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Codex Contact Point for Australia
Attn: Meg Johan
CCFICS Secretariat
Department of Agriculture, Water and the Environment
GPO Box 858
Canberra ACT 2601

Submitted by email only: codex.contact@awe.gov.au

Dear Ms Johan,

Re: Request for comments at Step 7 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 supports the adoption of the current draft of the revised Code of Practice at the upcoming TFAMR meeting. The current draft reflects the Codex values of risk-analysis and science in decision-making, and significant improvements have been made over numerous meetings. The current draft strengthens efforts to address AMR along the food chain and includes a One Health approach.

Noting the significant improvements that have been made, AMA believes that discussions on the revised Code of Practice should be restricted to the 2 sections of bracketed text that have not yet been finalised - the definition and principles of 'therapeutic use', and the use of medically important antibiotics for therapeutic purposes. Discussion should not be reopened on text that has already been extensively discussed and where consensus has already been obtained.

As we have previously noted, AMA supports the retention of a definition in the revised Code of Practice for 'therapeutic use', and that this definition should align with the OIE definition of 'veterinary medical use', which includes treatment, control *and prevention* of disease. 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 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 adoption of Principle 13 as written, in conjunction with the OIE definition of 'therapeutic use' as noted above.

In general, AMA would like to emphasise the importance of harmonisation of this document with OIE standards to support consistency and coherence between internationally recognised texts on AMR. Similarly, it is important that the agreed concepts, definitions and principles in the Guidelines for Integrated Monitoring and Surveillance of Foodborne AMR (also to be discussed at this meeting) are consistent with those of the revised Code of Practice.

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