

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5, 6

CRD05

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

AD HOC CODEX INTERGOVERNMENTAL TASK FORCE ON ANTIMICROBIAL RESISTANCE

Eighth Session

Comments of Kenya

AGENDA ITEM 5: Proposed draft revision of the code of practice to minimize and contain foodborne antimicrobial resistance (CXC 61-2005) (CX/AMR/8/5) at Step 7

Section 3. Definitions

"[Therapeutic use (food-producing animals or plants/crops): Administration or application of antimicrobial agents for the treatment, control/metaphylaxis or prevention/prophylaxis of disease.]"

Position: Kenya supports retention of the definition of therapeutic use in section 3 of the document

Rationale: 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. The term aligns with the definition of “veterinary medical use” in OIE that includes treatment, control and prevention of disease. The definition provides clarity in the rest of the document where the term or related terms are used.

Principle 13

Kenya supports the 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.

AGENDA ITEM 6: PROPOSED DRAFT GUIDELINES ON INTEGRATED MONITORING AND SURVEILLANCE OF FOODBORNE ANTIMICROBIAL RESISTANCE (CX/AMR 19/7/6)

General Comment:

Kenya appreciates the EWG and the WG for the good work in refining the document. The draft guidelines are for posterity and every effort should be made to ensure that the document withstands the test of time.

Section 1, Introduction and purpose

Kenya proposes the 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

Comment: Kenya proposes 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: Omission of word and minor edit

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

Comment: Kenya recommends 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
6. 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 paras 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.