

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Items 5, 6

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ORIGINAL LANGUAGE ONLY

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### AD HOC CODEX INTERGOVERNMENTAL TASK FORCE ON ANTIMICROBIAL RESISTANCE

#### Eighth Session

#### Comments of Ghana

Agenda Items 5      **Code of Practice to Minimize and contain Foodborne Antimicrobial Resistance - (CX/AMR 21/8/5)**

Ghana appreciates the Electronic Working Group (EWG) and the Working Group (WG) for the good work done in refining this document.

#### Section 3, Definitions

**Position:** Ghana supports retention of the definition of “therapeutic use” in section 3 of the document.

“[Therapeutic use: Administration or application of antimicrobial agents for the treatment, control/metaphylaxis or prevention/prophylaxis of disease.]”

#### Rationale:

1. The term provides a clear distinction between responsible and prudent uses of medically important antimicrobials – that is for addressing conditions of disease and assuring the health of animals – as opposed to uses for improving animal production – that is for weight gain and feed efficiency.
2. The term aligns with the definition of “veterinary medical use” in OIE that includes treatment, control and prevention of disease.
3. The definition provides clarity in the rest of the document where the term or related terms are used.

#### Principle 13

**Position:** A proposal to merge **principles 8 and 13** and further recommends the following amendments to delete the bracketed **section of principle 13** (treatment, control/metaphylaxis or prevention/prophylaxis of disease) as follows:

“Medically important antimicrobial agents should only be used for therapeutic purposes and should be prescribed, administered, or applied only by, or under the direction of, veterinarians, plant/crop health professionals, or other suitably trained persons authorized in accordance with national legislation.”

#### Rationale:

**Principle 13** must be qualified in order to provide clarity as well as professional oversight on the specific circumstances that medically important antimicrobials should be used.

#### Section 5, paragraph 24, last bullet

**Position:** Amendment of **paragraph 24** last bullet by adding the words “and shelf Life” as follows: ‘Storage conditions **and shelf life**’.

#### Rationale:

1. International requirements for the establishment of a Summary of Product Characteristics for veterinary medicinal products (VMPs) requires an indication of shelf life where applicable, after reconstitution or after first time opening of immediate package”
2. Expired antimicrobial agents may lose some potency contributing to resistance when administered. The COP document addresses antimicrobial resistance and thus its inclusion is necessary.

**AGENDA ITEM 6**

CX/AMR 21/8/6-Add.1

**GUIDELINES ON INTEGRATED MONITORING AND SURVEILLANCE OF FOODBORNE ANTIMICROBIAL RESISTANCE (GLIS) (AT STEP 4)**

Ghana commends efforts of the Chair, Co Chairs, EWG AND WG towards the development of the GLIS.

**Section 1, Introduction and purpose**

**Position:** Ghana proposes a rearrangement of the paragraphs in this section as follows; Paragraph 1, 3, 2, 4, 5, 10, 6, 11, 7, 8, 9, 12 and 13.

**Rationale:** For paragraph coherence.

**Section 7, Paragraph 29**

**Position:** Ghana proposes the addition of the word “improvement” after the word “continuous” in the second sentence for the sentence to read as follows; “The concept of continuous **improvement** allows countries to carry out activities to progress according to country specific objectives, priorities, infrastructure, ....”

**Rationale:** As a minor edit.

**Section 9:****Sub section 9.3 Collection and reporting**

**Position:** AU Member States are encouraged to recommend revision of this sub section by :

1. Deleting the numerator and the denominator.
2. Merge para 89 and 90 as follows; “The data collection should cover antimicrobial quantities representing the amount of antimicrobial agents sold or used. This is normally expressed as weight in kilograms of the antimicrobials active ingredient which was sold or used in the monitoring and surveillance period. In some cases this may be based on estimates”.
3. Delete para 91
4. Revise para 92 by deleting the second sentence to read as follows:  
 “The data collection should cover the total food producing animal population or plant/crop area or quantities harvested that may be exposed to the antimicrobials reported during the monitoring and surveillance period.”
5. Retain para 93, 94, 95 and 97

Revise para 96 as follows “For plants/crops the information shall be guided by the relevant IPPC standard”.

**Rationale:** The OIE codes are clear and elaborate on monitoring use and sales of antimicrobials for veterinary medicinal use. Therefore **paragraphs 95 and 97** should be retained.

The concept of biomass calculation is work in progress at the OIE and these guidelines would be more effectively used when this work is complete. This will also ensure that there is no conflict with what the OIE standard requires and the GLIS document.

The use data for plant/crops should be guided by the relevant international standard setting body (IPPC). Currently no guidance from IPPC and it is advisable not to include guidance on Plant/crops at this moment.

**Section 2; Paragraph 16**

**Position:** The scope of the GLIS document as specified in paragraph indicates a focus on ‘foodborne pathogens and indicator bacteria of public health significance.

Foodborne pathogens of public health importance includes viruses, fungi and protozoa.

**Rationale:** Ghana proposes to specify a focus on bacterial foodborne pathogens in the scope in line alignment with a similar focus in the CoP (antibacterials agents ) whilst mentioning that the guidance provided in the GLIS can be applied to non bacterial foodborne pathogens.

**Section 8.5, point c**

**Position:** Delete “ included in the monitoring and surveillance program” and rephrase sentence as follows “ Participating in external quality assurance system including proficiency testing in identification, typing and AST of the microorganisms”

**Rationale:** 1. To avoid repetition of the same text in **paragraph 60**.

2. For simplicity

**Section 10.1, Paragraph 100**

**Position:** Replace the word “may” in this sentence with “ should”

**Rationale:** Risks occur when decisions are made from data that is not validated.

The validation of AMR and AMU data, is crucial since it serves as as inputs for risk analysis and informs the development and implementation of risk management options and policies to address foodborne antimicrobial resistance.