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

Submitted by email only: [codex.contact@awe.gov.au](mailto:codex.contact@awe.gov.au)

Dear Ms Johan,

**Re: Request for comments on the COP and GLIS for final adoption at CAC44**

Thank you for the opportunity to comment on the following two documents for adoption at the forthcoming Codex Alimentarius Commission (CAC44) meeting:

- (i) Revised Code of Practice to Contain and Minimize Foodborne Antimicrobial Resistance (CXC 61- 2005) (At Step 8), and
- (ii) Guidelines on Integrated Monitoring and Surveillance of Foodborne Antimicrobial Resistance (At Step 5/8).

Animal Medicines Australia supports finalisation of these two documents for the following reasons:

- The final documents are within the mandated scope of TFAMR;
- They provide flexibility for implementation and contain appropriate guidance;
- The focus is on antimicrobial *resistance*, rather than antimicrobial *use*;
- Text that mitigates against the use of these documents as trade barriers has been retained; and
- The content is science-based.

Animal Medicines Australia considers that the final documents are mostly balanced and appropriate, and can support their adoption at the forthcoming CAC44 meeting.

Animal Medicines Australia acknowledges the work of the Codex Australia team over the last 5 years to contribute to the development of these documents. Australia's high quality contributions to TFAMR discussions have also been noted with gratitude by other delegations.

We look forward to working with the Australia delegation on future Codex activities, particularly the work of the Codex Committee of Residues of Veterinary Drugs in Food (CCRVDF). If we can provide information to assist with other Codex-related activities, please do not hesitate to contact me.

Yours sincerely,

Dr Charmian Bennett

Director, Science and Policy

*(unsigned for electronic submission)*