CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

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Agenda Item 5, 6 **CRD9**

ORINGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

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

Sixth Session

Comments of India

Agenda item- 5

General Comments: India appreciates and supports the approach being used in the revision of CoP to Minimize and Contain Antimicrobial Resistance.

Specific Comments:

A. Section 4: General Principles to Minimize and Contain Antimicrobial Resistance

1. Principle 5

Comments: India proposes to modify the principle as below:

"Responsible and prudent administration in food-producing animals does not include the use of **antimicrobial agents for** growth promotion. ~~of antimicrobial agents that are considered medically important or are able to cause cross-resistance to other antimicrobial agents, or classes of antimicrobial agents, that are considered medically important, in the absence of a risk analysis. This risk analysis should:~~

~~• be undertaken by the appropriate national regulatory authority;~~

~~• be based on adequate scientific evidence; and~~

~~• include a publicly available summary. "~~

Rationale: Use of antimicrobial agents for growth promotion in food-producing animals should not be allowed under any circumstances since it leads to unwarranted exposure to low doses of antimicrobials that promotes the evolution of resistance and unnecessarily increase the problem of AMR.

2. Principle 6:

Comment: India proposes to reword the principle 6 as below:

"**For treatment of disease, medically important antimicrobial agents except "highest priority critically important" antimicrobial agents should be used. For control of dissemination of a clinically diagnosed infectious disease identified within a group of animals, or in certain circumstances for research and conservation, only highly important and important classes of medically important antimicrobial agents should be used."**

~~Medically important antimicrobial agents should only be used for therapeutic purposes (treatment, control/metaphylaxis or prevention/prophylaxis of disease); or in certain circumstances for research and conservation.~~

Rationale: In line with "WHO guidelines on use of medically important antimicrobial agents in food-producing animals (2017)".

3. Principle 7:

Comment: India proposes reword principle7 as below:

"Medically important antimicrobial agents should only be used in well-defined circumstances for the prevention/prophylaxis of a clinically diagnosed infectious disease identified within a group of food producing animals. However, medically important antimicrobial agents should

not be used for prevention of infectious diseases in food producing animals that have not yet been clinically diagnosed."

~~Medically important antimicrobial agents should only be used in well-defined circumstances for the prevention/prophylaxis of a specific disease risk and follow appropriate professional oversight, dose, and duration.~~

Rationale: In line with "WHO guidelines on use of medically important antimicrobial agents in food-producing animals (2017)".

B. Section: Advertising: paragraph 36

4. **Comment:** India proposes to replace the word "discouraged" with "avoided"

C. Section: Responsibilities of wholesale and retail distributors: paragraph 40

5. **Comment:** India proposes to modify the sentence as below:

"Wholesalers and retailers distributing medically important antimicrobial agents should only do so on the prescription of a veterinarian or other suitably **qualified and** trained person authorized in accordance with national legislation and all products should be appropriately labelled."

D. Section: OFF-LABEL USE

6. **Comment:** India proposes following text:

"For food-producing animals**,** the off-label use of a veterinary antimicrobial drug may be permitted in **unavoidable** ~~appropriate~~ circumstances and should be in agreement with the national legislation in force including the administrative withdrawal periods to be used. It is the veterinarian's responsibility to define the conditions of responsible use in such a case including the therapeutic regimen, the route of administration, and the duration of the treatment. ~~Off-label use of medically important antimicrobial agents as growth promoters should not be permitted.~~"

Rationale: In line with our comments provided earlier for use of antimicrobial agents for growth promotion. Besides, in our opinion use of antimicrobial agents for any purpose other than treatment/preventions of a disease (e.g. growth promotion) should not be categorised as off label use.

E. Section: Responsibilities of food producers

7. **Comment:** India proposes to add following responsibility:

- **Not to use antimicrobial agents as growth promoters in food-producing animals.**

F. Section: Communication to consumers

8. **Comment**: Committee may like to consider the report of the WHO survey "WHO, 2015. Antibiotic resistance: Multi-country public awareness survey" in respect of the use of the terms antibiotic resistance and antimicrobial resistance in the context of public communication.

Reference: WHO, 2015. Antibiotic resistance: Multi-country public awareness survey. Available at http://apps.who.int/medicinedocs/documents/s22245en/s22245en.pdf

Agenda item- 6

General Comment

Surveillance of antimicrobial residues in food (derived from animal and crops) is an important component of integrated monitoring and surveillance programs on antimicrobial resistance (AMR), and should be incorporated as part of the proposed draft guidelines.

Rationale

- Monitoring the presence of antimicrobial residues in food is mandated across many countries, as an important surveillance tool from point of view of food safety. It will therefore provide useful information to complement information derived from monitoring or surveillance of antimicrobial sale and use data in animals and crops.
- It has often been recognized that monitoring the presence of antimicrobial residues is expensive and involves use of high-end analytical procedures and trained expertise. Despite this, when planned and executed well, it will help understand:

- Kind of antibiotics which are being used in practice on the ground, thereby enabling traceability of antimicrobials
- Trends on any unapproved antimicrobial use happening in practice
- Whether withdrawal periods have been appropriately followed or not
- Role of the residual antimicrobial in the food in imparting drug resistance to gut bacteria through directly acquired resistance or horizontal transfer mechanisms.

Specific Comments:

Section 3: Definitions

Following definitions should also be included:

Antimicrobial resistance (AMR): The ability of a microorganism to multiply or persist in the presence of an increased level of an antimicrobial agent relative to the susceptible counterpart of the same species

Anti-microbial resistant determinant: The genetic element(s) encoding for the ability of microorganisms to withstand the effect of an antimicrobial agent. They are located either chromosomally or extra chromosomally and may be associated with mobile genetic elements such as plasmids, integrons, or transposons, thereby enabling horizontal transmission form resistant to susceptible strains

Food borne pathogen: A pathogen presents in food, which may cause human disease(s) or illness through consumption of food contaminated with the pathogen and /or the biological products produced by the pathogen

Food Producing animals:Animals raised for the purpose of providing food to humans

Monitoring: The systematic, regular measurement, collation, validation, analysis and interpretation of antimicrobial resistance and antimicrobial use along the food chain related data from defined populations when these activities are not associated with a pre-defined risk mitigation plan or activity.

Surveillance:The systematic, continuous or ongoing measurement, collection, collation, analysis, interpretation of antimicrobial resistance and antimicrobial use along food chain related data from defined populations when these activities are associated with a pre-defined risk mitigation plan or activity.