

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5,6

CRD6

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

AD HOC CODEX INTERGOVERNMENTAL TASK FORCE ON ANTIMICROBIAL RESISTANCE

Sixth Session

Comments of Chile

A.1. 1. DRAFT REVISION OF THE CODE OF PRACTICE TO MINIMIZE AND CONTAIN FOODBORNE ANTIMICROBIAL RESISTANCE (CXC 61-2005)

A.1.1. A. General Comments

- **Use of term plants/crops:** Chile would like to suggest the use of **food of plant origin**, instead of Plants/ Crops, to make reference to the specific edible products that can be exposure ways to the AMR and is also the term use in the expert report.
- **In English the document mention “crop health professional”, this is translated to Spanish as Plant Health Professional.** It is necessary to use the same term in English and Spanish in order to avoid the confusion with the type of professional that is mentioned. Also we would like to use the term professional and not consultant or advisor, because we think that given the importance of being the person in charge to prescribe antimicrobial agents for plant health m, should be someone with a professional formation.

A.1.2. B. Specific Comments

Section 1. Introduction

Paragraph 2: This Code of Practice addresses the responsible and prudent use of antimicrobial agents by participants in the food chain, including the role of regulatory authorities, pharmaceutical industry, animal health professionals and ~~plant/crop advisors or consultants~~ **Plant Health Professional**, and food producers and processors.....

Section 3 Definitions

Plant/crop advisor and consultant health professional: Plant/crop health professionals with knowledge and experience in crop production and protection practices.

Rationale: Professional means someone that has have a formal education on Plant Health, sometimes the advisor or consultant titles are only based in their experience.

Therapeutic use: Administration of antimicrobial agents for the treatment **OR** control/metaphylaxis ~~and prevention/prophylaxis~~ of disease.

Rationale:

Chapter 6.9 of the OIE Terrestrial Animal Code refers to the “Monitoring of the quantities and usage patterns of antimicrobial agents used in food producing animals” and the definitions for Veterinary Medical Use of Antimicrobial Agents means the administration of an *antimicrobial agent* to an individual or a group of *animals* to treat, control or prevent infectious disease, but it is our understanding that this definition it is only with the purpose of Monitoring of the quantities and usage patterns of antimicrobial agents used in food producing animals, so no quantities or data could be left out on those countries where the preventive use of antimicrobials agents is still permitted.

Chile considers that therapeutic use should be only consider in occasions where there are clinical signs or presentation of disease in an animal or group of animals.

Section 6. Practices during production, processing, storage, transport, retail and distribution of food

~~60bis. Control of technological treatments in the industry: Technological treatments of food preservation based on the application of one or more bacteriostatic factors to prevent microbial growth (sub-lethal treatments) can~~

~~increase the phenotypes of resistant bacteria, contrary to conventional bactericidal treatments. Modern conservation systems cause some bacteria to be only stressed and can increase resistance through phenotypic and / or genotypic adaptations. This adaptation is sometimes associated with an increase in resistance to different antibiotics.~~

Rationale: The paragraph is too ambiguous and didn't give examples that could lead to confusions of which treatments could lead to AMR.

60ter. Control of post-production contamination: Post-production contamination should not be underestimated. It can occur in the different stages of the production and consumption chain, in which food handlers have an important responsibility to avoid contamination of food with microorganisms that can be carriers of resistance genes. Food contamination usually occurs at times of increased handling, ~~in meat during slaughter or processing. In ready-to-eat foods, the real risk is presumed cross-contamination, directly between raw and processed foods or indirectly through contaminated hands, surfaces or utensils and vectors.~~ **Where also cross contamination should be avoided between food from different sources.**

Rationale: It is not only meat slaughter or process that can lead to cross contamination or contamination due to increase of handling.

B. 2. DRAFT GUIDELINES ON INTEGRATED MONITORING AND SURVEILLANCE OF FOODBORNE ANTIMICROBIAL RESISTANCE

B.1. A. General Comments

B.2. B. Specific Comments

Section 1: Introduction and purpose of the Guidelines

- These guidelines are intended to assist governments in the design and implementation of monitoring and surveillance systems for food-borne AMR along the food chain at the national level. Such programs are a fundamental part of national strategies and plans to minimize foodborne AMR ~~and an important component of a comprehensive national food safety system.~~

Rationale: Affirmation that is not necessary. Each country could decide the importance of having an Integrated Surveillance Plan for their food safety objectives.

- Each country should design and implement a system for monitoring and surveillance of foodborne AMR and AMU along the food chain that is appropriate to national circumstances. This should be informed by all available knowledge on priority foodborne risks due to AMR while taking into consideration the international dimension of AMR ~~and the need for data comparability between countries and sectors~~

Rationale: Chile prefers to avoid the references for international comparability, since this could have trade implications and should be decided by each country in a good faith basis.

Section 2: SCOPE

- These guidelines cover the design and implementation of an integrated monitoring and surveillance system for foodborne AMR and AMU along the food chain, including animals, crops and the ~~environment.~~ **Immediate food production or processing environment.**

Rationale: to be clearer in the scope, since the environment is a wide term that could lead to confusion when governments implement their integrated surveillance. Also is the term use in the expert report

SECTION 7: A stepwise approach to the implementation of an integrated monitoring and surveillance program of foodborne AMR

Sub section 7.3

Chile would like to erase program C from the table and only give the options for implementation when you have or not have previous data from monitoring or official studies.

Further elaboration on section 7.4 could be added to make recommendations on which components of the integrated surveillance could be enhance after you have accomplish the minimum requisites for an integrated surveillance.