



April 3, 2020

U.S. Delegate Codex TFAMR

Donald A. Prater, DVM
Assistant Commissioner for Food Safety Integration
Office of Foods and Veterinary Medicine
Food and Drug Administration
10903 New Hampshire Avenue
Silver Spring, MD 20993

US Alternate Delegate Codex TFAMR

Neena Anandaraman, DVM, MPH
Veterinary Science Policy Advisor
Office of Chief Scientist
U.S. Department of Agriculture
1200 Independence Avenue, SW, Room 339A
Washington, DC 20024

Re: Comments on Codex Task Force on Antimicrobials Resistance Draft Guidelines on Integrated Monitoring and Surveillance of Foodborne Antimicrobial Resistance

Dear Drs. Prater and Anandaraman:

On behalf of the National Milk Producers Federation (NMPF) and U.S. Dairy Export Council (USDEC), we would like to provide the attached comments on the Codex Task Force on Antimicrobials Resistance (TFAMR) Draft *Guidelines on Integrated Monitoring and Surveillance of Foodborne Antimicrobial Resistance* (Guidelines). The comments specifically address the Codex Secretariat request for comments to advance the draft Guidelines through an electronic Working Group (eWG) in advance of the 8th Session of the TFAMR in December 2020 (TFAMR08).

We believe that the proposed draft Guidelines require substantial revision. In its current form, consensus will be hard to reach on the draft Guidelines. The draft Guidelines have many aspirational elements that are currently presented as requirement which will be unobtainable by many developing countries. Our concern that if unchanged, the draft Guidelines could be used as nontariff trade barriers without any impact on mitigating the risk of AMR transfer through the food chain. Our hope is that substantial progress and improvements can be made through the eWG so that consensus may be reached during TFAMR08. However, the charge to the Taskforce was to consider but not require a Guidelines document. If consensus cannot be reached at TFAMR08 (the last schedule meeting for the Taskforce), work on the draft Guidelines should be halted and the Taskforce should sunset per the original charge from the Codex Commission.

Please contact us at jjonker@nmpf.org, ngardner@usdec.org, or 703-243-6111 if you have any questions concerning these comments. Thank you for the opportunity and for your consideration.

Sincerely,

Jamie Jonker
NMPF Vice President
Sustainability & Scientific Affairs

Nicholas M. Gardner
USDEC Director
Codex and International Regulatory Affairs



The U.S. Dairy Export Council is a non-profit, independent membership organization that represents the global trade interests of U.S. dairy producers, proprietary processors and cooperatives, ingredient suppliers and export traders. Its mission is to enhance U.S. global competitiveness and assist the U.S. industry to increase its global dairy ingredient sales and exports of U.S. dairy products. USDEC accomplishes this through programs in market development that build global demand for U.S. dairy products, resolve market access barriers and advance industry trade policy goals. USDEC is supported by staff across the United States and overseas in Mexico, South America, Asia, Middle East and Europe. The U.S. Dairy Export Council prohibits discrimination on the basis of age, disability, national origin, race, color, religion, creed, gender, sexual orientation, political beliefs, marital status, military status, and arrest or conviction record. www.usdec.org.

The National Milk Producers Federation (NMPF), based in Arlington, VA, develops and carries out policies that advance the well-being of dairy producers and the cooperatives they own. The members of NMPF's cooperatives produce the majority of the U.S. milk supply, making NMPF the voice of dairy producers on Capitol Hill and with government agencies. For more on NMPF's activities, visit our website at www.nmpf.org.