

CUJ submitted the following demand letter (English version) to the Japanese government concerning a new guideline on antimicrobial resistance related to food being discussed in the Codex Ad Hoc Intergovernmental Task Force on Antimicrobial Resistance. We think that the position the Japanese government took at the second meeting in Korea in October 2008 did not reflect the Japanese consumers strong concerns about food safety.

**Regarding the guideline on antimicrobial resistance related to food under discussion in the**

**Codex Ad Hoc Intergovernmental Task Force on Antimicrobial Resistance**

**(Translation)**

To:

Members of the Japanese Codex Liaison Committee

Members of the Japanese Government Codex Delegation

From:

Consumers Union of Japan

November 14, 2008

The second meeting of the Codex Ad Hoc Intergovernmental Task Force on Antimicrobial Resistance was held in Seoul, Republic of Korea, on October 20-24, 2008. The topics debated included agenda item 4, "Proposed Draft Risk Assessment Guidance Regarding Foodborne Antimicrobial Resistant Microorganisms" and guidance on creating risk profiles for antimicrobial resistant foodborne microorganisms for setting risk assessment and management profiles. Related to this debate, we have identified the following issues, listed below. We would like Japan's national liaison committee to thoroughly examine these points. We demand that the Japanese government

base its position for the third task force meeting to be held in 2009 on the results of the discussion of this liaison committee.

1) As for agenda item 4 (which was added to the agenda items in CX/AMR 08/2/1), we agree that the three proposed documents on risk assessment, management and profiling be integrated into one guidance document, but we demand that this integration be done without any suppression of the contents of the original three documents.

2) During the discussion of agenda item 7 (agenda item 6 in the original CX/AMR 08/2/1), withdrawal from sale of food contaminated by antimicrobial resistant bacteria was debated as a risk management option. At that time, Canada, Norway and the EC supported the adoption of this option, but the representative from the Japanese government, Singapore, Thailand, the United States and Australia were opposed to the adoption of this option. We would like you to explain the reason. As food contaminated with bacteria that has acquired resistance to antibiotics is a serious health risk, we feel this food recall option should be stated clearly.

3) We urge the Japanese government to support the proposals for agenda item 7 (risk management) from the viewpoint of consumer protection, particularly regarding efforts to reducing antimicrobial drug use to reduce antimicrobial resistance.

4) Regarding the options for agenda item 7, we feel it is necessary to investigate the proper management and examination of animal feed, waste products including excrement and urine etc. We strongly demand that this should be actively discussed at the third meeting in 2009.

For more information, please contact Yamaura Yasuaki, Consumers Union of Japan

**Address:** Nishi Waseda 1-9-19-207, Shinjuku-Ku, Tokyo Japan (169-0051)

**E-mail:** yamaura@nishoren.org

Official report:

[http://codextfamr.kfda.go.kr/eng/041st/04\\_02.html](http://codextfamr.kfda.go.kr/eng/041st/04_02.html)