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Dear Ms Gibson,

**Regarding the draft revised Code of Practice to Contain and Minimise Foodborne Antimicrobial Resistance (CXC 61-2005)**

Thank you for the opportunity to comment on the draft revised *Code of Practice to Contain and Minimise Foodborne Antimicrobial Resistance (CXC 61-2005)*, which is to be considered at Step 5 for finalisation in July this year.

Animal Medicines Australia (AMA) is the peak industry association representing the registrants and approval holders of veterinary medicines and animal health products in Australia. One of our core functions is to advocate, educate and promote the responsible and judicious use of antibiotics in animals. As such, we have a strong interest in ensuring that these medicines can continue to be registered for use in Australia for the benefit of animal health and welfare, agricultural productivity and public health.

AMA supports the One Health approach taken in this document, which will support international action to address antimicrobial resistance (AMR) across the food chain. AMA acknowledges that the language of the document has been improved to be consistent with the Codex mandate and will allow countries to pursue mitigation efforts relative to local conditions and with consideration of the regulatory resources available to them, without imposing adverse trade impacts.

AMA also acknowledges the important role of risk assessment in addressing AMR. In particular, AMA supports actions to reduce the use of medically important antimicrobial agents for growth promotion purposes. It is also appropriate to exclude ionophores and other agents determined not to be a foodborne AMR risk. These agents are critically important animal medicines and risk assessment has consistently shown that their use does not pose a threat to human health.

However, AMA notes that there are some outstanding issues that are yet to be resolved in relation to the definition and use of ‘therapeutic use’, particularly in Principle 6. The relevant text has been identified by square brackets in the document.

The definition of ‘therapeutic use’ is of particular relevance to animal health and welfare in relation to antibiotic use for disease prevention/prophylaxis. Healthy animals lead better quality and more productive lives, produce higher quantities and better-quality food and fibre, consume fewer resources, and support Australia’s multi-billion dollar agricultural and pet industries. Disease prevention supports animal welfare and sustainable production, and there are known times in the production cycle when some animals are highly likely to develop a bacterial infection, such as young pigs at weaning or new cattle being integrated into feedlot herds. It is vital that veterinarians have the ability to *prevent* animal diseases where possible to support animal welfare and in a manner that is consistent with best practice principles for the responsible and judicious use of antibiotics.

AMA supports the progression of this document to Step 5, noting that agreement on some text is yet to be reached. We look forward to providing feedback on the report of the Expert Working Group which has been tasked with addressing the outstanding text prior to TFAMR08.

I hope that these comments will assist the Australian delegation in the preparation of the national position on this document. If you have any questions, please do not hesitate to contact me.

Yours sincerely,

Charmian Bennett

Science and Technical Manager