

# CODEX ALIMENTARIUS COMMISSION



Food and Agriculture  
Organization of the  
United Nations



World Health  
Organization

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Agenda Item 5 and 6

CRD15

ORIGINAL LANGUAGE ONLY

## JOINT FAO/WHO FOOD STANDARDS PROGRAMME

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

#### Seventh Session

#### Comments of Indonesia

#### **Agenda Item 5: Proposed Draft Revision of the Code of Practice to Minimize and Contain Foodborne Antimicrobial Resistance (CXC 61-2005)**

Indonesia thanks to USA, China, Chile, Kenya and UK for preparing the paper and chairing/co-chairing electronic working group, and would like to give some comments:

#### 1. Introduction

##### a. Para 4 :

Indonesia agreed that the use of veterinary drugs becomes part of national regulatory food safety assurance.

##### b. Para 5 :

Indonesia would like to seek clarification whether there are arrangements regarding the appropriate use of antimicrobials that can be used as an international reference.

##### c. Para 6 :

Indonesia would like to clarify whether Codex has considered the use “and” at bullet 4, since perhaps there are lists of antimicrobials which are contradictive between one list and another list.

#### 2. Scope

##### a. Para 9 :

Indonesia supported the replacement of the term “food of animal origin” with “plant/crop production” and delete the word “feed”, as “feed” is already covered in the term “plant/crop production”.

##### b. Para 11 :

Indonesia agreed for adoption of both the initial bracketed text and the additional text.

##### c. Para 12 :

Indonesia agreed to add “non-food plants/crops” as they are outside the scope of the document.

#### 3. Definitions

##### a. Adverse health impact

Indonesia supported the elimination of the word “of animal/crop origin” as the term “food” itself is already covered both food origins.

##### b. Competent Authority(ies)

Indonesia supported to replace the terminology of “Regulatory Authority(ies)” with “Competent Authority(ies).”

##### c. Food chain

Indonesia agreed to add the word “feed” in this definition for completeness.

##### d. Plant/crop health professional

Indonesia would like to seek clarification regarding this new definition whether the competence and responsibility of this profession is same as veterinarian.

#### 4. Principles on AMR Risk Management (generally)

a. Principle 9

Indonesia agreed to adopt and revise the principle 9 with addition OIE and IPPC standards as references.

b. Principle 12

In Indonesia, there is no “plant/crop health professional”, therefore we would like to seek clarification regarding this terminology, including the scope, responsibilities and competencies.

c. Principle 7

Again, since in Indonesia there is no “plant/crop health professional”, Indonesia would like to seek clarification what considerations for professional in determination the dose and the duration of antimicrobial in plant/crop are.

d. Principle on surveillance of antimicrobial resistance and use

In principle Indonesia agreed to conduct surveillance of AMR in plants/crops. However, we need guidance to conduct this activity and it should be defined who will responsible for the surveillance.

5. Responsible and prudent use of antimicrobial agents

a. Para 13

Indonesia supported to add the list of veterinary antimicrobials from OIE.

b. Para 14

Indonesia agreed to adopt the revised text that replaces the reference to VICH with “internationally harmonized guidelines”.

5.1 Responsibilities of the competent authorities

- Assessment of the potential antimicrobial agents to select for resistant microorganisms

Para 21:

Indonesia would like to seek clarification whether Codex has considered the potentially contradictive antimicrobial agents lists, for instance the list covered in WHO and OIE.

- Establishment of a summary of product characteristics for each antimicrobial agent

Para 23:

Indonesia proposed to revise the paragraph to be generalized, so that it could include plant/crop protection products by removing “veterinary medicinal”.

- Surveillance and monitoring programs

Para 24:

Indonesia proposed to take into account the guideline of WHO and OIE in integrated monitoring and surveillance system development.

- Knowledge gaps and research

Para 33 :

Indonesia agreed to define the term “agricultural chemical use”.

Para 34 :

Indonesia agreed to revise the text.

5.2 Responsibilities of manufacturers and marketing authorization holders

- Research

Para 45 :

Indonesia agreed to revise the text with replacement the term “should be performed” with “are encourage”.

5.3 -

5.4 Responsibilities of veterinarians and plant/crop health professionals

Para 51 :

Indonesia would like to request the explanation of plant/crop health professional regarding its competence quality, responsibilities and ethics as well as skills.

Para 53 :

Indonesia proposed to delete the last two sentences “alternatives to medically important antimicrobials.....and follow appropriate professional oversight, dose, and duration.

#### **Agenda Item 6: Proposed Draft Guidelines on Integrated Monitoring and Surveillance of Foodborne Antimicrobial Resistance**

Indonesia thanks to the Netherlands, Chile, China and New Zealand for preparing the document, and would like to give some comments:

##### 1. Introduction and purpose

Para 3 :

Indonesia proposed to keep the current wording “scientific evidence” in this paragraph.

Para 6 :

Indonesia agreed to delete the word “comprehensive” from this paragraph.

##### 2. Scope

Para 13 :

Indonesia agreed to delete the term “including animals and crops”, as the scope should be generalized with the term “food chain”. Besides that, it is necessary to define the term “food production environment” and it should be harmonized with COP document

##### 3. Definitions

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##### 4. Principles

Para 19 :

Indonesia agreed with the revised text made by EWG.

Para 32 :

Indonesia supported the scheme of progressive approach to the design and implementation of the integrated monitoring and surveillance system for foodborne AMR made by EWG.