

## European Union comments

### Circular Letter CL 2021/65-AMR

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

*Mixed Competence  
European Union Vote*

The European Union and its Member States (EUMS) are pleased to provide the following response to CL 2021/65-AMR:

#### The definition for “therapeutic use”

The EUMS reiterate their view that the proposed definition for “therapeutic use” should be deleted because:

- The proposed definition would put preventive/prophylactic and control/metaphylactic use of antimicrobials on equal footing with the use of antimicrobials for treatment of diseases. Indeed, if defined in this way, it could promote the use of antimicrobials for prevention when, on the contrary, we should aim at limiting this practice which demonstrably is a major driver of AMR.
- In the current version of CXC 61-2005 the terms “treatment” and “therapeutic use” are considered synonyms with the following common definition: “**Treatment/Therapeutic Use** refers to use of an antimicrobial(s) for the specific purpose of treating an animal(s) with a clinically diagnosed infectious disease or illness.”
- In the World Organisation for Animal Health (OIE) context, when the relevant revised OIE Terrestrial Code chapter 6.9. was adopted in 2018, using the term “therapeutic use” for covering treatment, control/metaphylaxis and prevention/prophylaxis of disease was rejected, precisely because “therapeutic use” and “treatment” are considered synonyms. To overcome this hurdle and to avoid misunderstandings, OIE introduced the term “veterinary medical use” to encompass treatment, control and prevention. Thus, having the proposed definition for therapeutic use in Codex would not be in line with the agreed OIE international standards. On the contrary, it would undermine the consensus that was reached within OIE a few years ago and create a serious inconsistency between the international standards of OIE and Codex.
- There is no need for such definition. In the few paragraphs (34, 52, 54, 55) where the term “therapeutic” is used, it could be either deleted or replaced with the term “dosage” which is the term used in the corresponding paragraphs of the current version of CXC 61-2005.

- In the last bullet point of paragraph 54, the use of the term “therapeutic” with its proposed definition would create a particular confusion when it says that “the veterinarian or plant/crop health professional should consider a therapeutic regimen that is long enough to allow an effective treatment”.

### **Principle 12**

The EUMS continue to be of the view that the use of all antimicrobials for purposes of growth promotion or weight gain should be phased out, starting immediately from medically important antimicrobials.

### **Principle 13**

The EUMS continue to have concerns that in its current form principle 13 does not reflect the extent to which prudent use should be applied to antimicrobials in general and to medically important antimicrobials in particular. In fact, as currently written, and together with the proposed definition for “therapeutic use”, it would promote the use of medically important antimicrobials for control and prevention of disease and thus compromise efforts to limit the spread of AMR.

As became apparent in the physical working group in June 2021, the EUMS are not alone with these concerns. Since then, the Global Leaders Group on Antimicrobial Resistance (GLG) stated that “further improvements to reduce their [antimicrobials] use and ensure responsible and sustainable use in food systems are both of the utmost importance and attainable. Although challenging in some situations, this must be prioritized by all countries, sectors and organizations.” In the view of the GLG all countries should i.a. “Limit antimicrobial prophylaxis and metaphylaxis in animals and plants to well-defined situations, with a goal of markedly reducing use and ensuring that all use is performed with regulatory oversight and under the direction of an authorized prescriber.”

For the sake of compromise, the EUMS could support the wording proposed by Canada during the physical working group meeting in June, **with a slight editorial alteration (inversion of metaphylaxis and prophylaxis, as a more logical and usual order):**

*“Medically important antimicrobials should only be used for disease treatment **or control/metaphylaxis and/or prevention/prophylaxis** purposes and only under the conditions laid down in principles 7-10, and 14 and 15.”*