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Committee on Sanitary and Phytosanitary Measures

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**FLOOR STATEMENTS
NOVEMBER 2019 WTO SPS COMMITTEE - FORMAL MEETING**

AGENDA ITEM 4(E)(I): CODEX TASK FORCE ON ANTIMICROBIAL RESISTANCE

Communication from the United States of America

The following communication, received on 12 November 2019, is being circulated at the request of the Delegation of the United States of America.

1. The United States is strongly committed to addressing the important issue of anti-microbial resistance—or AMR—through sound science and collaboration in Codex. We take the floor to call attention to work undertaken by the Codex Task Force on AMR (TFAMR), particularly the Draft Guidelines for Integrated Surveillance (GLIS) at Step 2/3.

2. We are concerned that the GLIS is currently written to a more aspirational level than what scientific understanding, and therefore, a Codex document, should espouse, rather than focusing on practical guidance for countries to prioritize and survey for known foodborne AMR risks.

3. According to Article 5.1 of the SPS Agreement, measures must be based on an assessment, as appropriate to the circumstances, of the risks to human, animal or plant life or health, taking into account risk assessment techniques developed by the relevant international organizations.

4. Codex developed relevant international guidance for risk assessment through the Codex Guidelines for Risk Analysis for Foodborne AMR (CAC/GL 77-2011).

5. While it is important for countries to consider the various sources of foodborne AMR as described within CAC/GL 77-2011 to assess risk, it is not necessarily appropriate to address all potential hazards from all sources within the Codex forum and develop surveillance guidance for them.

6. On this matter, we recall the mandate given to the Committee in Paragraph 4 of Article 12 of the SPS Agreement, to monitor the use of international standards, and the direction given in G/SPS/11/Rev.1, that the Committee should help identify, for the benefit of the relevant international organizations, where a standard, guidance or recommendation was needed or was not appropriate for its purpose and use.

7. Noting a lack of scientific justification to include crops, the environment, and biocides in TFAMR work, the TFAMR requested scientific advice. The FAO/WHO fulfilled the request in 2018 and some findings include:

- Data regarding dissemination of AMR organisms from crops that are consumed raw impacting human health is sparse;
- Systems to record antimicrobial use (AMU) and AMR organisms on fruits and vegetables at the national level are virtually absent;
- A key challenge will be determining an appropriate standard denominator to characterize AMU; and that

- The magnitude of the public health threat posed by AMR organisms and genes in the environment, and the effects of antimicrobial residues on soil ecosystem services, such as biogeochemical cycles, are still unknown.

8. The FAO concluded that to develop science-based recommendations to mitigate AMR, the use of antimicrobials in plant production resulting in occupational exposure, food, and environmental contamination needs to be assessed.

9. The United States calls attention to the fact that despite the lack of information, the current draft GLIS includes text proposing surveillance for crop AMR and AMU. There is no demonstration of any reliable data establishing plant pathogens are transmissible to humans, or that AMU in crop production has resulted in any foodborne AMR human health concerns.

10. The current draft GLIS appears to confuse hazards with risk and overstates what a surveillance system can do. For example, it states surveillance data will identify "burden of illness" and "interrelationship between AMR and AMU" and that "whole genome sequencing can allow for determination of the epidemic source". Case-control studies, targeted studies, epidemiological evidence, and other information are necessary beyond surveillance data to do any of this.

11. Countries with high levels of resources currently conduct AMR surveillance for human clinical foodborne illness, retail meats, and food animal at slaughter, as described in the World Health Organization's (WHO) Advisory Group on Integrated Surveillance of Antimicrobial Resistance (AGISAR).

12. Recognizing that most countries have limited resources and some countries are especially challenged, it is important that resources be expended for surveillance on areas that address actual public health needs. Data and knowledge gaps should be filled before science and risk-based guidance can be developed for additional sectors.

13. We strongly urge Members to base any, and all, future work of the TFAMR in sound scientific risk-based principles, and to ensure that the GLIS not obligate countries to set up surveillance for theoretical hazards, which may be better handled through research and special studies to help identify national priorities. This approach is protective of public health, and consistent with Members' WTO obligations.

14. Chair, we appreciate the discussions in this Committee on actions to improve transparency, and support greater shared understanding of concerns raised in this Committee. We will therefore submit this statement to the Secretariat and request its issuance as a GEN document.
