

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 11

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## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

### CODEX ALIMENTARIUS COMMISSION

39<sup>th</sup> Session

FAO Headquarters, Rome, Italy, 27 June – 1 July 2016

### CODEX WORK ON ANTIMICROBIAL RESISTANCE

#### COMMENTS

*(Comments of El Salvador, India, Papua New Guinea, Senegal, Thailand and HealthForAnimals)*

#### EL SALVADOR

El salvador apoya las recomendaciones hechas en el documento preparado por la Secretaría del Codex en colaboración con la FAO y la OMS)

iniciar una nueva labor sobre:

- a. la revisión del Código de prácticas para reducir al mínimo y contener la resistencia a los antimicrobianos (CAC/RCP 61-2005) (documento de proyecto adjunto: Apéndice 1, Parte 1);
- b. la formulación de las Directrices sobre la vigilancia integrada de la resistencia a los antimicrobianos (documento de proyecto adjunto: Apéndice 1, Parte 2);
- ii. crear un grupo de acción específico sobre resistencia a los antimicrobianos (proyecto de mandato adjunto: Apéndice 2) y determinar el país o los países anfitriones;
- iii. pedir a la FAO y la OMS que presten asesoramiento científico en materia de resistencia a los antimicrobianos en colaboración con la OIE (proyecto de mandato adjunto: Apéndice 3);
- iv. pedir a la FAO y la OMS que elaboren un programa de fomento de la capacidad para satisfacer la necesidad determinada.

#### INDIA

##### Specific Comment

Para 5: Recommendations:

- i) a. India supports the future work on revision of Code of Practices to minimize and contain antimicrobial resistance.

##### Rationale:

1. The Code of Practice needs to be revised considering the latest technologies being adopted for risk analysis like gene sequencing techniques etc. which will be helpful in characterizing risk factors/organisms as well as in designing surveillance activities nation wise.
2. Revised Code of Practice should also emphasize on prohibition of the use of antibiotics as growth promoters/supplements in intensive farm practices like poultry industry. In spite of focusing on routine use of antibiotics for disease prevention/prophylactic use, lowering resistance-enhancing drug use through improved antibiotic targeting and mandatory provisions for farm hygiene and sanitation should be aimed at. Provisions from Good Animal Feeding Practices (GAFF), Good Animal Husbandry Practices (GAHP) and Guide to Good Farming Practices for Animal Production Food Safety (OIE Document) should also be taken into consideration while revising the COP.

- i) b. India also supports the development of Guidance on *Integrated Surveillance of Antimicrobial Resistance*.

**Rationale:** This will assist in amending/revising surveillance system in a way that captures the emerging resistance, determines trends in its spread and correlates with utilization of antimicrobial agents in community.

- ii) India would support the re-activation of *ad-hoc* Inter-Governmental Task Force.

**Rationale:** Since the proposed work is of a short term nature and limited in scope, establishment of the Task Force is an appropriate option. Further, the earlier work on antimicrobial resistance was also undertaken by a Task Force which was disbanded once the assigned work was completed.

## **PAPUA NEW GUINEA**

Papua New Guinea appreciates the comprehensive scientific assessments and exhaustive evolution of antimicrobial resistance work, which has been carried out by FAO, WHO, and OIE in order to propose the above mentioned project documents 1 & 2.

### **The position of Papua New Guinea**

Chair, Papua New Guinea is a developing country and its work on food standards, domestic and international trade is based on the Codex Standards which it has adopted.

Therefore, Papua New Guinea maintains that, decision making should be based on science, so that the institutional and scientific integrity of Codex mandate remains immortal.

On the issue of antimicrobial resistance, the National Codex Committee (NCC) met to debate the Agenda Item 11 (CX/CAC 16/39/12) thoroughly.

Since Papua New Guinea's legislative framework is not well positioned, hence the Codex Texts to address antimicrobial resistance issues is supported like any other developing countries. As such, Papua New Guinea also experience the antimicrobial resistance issues in our country.

Therefore, Papua New Guinea believes that this forum should consider revise Code of Practice to Minimize and Contain Antimicrobial Resistance (CAC/RCP 61-2005). Also, Papua New Guinea supports the project Document (Appendix 1), Part 1 – Proposal for New Work on the Revision of the Code of Practice to Minimize and Contain Antimicrobial Resistance (CAC/RCP 61-2005) and Part 2 – Proposal for New Work on the Guidance on Integrated Surveillance of Antimicrobial Resistance and the terms of references for the two proposals respectively.

Papua New Guinea believes the CAC39 session should endorse these two (2) proposals in principle and be delegated to appropriate Codex Committee such as Codex Committee on Veterinary Drugs in Food (CCRVDF) and Codex Committee on Food Hygiene (CCFH) for further deliberations towards revising the Codex text through the electronic working group (EWG), physical working group (PWG) and during the actual Committee sessions.

Papua New Guinea believes that once antimicrobial resistance (AMR) discussions proceed through these relevant forums, it will assist us to improve on our legislative and regulatory framework to support efforts of AMR and its use in food and agriculture sector. It will give us an opportunity to have detail discussions on registration, monitoring and control to contribute to Global Data Base Development as per Para 48 of Agenda Item 11.

Chair, Papua New Guinea therefore fully supports the two proposals for reviewing the above mentioned Codex Text (CAC/RCP 61-2005) to fully address the Codex work on antimicrobial resistance.

## **SENEGAL**

Problème: Nous notons les décisions importantes prises par les organes directeurs de la FAO et de l'OMS à savoir:

- i. Le Plan d'action mondial de l'OMS sur la résistance aux antimicrobiens (RAM)
- ii. Résolution de la FAO par rapport aux travaux sur la résistance aux antimicrobiens

Considérant les défis que la RAM présente pour les humains, les animaux et l'environnement, il est important d'avoir coordonné les efforts déployés au niveau national et international pour résoudre les problèmes liés à la RAM. Grâce au soutien de la FAO, de l'OMS et de l'OIE plusieurs stratégies sont mises en place dans la région africaine pour faire face à la menace des RAMs. Un domaine clé est l'élaboration de plans nationaux d'action sur la RAM. Les mesures décisives prises par la FAO et l'OMS contribueraient énormément à fournir une orientation aux pays sur la prévention ou la réduction de la RAM.

En ce qui concerne les recommandations énoncées dans la section 5, paragraphe 49 - Recommandations, voici nos commentaires:

- a. Démarrer une nouvelle activité sur: La révision du Code de pratique pour Minimiser et à maîtriser la résistance aux antimicrobiens (CAC / RCP 61-2005) et
- b. Le développement de l'orientation sur la surveillance intégrée de la résistance aux antimicrobiens;

Position : Nous sommes favorables pour le démarrage de nouveaux travaux sur la révision de la CoP et d'orientation sur la surveillance intégrée de la RAM

Justification: Il y a eu de nouveaux développements dans le domaine de la RAM puisque la norme (CoP) a été développée en 2005 par conséquent une révision aiderait à combler les vides et lacunes observés et d'intégrer ces nouveaux développements pour rendre la norme pertinente dans un domaine où de nouvelles questions émergent rapidement.

#### **ii. Mettre en place un groupe de travail spécifique sur la RAM et d'identifier un pays hôte**

Position: Nous sommes favorables à cette recommandation et nous avons hâte de discuter des termes de référence pour un groupe de travail sur la RAM.

Justification: Nous pensons que compte tenu de la nature mondiale du problème de la RAM et le fait que diverses organisations internationales sont impliquées dans la lutte contre la menace à la RAM, il est prudent d'assurer une consultation plus large sur le TDR pour le Groupe de travail à établir. Cela est nécessaire pour éviter les doubles emplois et de veiller à ce que les efforts mondiaux pour faire face à l'AMR sont complémentaires.

#### **iii. Demander à la FAO / OMS de fournir des avis scientifiques sur la RAM, en collaboration avec l'OIE**

Position : Nous sommes favorables à la demande de la FAO / OMS de fournir des avis scientifiques sur la RAM en collaboration avec l'OIE.

Justification: les normes du Codex doivent être fondées sur des principes scientifiques reflétant les développements actuels. Nous considérons que les questions suivantes clés (annexe III du CX / CAC 16/39/12) pour lesquels des avis scientifiques seraient primordial à la révision du texte existant sur la RAM et l'élaboration de directives sur la surveillance intégrée de la RAM.

- Entreprendre un examen de nouvelles données pertinentes pour le développement et la transmission de la résistance aux antimicrobiens dans la chaîne alimentaire
- En se référant particulièrement aux listes des antimicrobiens d'importance critique de l'OMS et de l'OIE, les LMR du Codex et les informations scientifiques les plus récentes sur la résistance et sa présence dans la chaîne alimentaire
- Fournir des conseils sur les alternatives aux antimicrobiens, en particulier les chaînes de valeur, qui favoriseraient le changement de comportement et d'encourager la mise en œuvre des pratiques visant à répondre RAM, compte tenu du défi à relever par le secteur de l'alimentation et l'agriculture pour changer les pratiques ainsi que de répondre aux besoins alimentaires mondiaux.

#### **iv. Demander la FAO et l'OMS pour élaborer un programme de développement des capacités pour répondre aux besoins identifiés.**

Position : Nous sommes favorables à la recommandation sur la nécessité pour la FAO / OMS d'élaborer des programmes de renforcement des capacités. Les domaines spécifiques d'intérêt qui devraient être traités comprennent, les éléments suivants:

- Connaissance insuffisante et de l'expertise en matière d'analyse des risques de RAM d'origine alimentaire
- Cadre réglementaire sur la RAM faible ou non existant
- Programmes de surveillance et de contrôle nationaux absents ou inefficaces sur l'utilisation des antimicrobiens

### **THAILAND**

Thailand would like to thank Codex for taking consideration our comments previously submitted. We would like to stress our continued commitment to participate in Codex work on antimicrobial resistance (AMR) and to offer all scientific information needed by Codex.

In addition, we definitely agree that the most appropriate mechanism to carry out these works is to re-establish the *ad hoc* Intergovernmental Task Force on AMR (TFAMR) and convene expert meetings from the FAO/WHO/OIE. We consider both the draft terms of reference for TFAMR and the provision of scientific advice on AMR are adequate for the moment to revise the CAC/RCP 61-2005 and to develop the guidance on Integrated Surveillance of AMR.

Regarding the proposed project documents, we generally support Codex to start the new work on the revision of CAC/RCP 61-2005 as well as the development of Guidance on Integrated Surveillance of Antimicrobial Resistance.

Nevertheless, we find it necessary that the control of Active Pharmaceutical Ingredients (APIs) and medicated feed should be included under the scopes of the project document/1, proposal for new work on the revision of CAC/RCP 61-2005, to ensure the new work will cover all aspects related to AMR.

## **HEALTHFORANIMAL**

### **Codex mandate**

Regarding the terms of reference proposed, HealthforAnimals agrees that the current proposal is a good basis for future Codex work. We concur with the revision of the Codex Code of Practice CAC/RCP 61-2005 and appreciate the recommendation to let Member States get more experience in what regards Codex guidelines CAC/GL 77-2011. We would also like to recommend that the revision of the Codex Code of Practice CAC/RCP 61-2005 should take into account OIE Terrestrial Code Chapter 6.9 and other relevant OIE texts.

HealthforAnimals does not consider the WHO list of critically important antimicrobials, a risk assessment of the concerned antimicrobial classes. The WHO list is based on possibility of transmission of AMR and not probability as described in the second selection criterion. Because probability of resistance development is not considered, this list reflects much more a hazard identification exercise than a risk assessment. Codex should stay within its mandate, namely risk analysis principles as part of its decision-making and not get involved in hazard-based concepts. In preparing terms of references, the delegates should be mindful that the WHO Critically Important Antimicrobial list does not reflect a risk ranking or a risk assessment.

Therefore and in light of the tripartite FAO/WHO/OIE collaboration on antimicrobial resistance, the existence of also an OIE critically important list for veterinary medicine, and the One Health approach, it would be very appropriate that also expert advice and additional guidance on the substances listed in the WHO Critically Important Antimicrobial list is developed by FAO and WHO i.e. by Codex jointly with OIE.

### **International Monitoring and Surveillance**

There is great benefit in working on harmonizing the international framework for monitoring and surveillance, however some technical issues and challenges necessitate reflections, namely

- use of global clinical breakpoints, as these are depending on local use conditions,
- use of whole genome sequencing as this detects genotypes not phenotypes.

All Codex work should be within its mandate, therefore *Codex Alimentarius* should concentrate on food borne pathogens sampling and on sharing of microbiological data to improve risk management and risk communication. Due consideration should be taken of the work done by the OIE and other organizations in that regard.

### **Capacity Building**

HealthforAnimals considers that capacity building for surveillance of resistance is beneficial to all stakeholders and supports the efforts of all international organizations in this area.