produce industry relies on chemical  
1665 sanitizers to prevent cross-contamination of the product during post-harvest processing.  
1666 Chlorine is one of the most common and universally effective sanitizers used in the food and  
1667 agriculture industries (Erickson and Ortega 2006, Malka and Park 2022), Suslow, Trevor. 1997).  
1668 Unlike bacteria and viruses which are susceptible to destruction following chlorine treatment,  
1669 *Cyclospora* oocysts have not been shown to be susceptible to common chlorine treatments  
1670 used for disinfection and sanitization within the food industry (Erickson and Ortega 2006, Malka  
1671 and Park 2022).

1672  
1673 **Chlorine Dioxide.** Chlorine dioxide (ClO<sub>2</sub>) in gaseous and aqueous forms has been found to be  
1674 a useful tool in the food and fresh produce industry due to its bactericidal effects on bacterial  
1675 foodborne pathogens, its efficacy over a wider range of pH values (pH 3-8) than other  
1676 disinfectant systems, and unlike other chlorine-based sanitizers it does not create dangerous  
1677 halogenated byproducts ((Ortega et al. 2008, Malka and Park 2021, Praeger, Herppich and  
1678 Hassenberg 2018), FDA. 2008). However, oocysts of *C. cayetanensis* artificially inoculated  
1679 onto basil and lettuce were able to withstand the exposure to gaseous chlorine dioxide at 4.1  
1680 mg/liter for 20 min without losing the ability to sporulate (Ortega et al. 2008, Ortega and  
1681 Sanchez 2010) .  
1682

1683 **Temperature.** Cyclospora oocysts treated in the laboratory with high temperatures, 60°C for 1 h  
1684 or 70°C for 15 min, 100°C were found to no longer be capable of sporulation (Erickson and  
1685 Ortega 2006, Almeria et al. 2019). In one study, researchers observed that a slight reduction in  
1686 temperature to 50°C for 1 hour-maintained *C. cayetanensis* sporulation abilities (Erickson and  
1687 Ortega 2006). Application of high temperature could be a means of inactivation for oocysts;  
1688 however, such treatments would not be practical for fresh produce treatments as item quality  
1689 would degrade and no longer meet market expectations (Kniel et al. 2007).  
1690

1691 Past cyclosporiasis outbreaks have been associated with consumption of foods that  
1692 have been stored refrigerated and frozen, providing an indication that freezing and cold  
1693 temperatures alone may not be sufficient to inactivate *Cyclospora* oocysts (Ortega and Sanchez  
1694 2010). Experimentally, *Cyclospora* oocysts remain capable of sporulation following -15°C  
1695 treatment for 24 hours in dairy matrices, and -20°C for 48 hours on basil and for 4 days in -20°C  
1696 water samples (Ortega and Sanchez 2010, Almeria et al. 2019). In one study, -70°C  
1697 temperature treatment of basil and water samples inoculated with *Cyclospora* oocysts was also  
1698 found to be successful in prohibiting oocyst sporulation (Ortega and Sanchez, 2010). These  
1699 extreme temperatures would not be practical with current industry practices, nor product  
1700 expectations for consumers. While no studies were found that specifically researched  
1701 refrigeration temperatures consistent with cold-chain and consumer storage, one reference  
1702 noted that *Cyclospora* oocysts stored at 4°C for one or two months were capable of sporulating  
1703 following a 30°C exposure for 6-7 days (Almeria et al. 2019).  
1704

1705 **UV.** Ultraviolet (UV) light consists of short wavelengths of light (250-270nm) that has been used  
1706 for its antimicrobial properties on bacteria, viruses, yeasts, molds and parasites in a variety of  
1707 food, water and produce matrices ((Guo, Huang and Chen 2019, Kniel et al. 2007). While direct  
1708 exploration of *Cyclospora* has not been completed, UV treatment of a closely related bird  
1709 parasite *Eimeria acervulina* yielded variable outcomes that were dependent on the UV exposure  
1710 and the inoculum level of oocysts (Kniel et al. 2007).  
1711

1712 **Ozone.** No published research to date has been completed to *C. cayetanensis* response  
1713 following ozone exposure and further research is needed to determine if ozone would be  
1714 effective on preventing sporulation, however in prior laboratory studies ozone treatments were

1715 effective against *Giardia lamblia* and *Cryptosporidium parvum* (Erickson and Ortega 2006).  
1716 (Include Khalifa REF from Q17)

1717  
1718 High pressure processing (HPP). HPP treatment with 550 MPa at 40°C for 2 minutes was  
1719 found effective to inactivate oocysts on fresh basil and raspberries inoculated with *Eimeria*  
1720 *acervulina*, a potential *Cyclospora* surrogate (Kniel et al. 2007). Findings on surrogates are  
1721 suggestive that HPP may be effective at rendering *Cyclospora* oocysts nonviable on food  
1722 matrices where HPP is a potential application.

1723  
1724 **Future needs.** As evident from the studies and treatments referenced in the preceding  
1725 sections, direct research for *C. cayetanensis* is limited, and many conclusions and hypotheses  
1726 on efficacy of treatments for *Cyclospora* have been drawn from studies completed on related  
1727 parasites and surrogates. Major impediments for identifying or developing preventative  
1728 measures against *Cyclospora* include the limited availability of *Cyclospora* oocysts for  
1729 researchers, the inability to culture oocysts in the laboratory, and lack of consensus on the most  
1730 appropriate surrogates for this organism. When considering the collection of studies and  
1731 approaches that have been completed regarding preventative measures against *Cyclospora*,  
1732 few studies have yet to identify commercially viable measures against this parasite for the food  
1733 and produce industry. Of the studies that identified promising measures (e.g., 70-100°C, HPP,  
1734 filtration) most would not be practical within the produce industry's supply chain. Given the  
1735 percentage of cyclosporiasis outbreaks associated with fresh produce items, the lack of  
1736 identified treatments amenable for fresh produce is problematic and warrants further  
1737 exploration. Future research is needed to better understand the organism and ultimately help  
1738 identify measures to reduce consumer risk from this organism. For this research to be  
1739 successful, solutions must first be found regarding *C. cayetanensis* oocysts availability and/or  
1740 identifying the most appropriate surrogates for this organism.

1741  
1742 **Q12: Possible surrogates**

1743 **What other coccidian parasites could serve as a surrogate research model**  
1744 **for *Cyclospora cayetanensis* behavior (e.g., for evaluation of control measures)?**

1745 Three other Apicomplexan parasites have been proposed as surrogates for *C. cayetanensis*:  
1746 *Eimeria*, *Toxoplasma* and *Cryptosporidium*. *Eimeria* is probably the best surrogate because of  
1747 its taxonomic closeness, the existence of an animal model and the extensive molecular tools  
1748 available. *T. gondii* has also been widely characterized, but safety issues for lab workers, the  
1749 public concern for use of cats for research, taxonomically farther and different life cycles limit  
1750 their equivalence. *C. parvum* has less similarities to be considered a representative surrogate of  
1751 *C. cayetanensis*.

1752  
1753 Several publications have provided a set of criteria to guide researchers in the selection of  
1754 surrogate organisms. Busta et al (2003) distinguished between indicator and surrogate  
1755 organisms, defining the latter as a unique tool that is specifically utilized to evaluate the effects  
1756 and responses of a target organism to selected processing treatments. A list of twelve ideal  
1757 traits for potential surrogate microorganisms was outlined in the same publication. Those  
1758 included:

1759  
1760 Nonpathogenic Inactivation characteristics and kinetics useful to predict those of the target  
1761 organism. Similar responses to pH, temperature and oxygen as the to the target  
1762 microorganisms when exposed to raw fruit and vegetable. Growth characteristics that are  
1763 consistent and stable Cultivated easily to obtain relatively high-count populations Inoculum  
1764 population changes very little from preparation to utilization. Easily quantified using rapid,  
1765 sensitive, inexpensive detection systems Easily differentiated from other microorganisms.  
1766 Similar attachment characteristics to those of the target microorganisms. Genetically stable so  
1767 results can be reproducible, by multiple laboratories. Does not have persistence characteristics  
1768 to become a spoilage organism in the environment or products where it is applied. Susceptibility  
1769 to injury similar to that of target pathogen.

1770  
1771 Harris et al. (Harris et al. 2012) and Harris et al. (Harris et al. 2013) provided similar  
1772 recommendations to the use of surrogates for agricultural water and un-treated soil  
1773 amendments of animal origin to be used in fresh produce fields. These included: “(i) similar  
1774 characteristics to those of the pathogen of concern such as growth, inactivation kinetics,  
1775 attachment capacity, susceptibility to sublethal stress injury, and resuscitation; (ii) inducible  
1776 stress tolerance resistance traits (pH, heat, desiccation, osmotic pressure, etc.); (iii) ease of  
1777 detection; and (iv) differential or unique phenotypic and/or genotypic traits from background  
1778 isolates” (Harris et al. 2012). The latter reference also included a compilation of surrogate  
1779 microorganisms reported in the literature, but none of these included parasite surrogates. It  
1780 should be noted that among bacteria several surrogate strains may meet most of them, for  
1781 parasite surrogates it is challenging to identify organisms according to those desirable traits.

1782  
1783 The concept of surrogate microorganism was also defined by Sinclair et al in a more  
1784 general scope as: “an organism, particle, or substance used to study the fate of a pathogen in a  
1785 specific environment” (Sinclair et al. 2012). This paper outlined a detailed conceptual decision  
1786 framework for selecting a surrogate and listed four possible types of surrogate benchmarking  
1787 and validation experiments. Based on this set of proposed experiments, validation of surrogates  
1788 can only occur if both the potential surrogate and the target microorganisms can be compared  
1789 under the same experimental conditions. The other benchmarking options described depend on  
1790 whether the target organism can be reliably grown and detected and if the surrogate organism  
1791 is known to have the greatest resistance of its category.

1792  
1793 *Cyclospora cayetanensis* is a coccidian protozoa classified under the family Eimeriidae  
1794 (Ortega 2019). *Eimeria* species are the coccidian parasites more closely related to *Cyclospora*  
1795 (Dubey, Khan and Rosenthal 2022) and both genera have a fecal-oral cycle and they infect  
1796 predominantly one host. *Eimeria* species are economically relevant parasites because they  
1797 infect poultry, cattle and other livestock causing significant losses to agriculture (Thompson and  
1798 Rosenthal 2020). *Eimeria* species have been extensively characterized and there have been as  
1799 many as 1,800 species identified that infect multiple vertebrate species (Burrell et al. 2020).  
1800 Interestingly, not a single *Eimeria* species has been reported to infect humans, but because *C.*  
1801 *cayetanensis* is so genetically similar, it was considered as the “human *Eimeria*.” *E. tenella* and  
1802 *E. acervuline* are the two most common poultry coccidia that their life cycle, pathogenesis, and

1803 invasion mechanism have been extensively described (Venkatas and Adeleke 2019). Because  
1804 of those similarities and the lack of limited laboratory tools to study *Cyclospora*, *Eimeria* is  
1805 considered the best surrogate for *C. cayetanensis*.

1806  
1807 In the most recent review paper that addressed the potential of *Eimeria* as a *Cyclospora*  
1808 surrogate, Tucker and coworkers conducted a systematic assessment that supported its  
1809 utilization (Tucker et al. 2022). That analysis recognized that the two major limitations to make  
1810 significant research progress to address the public health threat that *C. cayetanensis* represents  
1811 are the scarcity of oocysts and the lack of a viable animal model. According to the same study,  
1812 *Eimeria acervulina* and other poultry parasites meet several of the desirable criteria for a  
1813 surrogate organism described above. Another recently published study, the genomic and  
1814 genetic closeness of *E. acervulina* with *C. cayetanensis*, was also confirmed using gene  
1815 expression in maturing oocysts (Tucker et al. 2021). Because of the evidence presented these  
1816 two papers, there should be little doubt that *E. acervulina* is the most viable surrogate.  
1817 In addition to *Eimeria* species, *Toxoplasma gondii*, another coccidian parasite in the family  
1818 Sarcocystidae has also been investigated as *Cyclospora* surrogate (Lee and Lee 2001, Dubey  
1819 et al. 1998). Lee and Lee reported that a gamma irradiation dose greater than 1 kGy was  
1820 necessary for the complete inactivation of 650 *E. acervulina* oocysts inoculated on fresh  
1821 raspberries (Lee and Lee 2001). Those results were similar to previous studies conducted with  
1822 *T. gondii* and *E. tenella* (Dubey et al. 1998, Gilbert et al. 1998).

1823  
1824 *Toxoplasma gondii* was used as a surrogate for *C. cayetanensis* on raspberries  
1825 (Assurian et al. 2020). *T. gondii* as a *Cyclospora* surrogate poses several advantages that  
1826 include its extensive characterization, well defined models of gene annotation, availability of in  
1827 vitro and animal study models and a large network of scientist (Anderson, B., personal  
1828 communication). An additional positive aspect for using this parasite as surrogate is the high  
1829 resistance of its oocysts to inactivation, which can serve as a safety factor in developing  
1830 interventions against *Cyclospora*. In contrast, adoption of *T. gondii* as surrogate, presents  
1831 serious challenges. Public concern about the use of cats for research has led to a reduced  
1832 availability of oocysts for research. Because it is a human parasite, its utilization in research  
1833 may be a risk for laboratory workers. The lack of evolutionary relatedness and different life  
1834 cycles are probably the strongest argument against the use of *T. gondii* as *Cyclospora*  
1835 surrogate.

1836  
1837 The availability of a well-tested animal model for *Eimeria* presents one of the factors that favors  
1838 adoption of this parasite as *Cyclospora* surrogate (Tucker et al. 2022). In 1995, a detailed  
1839 protocol to grow and recover *Eimeria* oocysts from less than 5-day-old baby chicks was  
1840 published (Shirley, 1995). In addition to requiring the use of very young chicks, this method is  
1841 based on the use of coccidia-free animals. Because the different *Eimeria* species impact  
1842 different sites in the chicken GI tract, the recovery of merozoites was well described. This  
1843 method continues to be used to this date by researchers developing in-vitro cell culture methods  
1844 (Marugan-Hernandez et al. 2020). Chicken epithelial and kidney cell lines have been tested with  
1845 promising results and in the near future, a chicken-free method for harvesting oocytes may be  
1846 available for researchers (Bussière et al. 2018).

1847  
 1848 Tefera (2021) suggested using *C. parvum* as a surrogate for *C. cayetanensis*. Infections by *C.*  
 1849 *cayetanensis* can also lead to coinfections of opportunistic pathogens (OP) such as  
 1850 *Cryptosporidium*, therefore, if suspected, screening for *C. cayetanensis* when there is presence  
 1851 of OP should be considered. *Cryptosporidium* presents some favorable traits to be considered  
 1852 a surrogate such as extensive characterization, availability of oocysts, developed tools and  
 1853 similar tolerance levels. However, its life cycle differences, large taxonomic separation, and  
 1854 multiple hosts limit the extrapolation of *C. parvum* to *C. cayetanensis*.  
 1855 Given current limited availability of *C. cayetanensis* oocysts, validation of surrogates remains  
 1856 challenging.

1857  
 1858 Table 4. Comparison of *Eimeria*, *Toxoplasma gondii* and *Cryptosporidium parvum* as possible  
 1859 surrogates for *Cyclospora cayetanensis*.

Trait	<i>Eimeria</i>	<i>Toxoplasma gondii</i>	<i>Cryptosporidium parvum</i>
Taxonomic family	Emeriidae	Sarcocystidae	Cryptosporidiidae
Existing animal model	Baby chicks	Cats, controversial	Multiple
Life cycle	Very similar	Different	Different
Lab worker risk	Small	Significant	Moderate
Oocyst tolerance	Similar	More tolerant	More tolerant
Number of hosts	Single	Multiple	Multiple

1861  
 1862 **Q16: Maintenance and conveyance of wastewater**

1863 **Are there practices for the maintenance and conveyance of wastewater, septage or**  
 1864 **human waste that may increase the incidence of *C. cayetanensis* contamination? Are**  
 1865 **there practices that may be useful in the management of waste to reduce the potential for**  
 1866 **contamination by *C. cayetanensis* (e.g., third-party toilet service or municipal wastewater**  
 1867 **treatment)?**

- 1868 a) **Which wastewater, septage, and human waste treatments in the U.S. are effective**  
 1869 **against *C. cayetanensis*? Which treatments may not be effective against *C.***  
 1870 ***cayetanensis*?**
- 1871 b) **Does municipal water treatment adequately reduce, control or eliminate *C.***  
 1872 ***cayetanensis*?**
- 1873 c) **Can effective municipal water treatments systems be scaled to treat agricultural**  
 1874 **water used in produce production?**
- 1875 d) **How do practices compare for domestic growers versus international growers**  
 1876 **who export to the U.S.?**

1877 The low prevalence of *Cyclospora* in U.S. wastewater impedes our understanding of the  
 1878 effectiveness of current wastewater treatments against these protozoa. Available information  
 1879 suggests that physical removal methods, such as sand-filtration, as well as exposure to sunlight  
 1880 (UV) lead to measurable reductions of parasite load. Improvements in detection methods as  
 1881 well as studies with surrogate protozoa may assist our understanding in the future. Although

1882 agricultural water sources may serve as a potential contamination route, there is little  
1883 information on what practices a grower can deploy to reduce risk beyond physical removal.  
1884

1885 **a) Which wastewater, septage, and human waste treatments in the U.S are effective**  
1886 **against *Cyclospora cayetanensis*?**  
1887

1888 Although parasites, including *C. cayetanensis*, are considered wastewater-associated  
1889 pathogens, there is minimal evidence that current wastewater treatment practices are  
1890 sufficiently effective to address the potential health risk. Parasite occurrence and concentration,  
1891 including *C. cayetanensis*, in wastewater can vary greatly and is highly dependent on many  
1892 factors, including source, season, human population demographics and population prevalence  
1893 rates. Generally, in the U.S., the prevalence and concentration of *C. cayetanensis* is expected  
1894 to be low (Zarlenga and Trout 2004). This low prevalence makes it difficult to measure the  
1895 effectiveness of the many and varied wastewater, septage and human waste treatment  
1896 processes in use across the US. Limited data are available specific to *C. cayetanensis* reduction  
1897 related to chemical, biological and physical wastewater treatments. Chemicals commonly used  
1898 in water treatment, such as chlorine or chlorine dioxide gas, have limited effect on *C.*  
1899 *cayetanensis*.(Ortega et al. 2008)  
1900

1901 Research on physical methods, such as sand filtration, support effectiveness in reducing  
1902 *Cyclospora* spp. oocysts. For example, a study in rural areas of Nepal measured the impact of  
1903 diarrheal disease following introduction of sand-filtered drinking water. With respect to *C.*  
1904 *cayetanensis*, the researchers noted 88.2% removal rate of oocytes (confirmed by microscopy)  
1905 in water samples and a reduction of 4.9% in diarrheal disease within the community. 10  
1906 While the research on inactivation of *C. cayetanensis* in wastewater, septage and human  
1907 wastewater could be important, it will be hampered by the lack of available oocysts. The use of  
1908 various surrogates is more practical, but it is important to recognize that no surrogate will  
1909 respond to treatment exactly as the target organism. On-going studies indicate that *Eimeria*  
1910 spp. exhibit reasonable sensitivity to some common treatments (REF).  
1911

1912 **b) Does municipal water treatment adequately reduce, control or eliminate *C.***  
1913 ***cayetanensis*?**

1914 Naganathan, et. al (2022) 16 completed a comprehensive review and meta-analysis of *C.*  
1915 *cayetanensis* in water. Their search identified 33 articles which met the researchers' criteria for  
1916 inclusion in their analysis of the prevalence of *Cyclospora cayetanensis* in different types of  
1917 water. In brief, the authors, demonstrated that when all analyses are combined (92 prevalence  
1918 estimates from 33 studies), *Cyclospora cayetanensis* prevalence was estimated to be 6.9% in  
1919 global water samples. The authors noted constraints on their analyses including a bias toward  
1920 datasets from endemic areas, and the use of data from studies in which only a single step  
1921 detection was used (which likely to have overestimated the numbers of *C. cayetanensis*  
1922 in samples). However, despite constraints they estimated that household or drinking water  
1923 prevalence was 5.12%, and water used for irrigation had the highest prevalence at 17.1%.  
1924 A study of two wastewater treatment plants in Arizona found *C. cayetanensis* in both the influent  
1925 and effluent. (Kitajima et al. 2014) Nine of the 48 water samples collected from 2011-2012 were

1926 positive for *C. cayetanensis* using a novel qPCR technique; however, the authors did not  
1927 determine the removal efficiency of the wastewater treatment plants. The authors concluded  
1928 that existing regulations for water treatment are insufficient to protect the public from *C.*  
1929 *cayetanensis* because there are no regulations for managing *C. cayetanensis* in drinking water  
1930 or wastewater. Further work is needed to understand the specific wastewater treatment  
1931 practices that would demonstrate sufficient effectiveness to benefit public health in the context  
1932 of the contributing population.

1933

1934 **c) Can effective municipal water treatment systems be scaled to treat agricultural**  
1935 **water used in produce production?**

1936 Water scarcity is a major public health problem which impacts billions of people around the  
1937 globe and is an issue that is only becoming worse due to climate change. Parasite removal can  
1938 vary considerably in wastewater treatment plants (WTP) for reasons previously discussed. A  
1939 five-year study of the efficacy of pathogen removal for a California water reuse facility supported  
1940 a very low prevalence of *Cryptosporidium spp.* oocysts, *Giardia spp.* cysts, and *Cyclospora spp.*  
1941 oocysts in the effluent, 2.3, 0.3 and 0.034 cysts/L, respectively. Importantly, these  
1942 concentrations were not considered a health risk. 17 Water reuse considerations are critical to  
1943 the evaluation of the effectiveness of municipal water treatment systems and the downstream  
1944 applications of reclaimed water, including agricultural applications. In the aforementioned study,  
1945 the expectation was that the water intended for agriculture meet California Title 22 standards  
1946 consistently. Assuming that this standard is sufficient to manage the potential health risk, then it  
1947 provides a model for other municipal systems to consider.

1948

1949 Finally, our understanding of the effectiveness of municipal water treatment systems and their  
1950 applicability to treat agricultural water is limited by the methodology applied to data gathering.  
1951 There remain important considerations for the specificity and sensitivity of the detection  
1952 methods and until resolved there will be limitations to scientific approaches to evaluations of not  
1953 only the risk presented by agricultural water for specific crops and corresponding irrigation  
1954 systems but also effective risk reduction measures.

1955

1956 **Q17: Prevention in food**

1957 **What elements or points in the parasite's life cycle are potential targets of strategies to**  
1958 **disrupt its progression, eliminate or destroy oocysts, stop dissemination into the**  
1959 **environment, and prevent food contamination?**

1960 a) **What are control measures that should be evaluated for effectiveness against**  
1961 ***Cyclospora cayetanensis*? Including control measures that can be applied to the**  
1962 **environment and/or foods that may be consumed in the raw form.**

1963 b) **What is a recommended protocol for evaluating the effectiveness of control**  
1964 **measures against *Cyclospora cayetanensis*?**

1965 Control measures for *C. cayetanensis* should target both the sporulated and unsporulated  
1966 forms. Control strategies should start with measures at the farm and food production levels with  
1967 the provision of proper handwashing and toileting facilities for workers. The detection methods  
1968 used will need to also be evaluated in the presence of *Cyclospora spp.* that are not human

1969 pathogens to ensure that any positive samples represent contamination specifically by *C.*  
1970 *cayetanensis*.

1971

1972 Because the sporulated oocyst is the infectious form of the parasite, reduction or prevention of  
1973 oocyst sporulation may be a way to control *C. cayetanensis*. However, because the  
1974 unsporulated oocyst can become sporulated, the best control strategy would target both stages  
1975 of the parasite lifecycle to reduce or prevent dissemination of *C. cayetanensis*. Furthermore,  
1976 there is currently no standardized way to distinguish between the unsporulated and sporulated  
1977 *C. cayetanensis* oocyst except microscopy. However, a molecular technique that relies on  
1978 detection of differentially expressed genes between mature and immature oocysts in model  
1979 organism *E. acervulina* was recently published (Tucker et al. 2021). That same study reported  
1980 that *C. cayetanensis* has genes similar to differentially expressed genes identified in *E.*  
1981 *acervulina* during sporulation (Tucker et al. 2021). Nonetheless, the identified genes from the  
1982 Tucker et al. study would need to be validated for the capacity to discriminate between  
1983 unsporulated and sporulated *C. cayetanensis* before they could be used.

1984

1985 Because no non-human reservoir for *C. cayetanensis* has been identified, the most appropriate  
1986 point at which reduction of parasite contamination is likely to succeed is in the environment  
1987 around produce production. Environmental controls that can be implemented include inspecting  
1988 delivery vehicles and packaging materials for cleanliness, inspecting produce for damage and  
1989 filth, removing foreign matter, and maintaining records that allow traceback (Guidance for  
1990 industry, 2008). Proper toileting facilities and hand washing procedures for field workers and  
1991 food handlers should also decrease the contamination of the environment and food with *C.*  
1992 *cayetanensis*. Field workers that are sick should be able to stay home until they have recovered.  
1993 Produce that is to be cut should be washed to reduce microbial contamination from the surface  
1994 onto cut surfaces (Guide for industry, 2008). Because water washes were shown to dislodge  
1995 oocytes from market produce, it is reasonable to hypothesize that washes can reduce the load  
1996 on the product (Duedu et al., 2014; Ortega et al. 1997). Water used for cleaning produce must  
1997 comply with all Federal, State, and local requirements. In addition, if water is reused, the  
1998 cleanest water should be used in the final wash step (Guide, 2008). The use of temperature to  
1999 prevent oocyst sporulation may require too extreme of temperatures to be practical  
2000 (Sathyanarayanan and Ortega 2006). Therefore, a strategy to reduce, destroy or eliminate  
2001 oocysts prior to produce reaching the consumer is important.

2002

2003 **a) What are control measures that should be evaluated for effectiveness against *C.***  
2004 ***cayetanensis*? Including control measures that can be applied to the environment**  
2005 **and/or foods that may be consumed in the raw form.**

2006 Control measures that have been shown to be effective against other parasites could be  
2007 evaluated for *C. cayetanensis*, however we note earlier studies with chlorine, ClO<sub>2</sub>, or UV had  
2008 limited success (Gaafar, 2007; Ortega et al., 2008). In contrast, treatment with magnesium  
2009 oxide (MgO)-coated particles reduced sporulation of unsporulated oocysts, and viability of  
2010 sporulated oocysts by 50% when used at 10 mg/ml for 24 hours (Hussein et al., 2018).  
2011 Pesticides such as captan, benomyl, zineb, malathion, and diazinon did not reduce *C.*  
2012 *cayetanensis* sporulation when used as directed (Sathyanarayanan and Ortega 2004).

2013 Although, microwave-based heating of *C. cayetanensis* suspended in water resulted in about a  
2014 1/4 to 1/3 reduction in sporulation when temperature of the water reached approximately 50°C  
2015 after 10 seconds of heating, but temperatures of 95°C reached after 30 seconds of heating did  
2016 not eliminate sporulation (Ortega and Liao 2006).

2017  
2018 Various wash solutions have been tested to determine which would allow recovery from  
2019 basil artificially inoculated with *C. cayetanensis* to allow detection by laboratory –based methods  
2020 (Chandra, Torres and Ortega 2014). The solution that was the best at recovering the parasite  
2021 was a 1% HCl-pepsin solution, better even than Alconox detergent. It is unclear from the  
2022 publication what fold-reduction such a treatment would allow since the data were reported as  
2023 the number of samples positive for *C. cayetanensis* after the wash. However, such solutions  
2024 could be tested specifically as control measures in the future. Some studies on washing  
2025 methods have already been conducted. For example, running water removed roughly 40% of  
2026 the *C. cayetanensis* load from raspberries whereas washing inside a salad spinner or using a  
2027 vinegar wash removed more than 80% of the parasite (Temesgen et al. 2021). However, for  
2028 blueberries all three wash methods were greater than 95% effective (Temesgen et al. 2021).  
2029 The parasite was detected by RT-PCR with the internal transcribed spacer 1 (ITS-1) region as  
2030 the target (Temesgen et al. 2021, Temesgen, Tysnes and Robertson 2019). These studies  
2031 suggest that washing by the food preparer should result in reduced parasite load.

2032  
2033 The lack of *in vivo* or *in vitro* methods to test *C. cayetanensis* viability has prompted  
2034 researchers to use surrogate parasites, such as *Eimeria* or *Toxoplasma* species to evaluate  
2035 other treatments. For example, *Toxoplasma* oocysts irradiated with ≥0.4 kGy sporulated,  
2036 excysted, and infected cells but were not infectious in mice (Dubey et al. 1998). It was  
2037 recommended, therefore, that 0.5 kGy be used to kill coccidian oocysts on fruits and vegetables  
2038 (Dubey et al., 1998). However, inactivation of *Eimeria acervulina* oocysts required 1 kGy (Lee  
2039 and Lee, 2001). The use of high-pressure processing (HPP) demonstrated some effectiveness  
2040 against the surrogate *E. acervulina* and *Toxoplasma* (Kniel et al, 2007, Lindsay et al., 2008), but  
2041 has not been tested against *C. cayetanensis* to our knowledge. Additionally, the practicality of  
2042 using HPP for berries is doubtful.

2043  
2044 **b) What is a recommended protocol for evaluating the effectiveness of control**  
2045 **measures against *C. cayetanensis*?**

2046 Given the low levels of *C. cayetanensis* in the final product, establishing reasonable targets for  
2047 reduction are challenging. A further complication is the lack of information on the infectious  
2048 dose (though suspected to be low). However, it is important that a set of reasonable  
2049 preventative or control measures be put in place to minimize or mitigate the risks of this  
2050 pathogen in commodities that have been associated with outbreaks of human illness. Validation  
2051 of control measures is complicated by the lack of *C. cayetanensis* oocysts readily available for  
2052 research. Currently, oocysts are taken from clinical fecal samples. However, more robust  
2053 studies will require consistent access to oocysts. The use of *C. cayetanensis* oocysts for  
2054 experiments requires the development of approaches for generating oocysts under laboratory  
2055 conditions. Once there is a reliable source of *C. cayetanensis*, methods for control and  
2056 detection can be tested. For detection of the organism, it would be ideal to ascertain not only

2057 absence/presence but also whether the organism is viable. To test detection methods, food  
2058 products are spiked with a known quantity of *C. cayetanensis*, and the RT\_PCR methods  
2059 already described are likely adequate in the absence of native background. However, when the  
2060 research moves to food products with unknown levels of *C. cayetanensis*, it will be important to  
2061 distinguish *C. cayetanensis* oocysts from any possible *Cyclospora* contamination of other  
2062 species. Such studies could initially be done with food products spiked with both *C.*  
2063 *cayetanensis* and *Cyclospora* from other animals such as chickens or dogs.

2064

#### **Q15b: Strategies use to mitigate the contamination from farm workers**

2065 **What are strategies that have been utilized to mitigate the contamination from farm**  
2066 **workers? Have efforts to mitigate contamination from farm workers been successful?**

2067 **What environmental indicators may be helpful in verification of mitigation practices?**

2068 Currently, mitigation for *C. cayetanensis* includes increased hygiene and protective gear for  
2069 farm workers. It is not clear if those efforts have been successful, as testing is not routinely  
2070 done. Testing for reduction in fecal contamination indicators would be the most practical method  
2071 to verify mitigation practices.

2072

2073  
2074 At present, the primary strategy to mitigate contamination of fresh produce by *Cyclospora*  
2075 *cayetanensis* has been to focus on prevention via farm worker training including the topics of  
2076 personal hygiene, clean clothing and other protective gear, such as gloves and boots,  
2077 equipment management and appropriate sanitary maintenance of toilet facilities.  
2078 Routine water testing for fecal coliforms and/or other markers of human fecal contamination can  
2079 also be used as an indicator of potential risk regarding the presence of other bacterial, viral or  
2080 parasitic pathogens. Some operations may also use routine health evaluations and clinical  
2081 testing for *Cyclospora* as a mitigation strategy for the worker populations, in growing regions  
2082 outside of the United States. In a recent paper, L. Chacin-Bonilla and M. Santin (Chacin-Bonilla  
2083 and Santin 2023) proposed that in developed countries, there is a likelihood that endemic  
2084 population foci of *Cyclospora* infections may exist, most likely in socially and economically  
2085 disadvantaged communities, such as rural farm-worker communities, thus, raising concerns  
2086 regarding transmission issues. The authors believe there would be benefit in exploring the  
2087 potential for endemic foci to better define the sources of infection, routes of spreading and  
2088 potentially environmental contamination including produce fields, water sources and animals.

2089

#### **Relevant Factors and Data Gaps – What we know and what we don't know.**

2090

#### **Q18: Relevant factors, available data, and data gaps for quantitative risk assessment**

2091  
2092 **What are the relevant factors, available data, and data gaps needed to develop an**  
2093 **informative quantitative risk assessment model for *C. cayetanensis* contamination and**  
2094 **risk of illness?**

2095

2096  
2097 In developing a framework for controlling this parasite (and other foodborne pathogens), it is  
2098 important to consistently rely on risk-based and not on hazard-based approaches. Risk-based  
2099 and risk-appropriate measures have been the hallmark of the US regulatory process and  
2100 management approaches. A hazard-based approach to regulation should be avoided.

2101 In assessing the risk of cyclosporiasis and establishing an actionable risk assessment  
2102 framework, there are significant data gaps pertaining to sources of *C. cayetanensis* in the crop  
2103 production environment and its routes of transmission, persistence in the crop production  
2104 environment (especially in the areas where it is not endemic), the utility of indicators, accuracy  
2105 of analytical methods, control strategies and applicability of surrogates to develop control  
2106 measures.

2107  
2108 Fresh produce represents a high percentage of foods associated with past *Cyclospora*  
2109 outbreaks; numerous events attributed to processed salads, berries and herbs (Temesgen et al.  
2110 2021). Products consumed fresh represent a challenge for food safety due to the limited number  
2111 of approaches available to control microbial risk while maintaining the attributes demanded by  
2112 the consumer (e.g., freshness, texture, color) (Kniel et al. 2007). In addition to the lack of many  
2113 mitigation methods for fresh produce, managing parasite risk is further complicated since the  
2114 oocysts of many foodborne parasites, such as *Giardia*, *Cryptosporidium* and *Cyclospora*, have  
2115 been observed to harbor physical structures that facilitate adherence to surfaces; consequently,  
2116 physical removal from food surfaces is even more difficult (Temesgen et al. 2021). Further  
2117 evaluation of the risks to public health for cyclosporiasis illnesses and the detection and control  
2118 of *Cyclospora cayetanensis* in food, water and the environment can be enhanced by addressing  
2119 many of the data or research gaps listed below.

2120

#### 2121 **Sources and routes of contamination.**

- 2122 • *C. cayetanensis* is a host-limited parasite, and human fecal contamination is the main (if not  
2123 only) source of the oocysts. However, it is not known and critically needed to be understood  
2124 for how long oocysts remain viable and infectious under the diversity of conditions  
2125 associated with the fresh produce value chain.
- 2126 • Measures of endemicity: A defined criteria and measures are needed to standardize  
2127 designations of endemicity and non-endemicity transmission. This may also aid in the  
2128 identification of pockets of endemicity and assess trends.

2129

#### 2130 **Prevalence and persistence of *C. cayetanensis*.**

- 2131 • There appears to be a seasonal pattern in outbreaks where *C. cayetanensis* is endemic, but  
2132 no specific climate-linked condition has been identified. Even though non-endemic in the  
2133 US, global trade results in products and ingredients imported throughout the year.  
2134 Therefore, year-round vigilance is important, even though no outbreaks in winter have been  
2135 reported in the US.
- 2136 • Approaches for the mitigation of the risk of transmission of *C. cayetanensis* will differ in the  
2137 areas where it is endemic vs non-endemic. In areas where *C. cayetanensis* is not endemic  
2138 (such as many of the production areas in the continental US), it will be important to focus  
2139 mitigation efforts on the likeliest sources of the *C. cayetanensis* oocysts (i.e., human  
2140 vectors). We note the importance of global trade, and the fact that even domestically  
2141 acquired infections may be ultimately linked to products or ingredients originating from areas  
2142 where it is endemic.
- 2143 • The persistence and prevalence of *C. cayetanensis* oocysts in the post-harvest environment  
2144 is an especially notable data gap.

2145

2146 **Indicators for *C. cayetanensis*.**

- 2147 • As discussed earlier, we acknowledge that no perfect biological or chemical indicator exists  
2148 for *C. cayetanensis*. However, given the low prevalence of *C. cayetanensis*, even in the  
2149 areas where it is endemic, there is a need to establish a reasonably reliable indicator.  
2150 Meanwhile, validated indicators of human fecal pollution can serve as convenient indicator.

2151

2152 **Analytical methods.**

- 2153 • The low prevalence of *C. cayetanensis* in environmental samples (including finished  
2154 product) represents a statistical challenge. Therefore, a method to concentrate oocysts from  
2155 large volumes of water is needed.
- 2156 • A lack of availability of oocysts to serve as a positive control can hinder laboratory detection  
2157 method development.
- 2158 • Given the diversity of *Cyclospora*-like organisms that are not known to be pathogenic to  
2159 humans but share significant homology with target DNA sequences used for the pathogen  
2160 detection, there is a need to develop a tool for *C. cayetanensis* detection using a simple,  
2161 reproducible, and robust method. Given that the infectious dose of *C. cayetanensis* is not  
2162 known, a qualitative detection method for non-clinical samples may be sufficient.
- 2163 • Methods to determine infectivity or viability of oocysts are lacking, but improved quantitative  
2164 or qualitative methods for detection of oocysts may have a greater public health impact.

2165

2166 **Control strategies and mitigation.**

- 2167 • *C. cayetanensis* appears to be resistant to common chemical interventions widely used in  
2168 the fresh produce industry. Therefore, additional antimicrobial processes or chemicals  
2169 should be evaluated.
- 2170 • In the absence of sufficient information on the sources of the pathogen and its routes of  
2171 transmission in the areas where it is not endemic, additional efforts to develop and  
2172 implement GAPs aimed at specific/likely routes of transfer should be considered (i.e.,  
2173 Produce can be contaminated due to little or no washing, contamination by food handlers,  
2174 crop irrigation with untreated water, and contaminated soil.)
- 2175 • In the absence of validated control strategies, a focus on preventative approaches is  
2176 warranted. Post-harvest processing to potentially control *C. cayetanensis* and others.
- 2177 • Further work is needed to understand the specific wastewater treatment practices that would  
2178 demonstrate sufficient effectiveness to benefit public health in the context of the contributing  
2179 population.
- 2180 • *Eimeria* spp. (another parasitic protozoa) are the most appropriate surrogate organisms  
2181 known at the time of this report's writing. These and other organisms should be further  
2182 studied for use as a surrogate for *Cyclospora* or *C. cayetanensis*. A lack of reliable access  
2183 to *C. cayetanensis* oocysts hampers further efforts, and a method for culturing oocysts in the  
2184 laboratory will significantly advance efforts to control it.

2185

2186 **Risk assessment framework.** A risk characterization will need to integrate elements of (1)  
2187 hazard identification, 2) exposure assessment, and 3) hazard characterization into an estimation  
2188 of the adverse effects likely to occur in a given population, including attendant uncertainties. An

2189 infectious dose of *C. cayetanensis* is not known, and this may be difficult to determine. Excreted  
2190 organisms are not infectious and require maturation for 7 to 14 days in the environment.  
2191 Furthermore, the impact on infectivity is unknown for both the “age” of oocysts and the  
2192 food/water matrix source of contamination. Immunocompromised individuals are at a greater  
2193 risk of infection or illness, and there appears to be immunity in people who have had *C.*  
2194 *cayetanensis* as children resulting in asymptomatic infections.

2195  
2196 *C. cayetanensis* has been detected in chlorinated water, wastewater, irrigation water,  
2197 and produce processing wash water. Foodborne illness outbreaks globally have been linked to  
2198 the consumption of fresh fruits and vegetables. Collaboration should be encouraged between  
2199 food and agricultural industries, academia, states, and local and foreign partners to promote  
2200 research and share data to better understand the prevalence of *C. cayetanensis* in agricultural  
2201 water and soil.

2202

2203

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DRAFT

Term	Definition
18S	A component of the eukaryotic ribosomal ribonucleic acid (RNA). Detection of the 18S rRNA is used as an indication of the presence of a species. The sequence of the 18S rRNA gene is used to determine relatedness among organisms.
Apicomplexa	A group that derives its name from the apical complex, a collection of anterior structures that allow the parasite to invade host cells and establish themselves therein.
Apicoplast	The apicoplast is a secondary plastid organelle unique to most species within the phylum Apicomplexa that is essential for survival.
apicoplast genome	Apicoplasts contain their own DNA (35kb circular DNA) that shares sequence similarities with plastids (organelles found in the cells of photosynthetic organisms like algae and plants).
<i>Cyclospora cayetanensis</i>	A single-celled parasite that is human-specific and transmitted through food or water contaminated with human feces. The causative agent of cyclosporiasis.
cyclosporiasis	An intestinal disease caused by <i>Cyclospora cayetanensis</i> characterized by watery diarrhea. Diarrhea may be persistent in some individuals.
coliform	Intestinal bacteria that are indicators of fecal contamination
Eimeria	A genus of parasites that includes some species that cause coccidiosis (diarrhea) in animals.
endemic	A geographical location in which an organism is present consistently.
HPP	high-pressure processing or high-hydrostatic-pressure processing
indicator	An organism(s) whose presence is used to suggest the presence of a pathogen.
In silico	Detected by computer search rather than by experimental procedure in the laboratory
mitochondrial genome	The mitochondria (organelle that provides energy to the cell) contains its own DNA that is separate from the DNA held in the nucleus.
MLST	Multilocus sequence typing: a technique in which the DNA sequences of parts of several genes are used to divide organisms into different groups.

prevalence	The fraction or percent of the samples positive for the assessed parameter.
qPCR	Quantitative PCR
reference genome	A complete assembly of the DNA sequence from a representative organism. The sequence is available in a digital database for comparison with newly derived sequence data.
risk-based sampling	A method that prioritizes sampling of products considered as having a greater likelihood of being positive. This is as opposed to random sampling.
root cause analysis	A process used to find the cause of a problem so that solutions may be identified.
sporadic case	An illness not associated with an outbreak.
surrogate	An organism used to estimate the activity of a pathogen.

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**Appendix B: Additional Tables**  
Table 1

Method	Advantages	Disadvantages
<b>PCR</b>	<p>High sensitivity compared to culture and staining (Liu et al. 2019)</p> <p>Ability to test for anti-microbial resistance (Liu et al. 2019)</p> <p>Quickly performed in 3-7 hours (Giangaspero et al. 2015b)</p>	<p>Potentially lower specificity compared to culture and staining (Liu et al. 2019)</p> <p>Need for a narrow list of causative agents to use specific primers (Liu et al. 2019)</p> <p>Supply costs, machinery fees, training expenses (Lalonde et al. 2022)</p>

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	Increased ability to detect fewer common organisms such as viruses (Kahler et al. 2021) Shown to be more cost-effective with selective use than culture and staining (Giangaspero et al. 2015b)	Becomes less cost-effective when performed with a multi-organism PCR approach (Craighead et al. 2021)
<b>Flow Cytometry</b>	Can handle large quantities of specimens (Quintero-Betancourt et al. 2002) Automated(Quintero-Betancourt et al. 2002) Relative sensitive (Duhain et al. 2012)	Very slow (Quintero-Betancourt et al. 2002) Often not necessary, since there are other alternatives(Quintero-Betancourt et al. 2002) Nucleic acid dyes might not be as reliable as infectivity studies in predicting the inactivation of oocysts following treatment (Duhain et al. 2012)
<b>Microscopy: was it successfully used to diff viable/infectious from non- infectious?</b>	Relatively simple technique (Masangkay F. R., 2019) Possible to count the number of parasites (Masangkay F. R., 2019) More useful than rapid diagnostic tests (Sathyanarayanan L. & Ortega Y., 2007)	Requires a level of skill (Masangkay F. R., 2019) They often lead to false-positive or false-negative results (Sathyanarayanan L. & Ortega Y., 2007)

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2717 Table 2

	<b>PCR</b>	<b>Flow Cytometer</b>	<b>Microscopy</b>
<b>Pre-treatment</b>	<p>Fresh products were purchased a maximum of 24 hours prior to use, those fresh products were sampled and weight in bags with a microperforated filter. The bags before sealing need to dry at room temperature for about 3 to 4 hours and are finally stored overnight at 4 °C prior to processing.</p> <p>Water was stored at -80 °C, then the contaminated water was filtered using a cheesecloth and centrifuged at 2125 x g for 30 minutes, all the water that was in the top was discarded. All the bottom particles were mixed using a pipette.</p>	<p>Fresh products are washed with ethanol, the inoculum was placed on the surface of the green peppers' pieces, those pieces were placed inside sterile tubes, to be dried at 4 °C for 1 hour each tube before treatment.</p> <p>Water, there is no filter to pretreat water, just the use of a centrifuge</p>	<p>Fresh products were washed for approximately 6 to 7 minutes, and each vegetative sample was eluted y vigorous agitation followed by sonication for 30 minutes. The supernatant was discarded, and the pellets were washed by centrifugation.</p> <p>Samples of water was collected using a sterile polyethylene cup attached. The collected water samples were placed inside an ice chest. To be transported processing within 24 hours.</p>
<b>Quantities</b>	<p>Three studies were conducted involving different ranges in analysis. The first one did not have confirmation of the result, the second involved different studies in which PCR had the</p>	<p>We could not find ranges or numbers of analysis</p>	<p>There were several studies in which it was determined that the range and number of analyses was made by</p>

highest result. Finally, the third study had similar results to the second one

comparison between two or more variables

**Sensitivity**

High sensibility including for fresh and frozen fruits

Can detect cells between 1 and 15 microns in diameter, although it is possible to detect particles outside of this range (0.2 -150 microns) using specialized systems (Rowley, 2010)

Low sensitivity in a range of 40% and 50% (Omoruyi, Nwodo, Udem, & Okonkwo, 2014)