In response to Codex Circular Letter 2005/33-CAC “Request for comments on Codex work on antimicrobial resistance”, the European Community and its 25 Member States are pleased to offer the following comments.

(a) Comments on the proposal attached in Annex I (to CL 2005/33-CAC) for new Codex work on antimicrobial resistance

General Comments

- The European Community and its Member States support the establishment of an *ad hoc* Intergovernmental Task Force on Antimicrobial Resistance.
- This new work should begin as soon as possible.

Specific Comments

- **B. Scope:**
  - The European Community and its Member States would like to include the option of taking into account the work carried out by regional economic integration organisations. This could be addressed with the following change at the end of the first paragraph under “B. Scope”:
    
    “The outcome of Codex work in this area would be guidance on methodology and processes, including specific risk management options for risk reduction, based on risk assessment as provided by FAO/WHO through JEMRA and in close collaboration with OIE, taking into account work undertaken in this field at national/regional and international level.”

  - The European Community and its Member States strongly support activities aimed at preventing the development of antimicrobial resistance in a balanced way in all relevant areas: human medicine, veterinary medicine related in particular to animal and food productions, and plant protection.

  In this context, the first indent of the second paragraph should cover all food and not only “antimicrobials used in animals intended for food (including aquaculture) and in feed production”. As indicated in the first paragraph of the Circular Letter (“It was however suggested that Codex future work should (...) address antimicrobials in general so as to cover the use of pesticides and additives and not be restricted solely to antimicrobial drugs, and should also include animal feed.”) and in order to cover pesticides and other antimicrobials used in plant production and at different steps of the food processing chain, the European Community and its Member States would propose the following changes:
“To achieve this outcome, elements would include:

- The establishment of risk profiles with respect to the development of antimicrobial resistance arising from the use of different antimicrobials used in the food chain, i.e. in feed production and processing, in food production and processing, including in food producing animals intended for food (including aquaculture) and in feed production.”

Same version (without “track changes”):

“- The establishment of risk profiles with respect to the development of antimicrobial resistance arising from the use of different antimicrobials in the food chain, i.e. in feed production and processing, in food production and processing, including in food producing animals.”

C. Activities:

- As a consequential change, paragraph iii) under C should be changed accordingly:

  “iii) Establish risk profiles with respect to the antimicrobial resistance potential of different antimicrobials used in food producing animals intended for food and in feed production and processing, including identification of additional data needed for scientific advice.”

- The European Community and its Member States believe that the phrase “food producing animals” could be used throughout the document and replace the phrase “animals intended for food”, this would lead to the following additional changes to paragraphs ii) and vi) under C:

  “ii) Prioritize the antimicrobials used in food producing animals intended for food and in feed production, with a particular emphasis on their public health and animal health significance, taking into consideration ongoing FAO, WHO and OIE work to define antimicrobials critically important to human and animal health.
  
  (...)  

  vi) Develop specific risk management advice based on the identified priorities, the risk profiles, the results of the risk assessments, as well as existing documents/guidelines from FAO, WHO and OIE related to the containment of antimicrobial resistance in food producing animals for food and ongoing work from FAO, WHO and OIE on critically important antimicrobials.”

- In addition, the European Community and its Member States believe that in accordance with the provision of the Procedural Manual of the Codex Alimentarius Commission relating to the Procedures for the Elaboration of Codex Standards and Related Texts, all relevant Codex subsidiary bodies (CCFH, CCRVDF, etc.) should be invited to comment on the draft documents when appropriate.
(b) Suggestions for the title of a new ad hoc Intergovernmental Codex Task Force to deal with antimicrobial resistance and for the length of its mandate

- The European Community and its Member States would suggest naming the new task force as follows:
  
  “Codex Ad Hoc Intergovernmental Task Force on Antimicrobial Resistance”

- Bearing in mind that it was agreed in July 2005 that a final decision as to the establishment of this task force would only be taken at the next session of the Codex Alimentarius Commission, the European Community and its Member States believe that the Intergovernmental Task Force on Antimicrobial Resistance could be invited to submit its final report to the Commission in 2010 at the latest.