

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 5 and 6

CRD09

ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

AD HOC CODEX INTERGOVERNMENTAL TASK FORCE ON ANTIMICROBIAL RESISTANCE

Seventh Session

Comments of India

Agenda item 5

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 use of antimicrobial agents does not include the use of antimicrobial agents for growth promotion ~~that are considered medically important. Antimicrobial agents that are not considered medically important should not be used for growth promotion unless potential risks to human health have been evaluated through procedures consistent with the Guidelines for Risk Analysis of Foodborne Antimicrobial Resistance CXG 77-2011.:~~

- ~~• considered medically important; or~~
- ~~• able to cause cross- or co-resistance to antimicrobial agents that are considered medical important.~~

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 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 5.5: Responsibilities of food animal and plant/crop producers

4. Comment: India proposes to add following responsibility:

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

Agenda item 6**Section 3: Definitions**

Comment: India proposes to include following definitions since these terms are used widely in the document:

- (a) 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
- (b) 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
- (c) Food Producing animals: Animals raised for the purpose of providing food to humans