

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of
the United Nations



World Health
Organization

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Agenda Item 5

CX/CAC 10/33/4-Add.2

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

CODEX ALIMENTARIUS COMMISSION

*Thirty-third Session,
Geneva, Switzerland, 5 - 9 July 2010*

COMMENTS ON PROPOSED DRAFT STANDARDS AND RELATED TEXTS SUBMITTED AT STEP 5

(Comments submitted by 23 June 2010)

CODEX COMMITTEE ON FISH AND FISHERY PRODUCTS COMITÉ DU CODEX SUR LES POISSONS ET LES PRODUITS DE LA PECHE COMITÉ DEL CODEX SOBRE PESCADO Y PRODUCTOS PESQUEROS

**Proposed Draft Standard for Smoked-Fish, Smoke-Flavoured Fish and Smoke-Dried Fish
(ALINORM 10/33/18, APPENDIX VI)**

Comments of Ghana

GHANA

Ghana supports the adoption of the following document at Step 5:

Proposed Draft Standard for Smoked Fish, Smoke-Flavoured Fish and Smoke-Dried Fish at Step 5

Rationale: Ghana supports the adoption of the Draft Standard for Smoked Fish, Smoked-Flavoured Fish and Smoke-Dried Fish in view of the increasing trade in these products. We believe the standard would help support efforts to mitigate public health concerns that may be associated with these products.

AD HOC CODEX INTERGOVERNMENTAL TASK FORCE ON ANTIMICROBIAL RESISTANCE GROUPE INTERGOUVERNEMENT SPECIAL DU CODEX SUR LA RESISTANCE AUX ANTIMICROBIENS GRUPO DE ACCION INTERGUBERNAMENTAL ESPECIAL DEL CODEX SOBRE LA RESISTENCIA A LOS ANTIMICROBIANOS

**Proposed Draft Guidelines for Risk Analysis of Foodborne Antimicrobial Resistance (N01-2008, N02-2008,
N03-2008) (ALINORM 10/33/42, APPENDIX II)**

Comments of Australia

AUSTRALIA

i) General comments

Australia complements the task force on the progress made in revising the documents and supports progress of the draft document to Step 5. We do not have major comments. No attempt has been made to provide extensive comments of an editorial nature. A few minor editorial comments and proposed clarifications are outlined below.

ii) Specific comments

The following suggestion is made to assist in understanding the scope of the document.

Page 32

SCOPE

7. The scope of these guidelines is to provide science-based guidance on methodology and processes for risk analysis and its application to foodborne AMR related to non-human use of antimicrobial agents. ~~The intent of the guidelines aim is to assess the risks to human health associated with the presence in food and feed, including aquaculture, and the transmission through food and feed, of AMR microorganisms and antimicrobial resistance determinants, by~~ **arising from the use of antimicrobial agents in animals, plants and food processing, leading to AMR transmission through food and feed (including aquaculture), and** ~~to developing~~ advice on risk management activities to reduce such risks. ~~The guidelines will further address the risks associated with different areas of such as veterinary applications, plant protection applications or food processing.~~

Rationale: To improve the clarity of the text

The following suggestion is made to assist improve readability.

Page 32

Adverse Health Effect – An undesirable or unwanted outcome in humans. In this document,

this refers to the human infections ~~or their frequency~~ caused by AMR microorganisms and antimicrobial resistance determinants in food or acquired from food of animal/plant origin as well as ~~the~~ increased frequency of infections and treatment failures, loss of treatment options, and increased severity of infections manifested by prolonged duration of disease, increased hospitalization, and increased mortality⁷.

Rationale: To remove redundancy in the text, frequency is mentioned twice

The following minor editorial is suggested.

Page 35 Paragraph 15

- Description of usage (extent and nature) of the antimicrobial agent(s) in food production, when available (such as veterinary applications, aquaculture **uses**, plant protection or food processing);

Rationale: A qualifier is required for aquaculture to make for the sentence to make sense

The following suggestion is made to improve readability.

Page 36 Paragraph 21

Establishment of risk assessment policy

21. ~~Following a decision as to the need for a risk assessment,~~ **R**isk assessment policy should be established by risk managers in advance of **any** risk assessment. The risk assessment policy should be developed in consultation with risk assessors and all other interested parties.

Rationale: To improve the clarity of the text

The paragraphs numbers referred to are now 69-72.

Page 36 Paragraph 26

26. Possible sources of information:

- Surveillance programs (*see paras 69-72 83-86*);

Rationale: To update the numbering for the paragraphs referenced

The appendix number needs revising in the new draft.

Page 40 Paragraph 43

43. Appendix ~~2~~ **3** provides examples of the outputs from a qualitative foodborne AMR-risk assessment. The Appendix is not intended to imply that a qualitative AMR-risk assessment is the preferred approach, but

merely to illustrate ways in which qualitative findings can be presented. Quantitative risk assessments can be divided into two types – deterministic or probabilistic – which will have different forms of output¹³.

Rationale: To update the appendix number

A sentence has been split in two with a bullet

Page 48 Appendix 1 Paragraph 6

6. Other Relevant Information

- What is the evidence of a relationship between the presence of the AMR microorganisms or antimicrobial resistance determinants on the food commodity and the occurrence of the adverse health effect(s) in humans?
- What is the evidence of a relationship between the use of the antimicrobial agent and the occurrence of AMR microorganisms, or antimicrobial resistance determinants, in the food commodity of concern?

Rationale: To rejoin a sentence accidentally split by a bullet

The following suggestion is made to assist improve readability.

Page 49 Appendix 2 Paragraph 2.1

2.1 Pre-harvest factors affecting prevalence of hazard on-farm

- Resistance selection pressure:
 - o Attributes of antimicrobial use at the population level:
 - Number of animals or extent of crops exposed to the antimicrobial agent in the defined time period

Rationale: To improve the English animals and crops need to be plural

**CODEX COMMITTEE ON FOOD LABELLING
COMITÉ DU CODEX SUR L'ÉTIQUETAGE DES DENRÉES
COMITÉ DEL CODEX SOBRE ETIQUETADO DE LOS ALIMENTOS**

Proposed draft revision of the *Guidelines on Nutrition Labelling* (CAC/GL 2-1985) concerning the list of nutrients that are always declared on a voluntary or mandatory basis (ALINORM 10/33/22, APPENDIX II)

PHILIPPINES

The Philippines supports the adoption of the draft standard.