

# 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](mailto:codex@fao.org) - [www.codexalimentarius.org](http://www.codexalimentarius.org)

Agenda Item 5.6

CRD16

ORIGINAL LANGUAGE ONLY

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

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

#### Seventh Session

#### Comments of Nigeria)

Agenda Items 5 **Code of Practice to Minimize and contain Foodborne Antimicrobial Resistance -**  
(CX/AMR 19/7/5)

Nigeria commends the EWG for a good job done in redrafting this document, however we propose the following;

1. Page 12; Paragraph 6; Sub-bullet 4: *The word "Regional" is adopted.*
2. Page 14; Definition of Food Production Environment: *Nigeria recommends that there is need to include a comment to re-address how to measure the word "reasonable".*
3. Page 14; Definition of Medically Important Antimicrobials; line 4: The word "Regional" should be introduced to read "National/Regional".
4. Page 15; Definition of Therapeutic Use: *Nigeria is of the opinion that the word "and" should be introduced to read "and/or".*
5. Page 15; Definition of Plant/ Crop Health Professional: *Nigeria requests for clarification on what the phrase "Current Training" means.*
6. Page 17; Assessment of the Potential Antimicrobial Agents to Select for Resistant Microorganisms; Paragraph 21; line 4: Nigeria proposes that *the word "Regional" is added to read "National/ Regional lists". More clarification should be sought why "veterinary" was not included.*
7. Page 18; Distribution of Antimicrobial Agents; Paragraph 27; Line 3: Nigeria proposes that *the word "Veterinary" should be added to read "Medically and Veterinary Important Antimicrobials".*
8. Page 19; Training on Issues related to Antimicrobial Resistance and the Responsible Use of Antimicrobial Agents; Paragraph 32; Line 6: Nigeria suggests that *the phrase "and other relevant Stakeholders" should be added at the end of the last sentence.*
9. Page 21; Paragraph 41; Line 3: Nigeria suggests that *the word "Producers" should be replaced with "Users".*
10. Page 21; Paragraph 47: Nigeria suggests that *the "Manufacturer's Name and Address" should be added to the bullet points.*
11. Page 22; Paragraph 51; Bullet point 2; Line 1: Nigeria suggests that *the phrase "If feasible" should be deleted and the phrase "unless otherwise indicated by the Prescriber" should be added at the end of the sentence.*
12. Page 24; Record Keeping and Recording; Paragraph 58; Line 2: Nigeria agreed that *the word "Administration" should remain.*

Agenda Item 6 **Proposed Draft Guidelines on Integrated Monitoring and Surveillance of Foodborne Antimicrobial Resistance -** (CX/AMR 19/7/6)

Nigeria commends the EWG for a good job done especially with drafting this guidelines, however our comments are as follows;

Page 9; Figure 1 (Diagram): Nigeria proposes that *"Situation Analysis" should be added under Preliminary Activities and "Residues" should be included in the diagram beside AMU.*

Page 11; Section 7.2; Paragraph 46: Nigeria proposes that *"Residue" should be included.*

Page 11; Section 7.2.1; Antimicrobial Resistance Program B; Sampling Sources and Stages in the Food Chain; Paragraph 50: Nigeria recommends that including the word *"Feed"* is important and should now read *"Food/Feed"*.

Page 12; Section 7.2.2 B; Reporting; Paragraph 63; Bullet 2; Sub-Bullet 1; Line 1: Nigeria suggests that the word "Biomass" should be added to read "Adjusted by the Estimated Animal Biomass and Population..."

Page 17; Section 8.5; Target Microorganisms and Resistance Determinants; *Paragraph 86-92: Nigeria will prioritize the list.*

Page 21; Section 9.2; Reporting of the National Antimicrobial Sales/Use Data for use in Animals: Nigeria observed that *this is a repetition of the Reporting on Page 12; Paragraph 63 and it is too bulky, hence needs to be trimmed down.*

Page 24; Section 11; Paragraph 154: Nigeria observed that "*Monitoring and Evaluation*" is missing from the entire document.

Page 24; Section 12; Risk Communication: Nigeria is of the opinion that "*Risk Analysis and Reporting*" on *Figure 1 should be replaced with "Risk Assessment" which is a broader term that also covers "Risk Communication"*.