

# 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

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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 Morocco

#### **AGENDA ITEM 5: Proposed draft revision of the code of practice to minimize and contain foodborne antimicrobial resistance (CXC 61-2005) (CX/AMR/8/5) at Step 7**

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##### **Section 3, Definitions:**

"[Therapeutic use: Administration or application of antimicrobial agents for the treatment, control/metaphylaxis or prevention/prophylaxis of disease.]"

Morocco supports retention of the definition of therapeutic use in section 3 of the document by adding a footnote specifying the need for **supervision of prophylactic use**.

##### **Rational:**

- 1- The term provides a clear distinction between responsible and prudent uses of medically important antimicrobials – that is for addressing conditions of disease and assuring the health of animals – as opposed to uses for improving animal production – that is for weight gain and feed efficiency;
- 2- The term aligns with the definition of "veterinary medical use" in OIE that includes treatment, control and prevention of disease;
- 3- The definition provides clarity in the rest of the document where the term or related terms are used.

##### **Section 4, General principles to minimize and contain foodborne antimicrobial resistance**

##### **Principle 13:**

Morocco supports the proposal to merge principles 8 and 13 and further recommends the following amendments to delete the bracketed section of principle 13 (treatment, control/metaphylaxis or prevention/prophylaxis of disease) as follows:

"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."

**Rational:** 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.

##### **Section 5, paragraph 24, last bullet:**

Morocco recommends amendment of para 24 last bullet by adding the words "**and shelf Life**" as follows: 'Storage conditions and shelf life'.

##### **Rational:**

1. 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" ;
2. Expired antimicrobial agents may lose some potency contributing to resistance when administered. The COP document addresses antimicrobial resistance and thus its inclusion is necessary.

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**AGENDA ITEM 6: PROPOSED DRAFT GUIDELINES ON INTEGRATED MONITORING AND SURVEILLANCE OF FOODBORNE ANTIMICROBIAL RESISTANCE (CX/AMR 19/7/6)**

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**Section 1, Introduction:**

For a better consistency of the paragraphs, Morocco proposes the reorganization of the paragraphs of this section as follows: Paragraphs 1, 3, 2, 4, 5, 10, 6, 11, 7, 8, 9, 12 and 13.

**Section 7, Paragraph 29:**

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

**Rational:** Editorial modification of the English version of the document without repercussions on the French version.

**Section 9, Sub section 9.3 Collection and reporting:**

Morocco recommend the revision of this sub section by:

- 1- Deleting the numerator and the denominator;
- 2- 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 the 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";
- 3- Delete para 91;
- 4- 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."

- 5- Retain para 93, 94, 95 and 97;
- 6- Revise para 96 as follows "For plants/crops the information shall be guided by the relevant IPPC standard".

**Rationale:**

The OIE codes are clear and detailed on monitoring use and sales of antimicrobials for veterinary medicinal use. Therefore paras 95 and 97 should be retained. The concept of biomass calculation is a work in progress at the OIE and these guidelines will be more effectively used when this work is completed. This will also ensure that there is no conflict with what the OIE standard requires and the GLIS document.

The use data for plant/crops should be guided by the relevant international standard setting body (IPPC). Currently no guidance from IPPC and it is advised notto include guidance on Plant/crops at this moment.