codex alimentarius commission

FOOD AND AGRICULTURE ORGANIZATION OF THE UNITED NATIONS

WORLD HEALTH ORGANIZATION

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Agenda Item 6 **CX/AMR 08/2/6 Add.2**

ORIGINAL LANGUAGE ONLY

September 2008

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

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

Second Session

Seoul, Republic of Korea, 20-24 October 2008

PROPOSED DRAFT RISK MANAGEMENT GUIDANCE TO CONTAIN FOODBORNE ANTIMICROBIAL RESISTANT MICROORGANISMS (REPORT OF THE PHYSICAL WORKING GROUP) (NO2-2008)

(Comments at Step 3)

IFT

The Institute of Food Technologists (IFT), the 22,000-member international society for food science and technology and a non-government organization of the Codex Alimentarius Commission is pleased to have the opportunity to rovide comments on "PROPOSED DRAFT GUIDELINES ON RISK MANAGEMENT TO CONTAIN FOODBORNE ANTIMICROBIAL RESISTANT MICROORGANISMS" at Step 3, Agenda Item 6 (CX/AMR 08/2/6, Appendix 1, June 2008).

IFT's Expert Report, "Antimicrobial Resistance: Implications for the Food System," published in 2006, provides the scientific perspective and background for our comments. The report is accessible at: http://members.ift.org/IFT/Research/IFTExpertReports/antimicrobial_report.htm .

Key points made in the IFT Expert Report include:

- The complexity of the antibiotic resistance issue precludes simple solutions. Resistance proclivity varies with the antimicrobial, bacterium, and usage patterns. Therefore, sweeping risk management measures that are proposed for a certain classification of use (non-therapeutic, growth promotion, and routine disease prevention, for example) can be draconian and without predictable results. Analysis should be carried out on a case-by-case basis, and driven by product-specific, science-based risk assessments.

- In spite of the best efforts to prevent or eliminate them, some antibiotic-resistant bacteria contaminate carcasses, as do antibiotic susceptible bacteria. Interventions that effectively reduce the prevalence of foodborne pathogens also reduce the prevalence of those that are resistant to antibiotics.

- The key points of influence that food scientists have in preventing the spread of antibiotic-resistant and sensitive pathogenic microorganisms in foods are preventing them from entering the food supply, and if present, inactivating them or preventing their growth.

- Most interventions, critical control points to kill or reduce foodborne pathogens, for example, are equally effective in controlling microbes regardless of their resistance to antibiotics. Thus, applying

interventions to control foodborne pathogens in general, rather than focusing on antibiotic-resistant strains specifically, would have the greatest impact in reducing overall foodborne illnesses.

• Risk management strategies to minimize and contain antibiotic-resistant foodborne bacteria are in place all along the food chain, but can be improved. The strategies that have been implemented include use of various antibiotic alternatives, implementation of judicious or prudent antibiotic use guidelines, and implementation of national resistance monitoring programs.

Specific comments;

IV. Identification of the Available Options

Para. 7.

Reword the statement as follows:

With regard to post-harvest, the aim should be to monitor trends in antimicrobial resistance and prevalence of foodborne bacteria and to apply targeted interventions aimed at reducing bacteria of importance to human and animal health, whether antimicrobial resistant or not.

Para. 9.

A.-Pre-harvest options

A.I-General

2nd bullet, (c) "AM product should not be authorized if risk assessment indicates unacceptable levels of risk." The meaning of this statement, and the definition of "unacceptable levels of risk" in particular are unclear, warranting clarification.

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A.2-Food animal production

6th bullet, "Prevent the presence and transmission of foodborne bacteria and determinants between animals and from animals to humans by implementing animal health and infection control programs against the most important zoonotic AMR agents."

This statement also needs clarification, e.g., to address what are the "most important zoonotic AMR agents" and how the food industry might respond to such a guideline.

A.2-Food animal production

7th bullet, "Restrict movement of live animals, carrying a specific AMR foodborne pathogen or a bacteria carrying resistance determinant (more comments required: in/out of scope of Codex? OIE remit?)."

Such a guideline may not actually aid the appropriate goal of preventing the spread of bacteria by restricting the movement of animals having antimicrobial resistant pathogens. Implementation of a monitoring program would be needed to determine prevalence and subsequently monitor occurrence. This may be an overly ambitious goal as all live animals may be carriers of some type of bacterium, pathogenic or not, that carry a resistance determinant.

A.3-Plant production

"Controlling the spread of AMR bacteria through other possible sources of contamination: direct use in agriculture of human and animal waste (manure) should be discontinued, if there is sufficient evidence of risk (practical, feasible and supported by science and to be revised in the light of further knowledge - more comments required)."

Although the implementation of this guideline would be beneficial, the practicality, as stated, is questionable. The statement would benefit from rewording to clarify the benefit of properly treating and composting waste to kill pathogens.

B.-Post-harvest options

1st bullet

Reword the statement as follows: Target interventions towards those bacteria that are foodborne pathogens, thus focusing on interventions against all foodborne pathogens, not simply resistant bacteria.

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2nd bullet, "Implement control measures to the extent possible;"

Reword this vague statement, to clarify what types of measures (pathogen control measures?), for example.

3rd bullet, "Prevent the food containing an unacceptable level of AMR bacteria and AM determinants, reaching the consumer"

This statement is unclear, as "unacceptable level" and the nature of "AM determinants" are not specified, and he difference in level of risk presented by pathogen contaminated raw foods (e.g., meat and poultry) not intended to be eaten raw, without cooking, and contaminated properly processed or cooked foods intended to be eaten without any further treatment is not recognized. The statement would benefit from rewording for clarity.

4th bullet, "Withdraw food containing an unacceptable level of AMR pathogenic bacteria from the market for reprocessing or destruction (commensals are not included here-to review the inclusion of commensals later on)"

This statement is unclear, as "food" is not specified as either raw or processed or both, and "unacceptable level" is not defined. It is not understood how an "unacceptable level" would be determined.

A.3-Precautionary approach:

Para. 20

"When there is evidence that a risk to human health exists but scientific data are insufficient or incomplete, it may be appropriate for countries to select a provisional decision, while obtaining additional information that may inform and if necessary modify the provisional decision. In those instances, the nature of the provisional decision should be communicated to all interested parties and the timeframe or circumstances under which the provisional decision will be reconsidered (e.g., reconsideration after completion of a risk assessment) should be articulated when the decision is communicated initially.

The practicality of this approach is questionable.

B.-Reaching a decision on the preferred risk management options

Para. 22

"Cross-resistance, co-resistance issues should be considered.

This statement is vague and would benefit from clarification, to address for example, how these two issues might be approached.

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Annex 1: possible endpoints

a): "Nature and extent of antimicrobial resistance."

This statement would benefit from clarification to indicate what (e.g., resistance among microorganisms in animals used for food?) the term "resistance" refers to.

Annex 2: step wise approach

Step 2

h): "Implement 1ocal/regional surveillance programs for foodborne disease."

This statement would benefit from clarification to indicate what (e.g., AMR pathogens associated with foodborne disease?) is meant by "surveillance programs for foodborne disease."

Step 3

i)

Reword as follows: Implement national surveillance programs for foodborne disease, including AMR pathogens associated with foodborne disease.