CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Item 5, 6 **CRD10**

ORINGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

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

Seventh Session

Comments of healthforanimal

HealthforAnimals has carefully reviewed, and provided comments, on the Code of Practice and the Guidelines on Integrated Monitoring and Surveillance of Foodborne Antimicrobial Resistance. Nine observations are made that apply to both.

(a) **AMR action.** In the context of developing the two documents, it is important to recognize that there has been progress on AMR as related to agriculture. When the 2016 AMR Political Declaration was issued, only 14% of the world's population resided in a country with a national action plan. Today, 96% do. The Wellcome Trust published a Report in October 2019 (Review of Progress on Antimicrobial Resistance) that found *"There have been significant advances in reducing antibiotic use in agriculture",* though it noted a lot must still be done in LMIC countries. One Health policies that focus AMR interventions in agriculture on those actions that benefit public health are delivering.

(b) **Codex mandate and duplication.** The TFAMR should be prudent to remain within the Codex mandate and within its mandate from the Codex Commission. There are multiple occasions where this is not the case. Many delegations have repeatedly expressed a need to avoid duplication of effort between organizations and there are still several instances where this is the case.

(c) Complexity and workability. Many comments at past meetings and from the EWG consultations point to needless complexity. The TFAMR is creating global documents that should be practical and appropriate for purpose. Codex text should be written so that all members regardless of their prevailing conditions can apply it. There is significant opportunity to edit and simplify the texts to make them more practically applicable. Not doing so risks misdirection of valuable public and private resources from effective interventions to ineffective measures that burden food safety systems, enable trade barriers, and undermine consumer confidence.

(d) Adoption of policies should be science-based and apply principles of risk analysis. Science and risk analysis are the foundation of Codex. At times, the proposed text dwell away from science, evidence, and risk. The Codex Commission has repeatedly warned against this. Countries and institutions such as the World Trade Organization rely on the quality of science from Codex. Text that elevate unsupported opinion, conjecture, or references that are lacking in evidence and merit must be avoided. As such, risk assessment must precede risk management and remain consistent with Codex procedures.

(e) **Respect trade obligations and access to food.** There are recommended actions in the draft Guidance for Monitoring and Surveillance and Code of Practice that could place countries at odds with their World Trade Organization legal requirements. Many countries have expressed concerns that Codex text should be drafted to avoid misuse by, creating or enabling trade barriers. This concern has heightened following new legislation (about antibiotics for animal health) in one subregion that requires the extraterritorial application of the new laws, to operators in all countries that wish to export animal protein to that subregion. The adaptation by third countries to extraterritorial legislation risks misdirecting efforts to combat AMR by aligning with the offending country instead of fighting AMR according to local conditions. While this is inconsistent with the WTO rules, it could also be harmful to the health of animals and sustainability of food production.

(f) Interventions must be proportionate. Both texts should reflect policy guidance that enables countries to apply interventions that are proportionate to their public health risks from antimicrobial resistance. A one-size-fits-all approach can undermine efforts to contain antimicrobial resistance, undermine sustainable food production, affect the health of animals, and adversely impact international trade. The TFAMR should carefully consider the efficacy of each intervention proposed and the scientific evidence that may or may not support it.

(g) **Support the Sustainable Development Goals.** The texts should support and not undermine the United Nations Sustainable Development Goals (SDG)s. In order to face the challenge of producing more food in a safer and sustainable way, farmers must be able to access the full range of safe technologies, including veterinary products. Codex members can achieve appropriate levels of protection of consumer health (including risk from antimicrobial resistance), while at the same time ensuring that such measures are not more trade restrictive than necessary. Regulation and marketing programs that lack scientific evidence have yielded an environment where farmers and veterinarians are experiencing a steady reduction in their access to medicines. The removal of veterinary products without employing risk analysis could adversely affect the care of animals and the sustainability of livestock production.

(h) **Therapeutic use includes prevention, control, and treatment.** Scientific evidence and risk analysis principles are critical to determining indications for use. HealthforAnimals supports the Code of Practice's Principle 5 and Principle 7 as drafted in CX/19/7/5. These both represent substantial improvements from previous drafts; they retain the focus on medically important antimicrobials and align closely with the OIE's text for these categories in their Terrestrial and Aquatic Animal Codes.

(i) Antimicrobial agents are essential to human and animal health. Antimicrobial agents have an important role in human and animal medicine. The human and animal sectors have a shared responsibility to prevent or minimize pressure for the selection of antimicrobial risk factors in humans or animals. The TFAMR should reject the narrative that eliminating medicine will eliminate disease or that animal disease is solely a function of management. Instead, TFAMR should strive to help countries apply science and risk assessment measures, appropriately weigh the risks of different interventions, and select policies relevant for prevailing conditions**providing food to humans**