

**European Community Comments for the
CODEX COMMITTEE ON RESIDUES OF VETERINARY DRUGS IN
FOODS**

Washington, D.C., 28 - 31 March 2000

Agenda item 5 - CX/RVDF 00/4

Antimicrobial resistance and the use of antibiotics in animal production

Background:

At the 11th session of the Committee there was a lengthy discussion on the issue of antibiotic resistance. No conclusions were reached and the Committee agreed to consider further whether or not to proceed with this issue in the CCRVDF at its 12th Session (Annotated agenda 12th CCRVDF, Annex I).

At the 32nd session of the Codex Committee on Food Hygiene held 29th November to 4th December 1999 (ALINORM 01/13, Appendix II) the delegation of Denmark presented a discussion paper considering all sources of antimicrobial resistance (CX/FH 99/12, Annex III). Recommendations in the paper were that this issue should be dealt with in a multi-disciplinary approach. In Codex, the CCRVDF and the CCFH should have the mandate to deal with these problems according to the terms of reference of these committees.

The Codex Secretariat added that the 23rd Session of the Commission had also established an “*ad-hoc Intergovernmental Codex Task Force on Animal Feeding*” whose terms of reference also included antimicrobial resistance.

The representative of the WHO (Jorgen Schlundt) reported on the work of WHO on this subject in collaboration with OIE and FAO and stressed the importance of establishing a risk profile within the Codex framework, including consideration of factors that contribute to an increase in antimicrobial resistance.

The delegation of the United States and the European Commission thought there was no need to deal with this issue in CCFH, as it would be adequately addressed by WHO/FAO/OIE, CCRVDF and CCPR. Other parties stressed that antibiotic resistance in relation to the microbial safety of food should be discussed within CCFH.

The delegation of Denmark will redraft the paper and this will be considered at the next session of the CCFH. Also, the Committee, recognising the importance of the issue, asked the advice of the executive Committee and the Commission on how to proceed in order to ensure co-ordination of the work between the Committees concerned.

EC	CL	Committee	Status	Date
Comments	CX/RVDF 00/4	CC RDVF	Final	28/03/2000

\\DG24-SVR-01\common\WebDev\codex\CC RDVF\ccrdvf-cx_00-04-ec_response-280300final_en.doc

European Community Proposal:

Evaluation of residues of animal drugs in food

The European Community suggests that CCRVDF take the lead on the issue of antimicrobial resistance as it relates to the evaluation of residues of animal drugs in food in close co-operation with CCFH and the Codex ad hoc Intergovernmental Codex Task Force on Animal Feeding.

Mandate of the CC RDVF

The mandate of the CC RDVF, as defined at this time, may cover the problem of antimicrobial resistance at different levels:

1. Concerns that have been addressed in the past
 - evaluation of the risk connected to the impact that certain residues have on the gut flora of the consumer, especially in relation to a possible pressure of selection executed by residues that have an anti microbial activity;
2. Concerns that should in future also be taken into account in relation to antimicrobial resistance:
 - effects related to use of antimicrobials as animal drugs, for example:
 - development of resistance in certain bacterial populations likely to present unacceptable problems to human health
 - modification of practices of animal breeding.

Codes of practice

The committee should also re-consider the relevant existing codes of practice concerning the use of veterinary drugs in relation to concern on antimicrobial resistance. In the discussions co-ordinated by WHO and FAO as well as OIE emphasis is made to describe the “*prudent use antimicrobials in the production of food producing animals*”. Relevant recommendations are mainly linked to the requirements a product has to fulfil in order to be licensed or authorised (see also OIE report Agenda item 6).

Collaboration other Codex Committees and Task Forces

Co-ordination of the work between CCRVDF, CCFH and the Codex ad hoc Intergovernmental Codex Task Force on Animal Feeding should be established. Duplication of work within Codex should be avoided. The Codex Alimentarius Commission should consider how this subject could be co-ordinated. In this respect the EC recommends that the following tasks may be appropriate for the technical committees.

EC	CL	Committee	Status	Date
Comments	CX/RVDF 00/4	CC RDVF	Final	28/03/2000

\\DG24-SVR-01\common\WebDev\codex\CC RDVF\ccrdvf-cx_00-04-ec_response-280300final_en.doc

Codex Committee on Food Hygiene (CCFH)

The CCFH deals with horizontal approaches to microbiological problems in food. In this role the CCFH should examine the risk management options available once the risk to health from the occurrence of resistant bacteria in food has been established. CCFH and CCRVDF should collaborate to develop a discussion paper. In this exercise the problem of resistant bacteria in the food chain should be addressed through formal risk analysis procedures. As part of a formal risk assessment procedure, questions should be delegated to the relevant scientific expert group(s) and prioritised.

Codex ad-hoc Intergovernmental Codex Task Force on Animal Feeding

The ad-hoc Task Force on animal feeding should address the issue as it relates to animal feeding practices. A clear definition between feeding and therapeutic use (feed/drinking water) needs to be developed.

Considerations on the distributions of tasks

It should be noted that the CCFH has no expert group to assist it with scientific expertise. JECFA's expertise is limited to the evaluation of the microbiological risks that the use of veterinary drugs might have on the human gut flora.

The role of a newly formed "Expert group on microbiological hazards" should be examined in relation to the risk assessment of resistant organisms. Codex could be assisted by other scientific advisors with the relevant expertise.

Since recommendation on "*prudent use antimicrobials in the production of food producing animals*" are mainly linked to the requirements a product has to fulfil in order to be licensed or authorised decisions taken on this level should be taken by the risk managers in CC RDVF.

In the European Community several experts groups have completed reports on antimicrobial resistance. These reports could provide the starting point for a scientific basis in establishing microbial risks within Codex (Annex IV). Denmark could use these papers as a basis for the redrafting of the discussion paper for the CC FH.

EC	CL	Committee	Status	Date
Comments	CX/RVDF 00/4	CC RDVF	Final	28/03/2000