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The U.S. strongly recommends that reference to the WHO Global Action Plan (GAP) rather than a vague reference to international organizations is most appropriate as the GAP went through Member State review. There are documents arising from international organizations in non-transparent expert groups without Member State input that do not have international agreement. In addition, the paragraph as written implies that antimicrobial use is the only source of antimicrobial resistance. Antimicrobial use in food animals is only one potential factor that could contribute to development and spread of antimicrobial resistance. Use in humans contributing to ill food handlers and contamination, lack of sanitation, and proper hygiene aspects of food safety are also important factors for preventing spread of AMR. The new text, which is reflective of the one health approach endorsed by international organizations, is taken from the WHO GAP 5 goals ([https://apps.who.int/iris/bitstream/handle/10665/193736/9789241509763\\_eng.pdf?sequence=1](https://apps.who.int/iris/bitstream/handle/10665/193736/9789241509763_eng.pdf?sequence=1) ). References to CAC/RCP61 2005 will quickly outdate the document as the Codex Task Force on Antimicrobial Resistance is currently updating the document. Reference to CAC/GL77-2011 is most appropriate. In addition, Codex is currently developing guidelines in this area. Could reference work of the Codex Task force on Antimicrobial Resistance.

**Page 25: [2] Commented [USG86] USG 2/4/2020 7:32:00 AM**

In the U.S., the empirical evidence on the effectiveness of policy to eliminate food deserts and food swamps shows that in most cases these policies are expensive and do not have the intended effect, particularly policies that focus on creation or elimination of physical stores/restaurants (we include references to some of this evidence in the attached annotated bibliography). Our edits recognize that such policies can only succeed if stores or e-commerce options are convenient for consumers to use and economically viable.

**Page 25: [3] Commented [USG89] USG 2/4/2020 7:58:00 AM**

The U.S. strongly advises that the CFS is not the appropriate venue to negotiate trade policy. Possible replacement text: ""States should improve the availability and access of food through the transparent development and enforcement of risk-based sanitary and phytosanitary requirements to facilitate trade in agricultural products.""

**Page 25: [4] Commented [USG90] USG 2/4/2020 8:01:00 AM**

It would be more relevant to refer to "improving diet diversity" through transfers, rather than referring to substituting staples. Recommend current edit or removing sentence entirely. We assume that in most cases it's not about a food basket being "provided" to poor households but improving access of poor households to an improved/more diverse diet, through a supplemental transfer (whether cash, voucher, or in-kind).

2) Language re substituting staple foods with others makes assumption on the goals of food/voucher programs which can vary widely