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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 on the Guidelines on integrated monitoring and surveillance of foodborne antimicrobial resistance (at Step 3)**

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 would like to offer the following key points for consideration by the Australian delegation:

- Amendments should not be reopened for definitions which have already been agreed.
- Coherence and consistency with other Codex documents related to antimicrobial use and resistance (eg: the Code of Practice) should be prioritised.
- Clarification of the differences between antimicrobial *sales* data and *use* data is critically important, and all references to such data in the document must be checked for accuracy.
- The document should focus on risk assessment (i.e. surveillance). Risk management is beyond the Terms of Reference for TFAMR and should be removed from the document.
- The document should avoid being overly prescriptive or referencing details that are likely to become out of date quickly (such as testing protocols).

AMA would like to emphasise the need to maintain the focus of the document on *surveillance* and on completing the *core guiding elements of antimicrobial resistance monitoring systems*. This guideline on AMR surveillance provides input into the (first) risk *assessment* phase by providing guidance to understand the current state of antimicrobial foodborne risks in a country and support risk assessment activities such as resistance monitoring, prior to risk management activities.

Risk *management* activities, such as monitoring antimicrobial use, introduce localised and specific challenges associated with differences in (for example) biomass, climate and geography, endemic and exotic disease burdens, production systems, population health, nutrition and trade considerations, that result in important differences in management activities and strategies relative to local conditions and needs.

A strong focus on surveillance in this document will reflect the key Codex principle that risk assessment *precedes* risk management. It will also reduce overlap of this guidance with existing guidance on risk management from OIE. AMA therefore suggests that TFAMR should avoid the inclusion of risk *management* activities and references to antimicrobial *use* should be removed from the document.

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