

August 20, 2018

Ms. Mary Frances Lowe
U.S. Manager for U.S. Codex
U.S. Department of Agriculture
4861 South Building
Washington, DC 20250

Dr. Donald Prater
Assistant Commissioner for Food Safety Integration
FDA Office of Foods and Veterinary Medicine
White Oak Office Building 1, Rm 3234
10903 New Hampshire Avenue
Silver Spring, MD 20993

RE: Codex Alimentarius Task Force on Antimicrobial Resistance

Dear Ms. Lowe and Dr. Prater,

We, the undersigned consumer, public health, animal protection and environmental advocacy organizations write to request your assistance in addressing the critical and growing problem of antimicrobial resistance. We urge you, as the U.S. Manager for U.S. Codex and as the U.S. Delegate for the Ad hoc Codex Intergovernmental Task Force on Antimicrobial Resistance (TFAMR), to support referencing the [World Health Organization Guidelines On Use Of Medically Important Antimicrobials In Food-Producing Animals](#) (WHO Guidelines) and support including specific recommendations based on the WHO Guidelines in the documents being prepared by the [TFAMR](#). We ask that the U.S. support inclusion of guidance recommending:

- a complete restriction on the use of medically important antimicrobials for growth promotion without a risk assessment caveat;
- restriction on the use of medically important antimicrobials for disease prevention, and;
- specific limitations on the use of the highest priority critically important antimicrobials.

The WHO Guidelines were created by an expert panel that included an expert on antimicrobial resistance from the U.S. Centers for Disease Control and Prevention and a retired expert from the U.S. Public Health Service. It also included input from antimicrobial resistance experts from the World Organization for Animal Health (OIE) and the Food and Agricultural Organization (FAO). The WHO Guidelines are based on multiple systematic reviews of the literature on the link between antibiotic use in food producing animals and the threat of antibiotic resistance.¹ These are exactly the types of science-based guidelines that should inform Codex Alimentarius recommendations.

Antimicrobial resistance is a global challenge and requires a global response. While the U.S. has taken recent important steps to reduce the contribution of agriculture to the threat of antibiotic resistance, many countries have not done so, and the U.S. itself can go further. Clear and strong international guidance through the consensus-based process of Codex Alimentarius is important

¹ Tang et al. 2017. Restricting the use of antibiotics in food-producing animals and its associations with antibiotic resistance in food-producing animals and human beings: a systematic review and meta-analysis. *Lancet Planet Health*. 1(8):e316-e327; Scott et al. 2018. Is antimicrobial administration to food animals a direct threat to human health? A rapid systematic review. *Int J Antimicrob Agents*. pii: S0924-8579(18)30107-9.

to protect consumers in the U.S. and around the globe. Ignoring or actively working against the inclusion of the important scientific contribution of the World Health Organization (WHO) is counterproductive. We ask that the U.S. support the inclusion of the WHO Guidelines along with the important work of the FAO and OIE in the work of the TFAMR. U.S. support for these guidelines would greatly improve the chances that the Codex task force provides strong recommendations and helps countries to take steps towards meaningfully reducing the improper use of antimicrobials in agriculture and preserving the utility of essential medicines for human and animal health.

Sincerely,

Antibiotic Resistance Action Center, the George Washington University
Center for Foodborne Illness Research & Prevention
Center for Science in the Public Interest
Clinician Champions for Comprehensive Antibiotic Stewardship (CCCAS)
Consumer Federation of America
Consumers Union
Food Animal Concerns Trust
Health Care Without Harm
Humane Society Legislative Fund
Humane Society of the United States
Humane Society Veterinary Medical Association
Johns Hopkins Center for a Livable Future
National Center for Health Research
Natural Resources Defense Council
Pediatric Infectious Diseases Society
Society for Infectious Diseases Pharmacists
Waterkeeper Alliance