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Codex Contact Point for Australia  
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Submitted by email only: [codex.contact@awe.gov.au](mailto:codex.contact@awe.gov.au)

Dear Ms Johan,

**Re: Request for comments at Step 6 on the revised *Code of practice to minimize and contain foodborne antimicrobial resistance* (CXC 61-2005)**

Thank you for the opportunity to provide comments to support the work of the Australian delegation.

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 notes that there are some outstanding issues with this document, most notably in relation to the definition and principles of 'therapeutic use'.

AMA supports the need to harmonise this document with OIE standards where possible to support consistency and coherence between international recognised texts on AMR. As such, AMA supports the OIE definition of 'therapeutic use' that refers to the treatment, control *and prevention* of disease.

Antibiotic use to prevent disease is common to both human and veterinary medicine (for example, when a child is diagnosed with meningococcal meningitis, all children who have been in close contact will also be given antibiotics to prevent disease).

Disease prevention is critically important for animal health and welfare. 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.

Further, AMA supports actions to reduce the use of medically important antimicrobial agents for growth promotion purposes. It is 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.

AMA therefore supports the retention of Principle 6 as written (which becomes Principle 13<sup>1</sup>), in conjunction with the use of the OIE definition for 'therapeutic use'.

Thank you for your consideration of AMA's comments.

If I can provide any further information, please do not hesitate to contact me.

Yours sincerely,

*(unsigned for electronic submission)*

Dr Charmian Bennett

Director Science and Policy

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<sup>1</sup> "**Principle 13:** Medically important antimicrobial agents should only be used for therapeutic purposes (treatment, control/metaphylaxis or prevention/prophylaxis of disease)"