CODEX ALIMENTARIUS COMMISSION

Food and Agriculture Organization of the United Nations

World Health Organization

Viale delle Terme di Caracalla, 00153 Rome, Italy - Tel: (+39) 06 57051 - E-mail: codex@fao.org - www.codexalimentarius.org

**Agenda Item 4 and 5** **CRD4**

**Original Language Only**

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME**
**AD HOC CODEX INTERGOVERNMENTAL TASK FORCE ON ANTIMICROBIAL RESISTANCE**
**Fifth Session**

# AGENDA ITEM 4: PROPOSED DRAFT REVISION OF THE *CODE OF PRACTICE TO MINIMIZE AND CONTAIN ANTIMICROBIAL RESISTANCE* (CAC/RCP 61-2005)

*Comments of India*

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

**Specific Comments:**

**Section: Definition**

1. **Therapeutic use:** India proposes to delete “prevention/prophylaxis of disease” from the definition of “Therapeutic use” and hence, the revised text of the this definition will be read as”

*“Administration of antimicrobial agents for the treatment and control/metaphylaxis”*

**Rationale:** The term therapeutic should be referred to treatment and control but not to prevention of diseases.

2. **One health:** The definition of “one health” should be replaced with “one health approach” as the later is being used in the document and should be read as:

“*An internationally-recognised approach to designing and implementing programmes, policies, legislation and research on AMR in which multiple sectors communicate and work together to achieve better public health outcomes (WHO reference)”*

**Section: General Principles to Minimize and Contain Antimicrobial Resistance**

3. **Principle 6:** India proposes to delete “or prevention/prophylaxis of disease” from the principle.

**Rationale:** Medically important antimicrobial agents should be used for treatment and not for prevention.

4. **Principle 7:** India is the view that the well-defined circumstances should be elaborated to some extent to bring better clarity in the text and also proposes following modification:

"Antimicrobial agents **except medically important antimicrobial agents** should only be used in well-defined circumstances for the prevention of a specific disease and follow appropriate oversight, dose, and duration"

Further, India suggests to consider **"withdrawal period"** along with "appropriate oversight, dose, and duration" in the principle.

**Section: OFF-LABEL USE**

5. India proposes following text:

**For food-producing animals,** the off-label use of a veterinary antimicrobial drug may be permitted in **exceptional** 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 **antimicrobial agents as** growth promoters should not be permitted.

## AGENDA ITEM 5: PROPOSED DRAFT GUIDELINES ON *INTEGRATED SURVEILLANCE OF ANTIMICROBIAL RESISTANCE*

*Comments of India*

**General Comment:** India appreciates and supports the work of EWG in development of these guidelines. However, India has following specific comments to offer:

**Specific Comments:**

**Section 1: Introduction**

1. India suggests to add the term "Crop" in paragraph 2 as:

"..... data on the use of antimicrobials (AM) in humans, animals and **crops**, is an essential component of a comprehensive national food safety system."

**Section 4: Scope**

AMs used as biocides, including disinfectants should be included in the scope of these guidelines.

**Rationale:** It is known that biocides are also responsible for development of AMR and biocide treated containers/surfaces comes in direct food contact may be responsible for it.

**Section 5: Definitions**

2. 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) encodingfor 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

3. **Definitions** of Monitoring and Surveillance of antimicrobial resistance should be modified as:

**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.

**4. Section10.1.3: Risk Profile**

Editorial Change: bullet no 4 and 11 are repetitive, therefore, one bullet may be deleted.

**5. Section 10.7: Laboratories**

India proposes to delete the term “both” from bullet 4.

**Rationale:** Since phenotypic or genotypic or both could be used as validated methods for antimicrobial susceptibility testing.

6. India proposes to include section on **Surveillance of national antimicrobial sales data for use in Crops**

**Rational:** The scope of these guidelines cover the design and implementation of an integrated monitoring and surveillance program for AMR and antimicrobial use (AMU) along the food chain, including animals and **crops,** however, surveillance for AMR and AMU in crops is not covered in the document. India’s view is annexed at annexure 1.

**Annex-1**

There are around 40 antibiotics which have been screened to control plant disease with following requirements:

(ii) be active on or inside of the plant
(iii) tolerate oxidation, UV irradiation, rainfall, and high temperatures
(iv) be safe to plants

Out of the 40 antibiotics compounds, fewer than 10 are used commercially and only streptomycin has significantly been used worldwide.

Other Antibiotics which are used to control plant disease are:-

- Penicillin
- Aureomycin
- Chloramphenicol
- Oxytetracycline

These antibiotics are sprayed onto fruit trees to prevent and treat infection. Traces of antibiotics that remain after the initial spraying may encourage emergence of resistant strains of bacteria.

During spraying, the wind can spread low concentrations of the antibiotic further to a field, possibly increasing the risk of resistant bacteria. In both cases, it is possible for antibiotic resistant bacteria to enter into the food chain, ultimately reaching humans. If large amounts of antibiotic resistant bacteria are present in agricultural soil then it may be spread into the food chain.