

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5, 6

CRD7

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

AD HOC CODEX INTERGOVERNMENTAL TASK FORCE ON ANTIMICROBIAL RESISTANCE

Sixth Session

Comments of Ghana

AGENDA ITEM 5

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

DEFINITIONS

- i. **Position:** Ghana proposes the use of the term “plant pathologist” as the professional to address the key risk management measures described in the document in relation to administration or application of medically important

Rationale: A plant pathologist is a professional with skills to manage and control diseases in plants and capable of prescribing the appropriate drugs for use in treatment of plant diseases.

- ii. **Position:** Ghana agrees with the proposed definition of medically important antimicrobials and proposes the deletion of “or national lists, where available”

Medically important antimicrobials: Antimicrobial agents important for therapeutic use in humans as describe in the WHO list of critically important antimicrobials ~~or national lists, where available.~~

Rationale: The inclusion of national lists to the definition may be used inappropriately as a barrier to trade. The use of the term is at variance to the WHO list of critically important antimicrobials and should be backed with sufficient scientific evidence as required in cases of residues or contaminants in food.

INTRODUCTION

1. Scope

Position: Ghana proposes the deletion of the third sentence in paragraph 7 of the scope.

Rationale: The sentence is a repetition of the second sentence of paragraph 7.

2. Definitions

Plant/crop health professional:

Position: Ghana proposes the use of the term “plant pathologist” as the professional to address the key risk management measures described in the document in relation to administration or application of medically important

Rationale: A plant pathologist is a professional with skills to manage and control diseases in plants and capable of prescribing the appropriate drugs for use in treatment of plant diseases

4. General principles to minimize and contain antimicrobial resistance

Position: We support the proposed principles and recommend the deletion of ~~or national lists, where available,~~ in Line 2 of Principle 4.

Rationale: The inclusion of national lists to the definition may be used inappropriately as a barrier to trade. The use of the term is at variance to the OIE and WHO list of critically important antimicrobials and should be backed with sufficient scientific evidence as required in cases of residues or contaminants in food.

5. Responsible and prudent use of antimicrobial agents

Responsibilities of the regulatory authorities

Position: The first sentence on paragraph 13 is misplaced and best fits in the last sentence in paragraph 12.

Rationale: Paragraph 12 describes the responsibility of the regulatory authorities in relation to market authorization while the paragraph 13 deals with collaboration between national governments and other stakeholders.

Assessment of the potential antimicrobial agents to select for resistant microorganisms

Position: Ghana does not support the inclusion of the “national list” in paragraph 17

Rationale: The inclusion of national lists to the definition may be used inappropriately as a barrier to trade. The use of the term is at variance to the WHO list of critically important antimicrobials and should be backed with sufficient scientific evidence as required in cases of residues or contaminants in food.

Distribution of antimicrobial agents

Position: We propose the replacement of plant /crop advisor or consultant with plant pathologist in **paragraph 23**.

Rationale: A plant pathologist is a professional with skills to manage and control diseases in plants and capable of prescribing the appropriate drugs for use in treatment of plant diseases.

Position: Delete ~~appropriately credentialed/~~ in **Line 4 of paragraph 23**.

Position: Ghana proposes the amendment to paragraph 24 as indicated here below:

24. Distribution should be regularly controlled by the regulatory authorities, and **with regular** monitoring of sales of antimicrobial agents ~~could be~~ undertaken and information ~~could be~~ analyzed with appropriate context to identify areas of concern and potential follow up.

Rationale: It is the obligation of the regulatory authority to control and monitor sales of antimicrobial agents.

30. Position: We propose the deletion of “**as resources permit**” from first line.

Rationale: Research work should not be limited by resources. The statement should read “Research should be conducted, ~~as resources permit~~, on antimicrobials, their metabolites”.

41. Position: Ghana proposes that record keeping of antimicrobials supplied should include “**Conditions of storage for manufacturer to user**”

Rationale: Special storage conditions required for many drugs including antimicrobials are adhered to particularly low and middle income countries as well as in the tropics because of erratic power supply. This is evident after manufacturing through transportation, distribution, at wholesale and retail outlets. The potency of many antimicrobials will be affected as a result of improper storage compounding the problem of resistance.

Responsibilities of food producers

Position: Ghana proposes the deletion of the fourth sentence of paragraph 59.

~~“Disease prevention through the use of vaccines, integrated pest management, and other measures that have been clinically proven to be safe and efficacious, such as probiotics (beneficial bacteria found in various foods), prebiotics (non-digestible foods that help probiotic bacteria grow and flourish) or competitive exclusion products (intestinal bacterial flora that limit the colonization of some bacterial pathogens) may be considered and applied wherever appropriate and available.”~~

Rationale: The fourth sentence is a repetition of the third sentence in this paragraph.

AGENDA ITEM 6

PROPOSED DRAFT GUIDELINES ON INTEGRATED MONITORING AND SURVEILLANCE OF FOODBORNE ANTIMICROBIAL RESISTANCE

Definitions

Prioritized antimicrobial agents: Ghana does not support the use of “national list” in the definition

Rationale: The use of “national lists” may be used inappropriately as a barrier to trade. The use of national lists, which is at variance to the OIE and WHO list of critically important antimicrobials, should be backed with sufficient scientific evidence as required in cases of residues or contaminants in food.

6. Regulatory framework and roles

6.2. Other activities

Position: We propose the replacement of the term “Plant health professional” with “plant pathologist”.

Rationale: A plant pathologist is a professional with skills to manage and control diseases in plants and capable of prescribing the appropriate drugs for use in treatment of plant diseases.

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

Position: Ghana supports the application of a stepwise approach provided that it is used in the context of providing a pathway to achieving the objectives of minimizing AMR and not as an inappropriate means to create trade barriers. The revised text has addressed this sufficiently.

Rationale: Tackling the AMR challenge requires multiple actors and strategies, which have a cumulative effect towards achieving the desired outcomes. Focusing these efforts requires a progressive pathway, which can facilitate implementation of these guidelines.

7.3. Options for stepwise development of integrated monitoring and surveillance of foodborne AMR and AMU programs

Position: We take note of the concerns expressed with regard to the application of a stepwise approach and propose that the table should be included as an annex to the guidelines.

Rationale: The table is a good example to countries, which provides an outline of milestones of a progressive pathway for the purposes of these guidelines.

8. Design of monitoring and surveillance programs for AMR

8.7.5. Molecular testing

Position: Ghana suggests the deletion of the seventh paragraph in this sub section

~~.....Countries without current AMR surveillance programs may consider focusing on WGS in developing surveillance programs. Countries taking this approach should do some surveillance using conventional microbiology to monitor for previously undetected resistance genes. WGS approaches to surveillance are particularly suited to data sharing and there are several international initiatives to collect and share WGS data.~~

Rationale: This section is on molecular testing however there is undue emphasis on benefits of whole genome sequencing, which discriminates against other molecular tests. WGS is more economically feasible for well – resourced and developed countries rather than developing countries. There are diagnostic tools which not only allows rapid bacterial identification but also allow effective resistance profiling which may be more suited for low and middle income countries. There are rapid and easy to use and require less logistic infrastructure [Chromogenic tests and Matrix assisted laser desorption/ionization time of flight].