

CODEx ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 6

CRD03

ORINGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

AD HOC CODEX INTERGOVERNMENTAL TASK FORCE ON ANTIMICROBIAL RESISTANCE

Eighth Session

Comments of the United Kingdom

Title, Subtitle, Paragraph number	Comment Made
Paragraph 3	'Assessment of their impact' would be better.
Paragraph 4	What is meant by 'food production environment'? In the UK, this is usually used in the context of a processing/manufacturing facility, rather than a farm.
Paragraph 5	While recognising Codex's remit, AMR issues of concern via the food chain are not necessarily restricted to 'food safety' issues. For example, a person might not necessarily get sick from being exposed to foodborne E. coli bearing transferrable resistance to a HP-CIA, however, it could be the critical step in emergence of a new resistance in people, with ramifications for public health/One Health.
Paragraph 13	Wording is a little unclear - is this a distinction between standard-setting and advisory bodies?
Paragraph 14	See previous comment on 'food production environment'
Paragraph 16	A definition of indicator bacteria would be useful. It could also be useful to consider foodborne resistance genes (not necessarily harboured by a pathogen, but potentially transferrable to a pathogen): suggest 'foodborne pathogens and commensals of public health relevance...'
Paragraph 17	Does this exclude heavy metals, pesticides and triclosan?
Food Chain	Propose colon after 'including', and changing word order so processing comes before packing.
Food production environment	Suggest 'food chain environment'. See previous comments about 'food production environment'.
One Health approach	Environment should be plural: more than one environment is shared.
Principle 6	Microorganism should be plural.
Principle 9	Suggest should strive to harmonise sampling strategies as well as laboratory methodology, data collection, etc.
Paragraph 29	There is a word missing after 'continuous'
Paragraph 39	<p>Would also propose that consideration of the availability and usefulness of the wider metadata may be important relating to the samples collected. For foods this would relate to the size, description of the product or line, shelf-life, storage conditions etc. In other settings there may also be relevant metadata – for example, animal production system, or a prior history of antibiotic use.</p> <p>The point under AMU about assessing the need for legislative levers, as opposed to voluntary collection, also applies to collection of AMR data</p>
Paragraph 42	Propose include metadata/other supporting data
Paragraph 48	Propose include collection of metadata/supporting data.

Title, Subtitle, Paragraph number	Comment Made
Paragraph 51	Clarification of what is meant by indirect food exposure pathways would be helpful
Food producing animals – Bullet point 1	Propose add environmental samples such as boot swabs or dust
Food	Suggest food section should go last (last step in the food chain).
Food – Paragraph 3	Why are the types of food being specified? Is this unnecessarily limiting? What about ready-to-eat foods?
Paragraph 55 – Bullet point 2	This text doesn't match earlier text, which referred to indicator bacteria. Propose that commensal is preferable.
Paragraph 57	Is 'High priority' determined by international bodies or for individual countries to decide?
Paragraph 79	Propose consider associated metadata?
Paragraph 107	Food missing from last line?
Paragraph 111	Propose all results should be encouraged to be made publicly available, not just summary reports.