

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
United Nations



World Health
Organization

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Agenda Item 5, 6

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ORIGINAL LANGUAGE ONLY

JOINT FAO/WHO FOOD STANDARDS PROGRAMME

AD HOC CODEX INTERGOVERNMENTAL TASK FORCE ON ANTIMICROBIAL RESISTANCE

Eighth Session

Comments of Nigeria

Agenda Items 5 **Code of Practice to Minimize and contain Foodborne Antimicrobial Resistance - (CX/AMR 21/8/5)**

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

1. Section 3, Definitions

Nigeria supports the retention of the definition of *“Therapeutic Use”* in section 3 of the COP document but proposes that the words *“prevention/prophylaxis”* should be deleted from the current definition.

Rationale: This is because retaining *“prevention/prophylaxis”* in the current definition will promote the abuse and misuse of antimicrobials in plants / crop production especially vegetables and in food-producing animals for growth promotion purposes. Nigeria discourages the use of antimicrobial agents for prevention purposes and advocates that other preventive measures such as good agricultural practices, good biosecurity measures, vaccination, and the use of enzymes and probiotics be explored.

Nigeria thus proposes that the definition should be revised as follows; ***“Therapeutic use: Administration or application of antimicrobial agents for the treatment and control/metaphylaxis of disease”***.

2. Principle 13

Nigeria proposes to merge principles 8 and 13 as well as delete the bracketed section of principle 13 (treatment, control/metaphylaxis or prevention/prophylaxis of disease) and further recommends the following amendments;

“Medically important antimicrobial agents should only be used for therapeutic purposes and should be prescribed, administered, or applied only by, or under the direction of, veterinarians, plant/crop health professionals, or other suitably trained persons authorized in accordance with national legislation.”

Rationale: This is because principle 13 must be qualified in order to provide clarity as well as professional oversight on the specific circumstances that medically important antimicrobials should be used.

3. Section 5, paragraph 24, last bullet

Nigeria recommends amendment of paragraph 24 last bullet by adding the words *“and shelf life”* as follows: ***‘Storage conditions and shelf life’***.

Rationale: International requirements for the establishment of a Summary of Product Characteristics for veterinary medicinal products (VMPs) requires an indication of shelf life where applicable, after reconstitution or after first time opening of immediate package”. Additionally, expired antimicrobial agents may lose some potency contributing to resistance when administered. The COP document addresses antimicrobial resistance and thus its inclusion is necessary.

Agenda Item 6 Proposed Draft Guidelines on Integrated Monitoring and Surveillance of Foodborne Antimicrobial Resistance - (CX/AMR 21/8/6)

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

1. Section 1, Introduction and purpose

Nigeria proposes rearrangement of the paragraphs in this section as follows; Paragraphs 1, 3, 2, 4, 5, 10, 6, 11,7, 8, 9, 12, and 13.

Rationale: This is necessary for ease of reading and paragraph coherence

2. Section 7, Paragraph 29

Nigeria proposes the addition of the word "improvement" after the word "continuous" in the second sentence for the sentence to read as follows; "The concept of continuous **improvement** allows countries to carry out activities to progress according to country-specific objectives, priorities, infrastructure,".

Rationale: Omission of a word and minor edit.

3. Section 8.3, Paragraph 53: Food producing animals

Nigeria proposes the deletion of "faecal samples from pen floors or crate" in the second sub-bullet under Food producing animals in paragraph 53 and recommends the following revision: "At lairage, the sample may include rectal samples or swabs".

Rationale: This is because faecal samples from pen floors or crates would most likely pick up other contaminants from such environment that are not related to the animal being sampled hence misleading the risk assessors and managers.

4. Section 9: Subsection 9.3 Collection and reporting

Nigeria recommends the revision of this subsection by:

- i. Deleting the numerator and the denominator in paragraphs 90 and 92.
- ii. Merge para 89 and 90 as follows; "**The data collection should cover antimicrobial quantities representing the amount of antimicrobial agents sold or used. This is normally expressed as weight in kilograms of the antimicrobials active ingredient, which was sold or used in the monitoring and surveillance period. In some cases, this may be based on estimates**".
- iii. Delete para 91
- iv. Revise para 92 by deleting the second sentence to read as follows:
"The data collection should cover the total food-producing animal population or plant/crop area or quantities harvested that may be exposed to the antimicrobials reported during the monitoring and surveillance period."
- v. Retain para 93, 94, 95 and 97
- vi. Revise para 96 as follows "**For plants/crops the information shall be guided by the relevant IPPC standards**".

5. Section 10.2 Analysis of Result, Paragraph 102

Nigeria proposes that the words "may be" analyzed be replaced with "when" analyzed and "to then" replaced with "would".

The paragraph can now read thus: "The data from the integrated monitoring and surveillance program(s) **when** analyzed as described in CXG 77-2011 for risk assessment **would** inform the development and implementation of risk management options and policies to drive responsible and prudent use of antimicrobials to address foodborne AMR".

Rationale: This encourages that the analyses of results are carried out without any delays hence providing insight into the risk management options to adopt.