

From: [Janet Collins](#)
To: [Anandaraman, Neena - OSEC](#); [Jim Cranney](#); [Ray McAllister](#)
Cc: [Courtney DeMarco](#); [Lowery, Kenneth - OSEC](#); [Washington, DC](#); [Fajardo, Julius - OCE](#); [Herndon, George-FASContact](#)
Bcc: [Fajardo, Julius](#)
Subject: RE: Codex TFAMR for Comments CoP2
Date: Tuesday, August 7, 2018 1:37:19 PM

Understood.

Janet

(b) (6) (direct)
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From: Anandaraman, Neena - OSEC <Neena.Anandaraman@osec.usda.gov>
Sent: Tuesday, August 7, 2018 12:46 PM
To: Janet Collins <(b) (6)@croplifeamerica.org>; Jim Cranney <(b) (6)@ccqc.org>; Ray McAllister <(b) (6)@croplifeamerica.org>
Cc: Courtney DeMarco <(b) (6)@croplifeamerica.org>; Lowery, Kenneth - OSEC, Washington, DC <Ken.Lowery@osec.usda.gov>; Fajardo, Julius - OCE <Julius.Fajardo@OCE.USDA.GOV>; Herndon, George-FASContact <herndon.george@epa.gov>
Subject: RE: Codex TFAMR for Comments CoP2

Thanks Jim and Janet.

The documents are far from solid. They are still at the electronic working group stage and at Step 3 in the process which means everything is bracketed and up for debate at the next Task Force meeting in December.

This is a 3-4 year Task Force and we are just on the second meeting this December.

We will get another chance to comment as a Member State (rather than an Electronic Working Group Member) on what is drafted from what we comment on now around late September to late October.

The Electronic Working Group has to give people a draft of something to comment on and that's all you are seeing here.

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From: Janet Collins <(b) (6)@croplifeamerica.org>
Sent: Tuesday, August 7, 2018 11:30 AM
To: Jim Cranney <(b) (6)@ccqc.org>; Anandaraman, Neena - OSEC <Neena.Anandaraman@osec.usda.gov>; (b) (6)@croplifeamerica.org
Cc: Courtney DeMarco <(b) (6)@croplifeamerica.org>; Lowery, Kenneth - OSEC, Washington, DC <Ken.Lowery@osec.usda.gov>; Fajardo, Julius - OCE <Julius.Fajardo@OCE.USDA.GOV>; Herndon, George-FASContact <herndon.george@epa.gov>
Subject: RE: Codex TFAMR for Comments CoP2

Thanks Jim- I was aware of the background but thought further push was an option; I will leave this to your direction at this point.

These documents are solid; but/and this exercise is going to take much longer to retrofit- perhaps that is ok as well.

Thanks again to all.

Janet

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From: Jim Cranney <(b) (6)@ccqc.org>
Sent: Tuesday, August 7, 2018 11:21 AM
To: Janet Collins <(b) (6)@croplifeamerica.org>; Anandaraman, Neena - OSEC <Neena.Anandaraman@osec.usda.gov>; Ray McAllister <(b) (6)@croplifeamerica.org>
Cc: Courtney DeMarco <(b) (6)@croplifeamerica.org>; Lowery, Kenneth - OSEC, Washington, DC <Ken.Lowery@osec.usda.gov>; Fajardo, Julius - OCE <Julius.Fajardo@OCE.USDA.GOV>; Herndon, George-FASContact <herndon.george@epa.gov>
Subject: RE: Codex TFAMR for Comments CoP2

Hello Janet,

The ARM Task Force is operating at the Codex Commission level, which is to say that it is the policy people acting over all of the Codex Committees. I provided two background documents that pretty much show that there is no practical possibility of pushing back on the inquiries about antimicrobials on crops or their inclusion in the Code of Practice document.

The first document is a call for information about antimicrobial use on crops from FAO and WHO at the 2017 Codex Committee meeting on pesticide residues. The London document provides information on the genesis of the task force and its objectives.

I think our best option is to continue to work with U.S. government agencies to formulate reasonable scientific positions that are consistent with our approach in the United States and to form a close working relationship with government officials, so more radical international forces won't unhinge our regulatory approach in the United States. As I mentioned in my previous comments, this would

also include a close working relationship on public communication.

Meanwhile, I think we should try to have as much influence as we can in the Codex process without calling too much attention to the horticultural sector.

Regards,
Jim

James R. Cranney, Jr.
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Subject: RE: Codex TFAMR for Comments CoP2

My point is that they already are working on this, there is a less than one percent issue with crops—and while I understand they made the request, I don't believe the request was specific to crops (I will look at this again). This is a huge distraction and will take time to put together. That's why I am trying to find out how likely any pushback would have an impact.

Thanks.

Janet
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From: Anandaraman, Neena - OSEC <Neena.Anandaraman@osec.usda.gov>
Sent: Tuesday, August 7, 2018 8:48 AM
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Subject: Re: Codex TFAMR for Comments CoP2

Hi Janet, I'm not sure I understand the question. It's FAO and WHO that asked Codex, their food standards organization to take up the work and encouraged expansion to crops and the environment. FAO just held an expert meeting to provide scientific advice to this Codex Task Force I shared with this distribution a few weeks ago: <http://www.fao.org/antimicrobial-resistance/news-and-events/news/news-details/en/c/1144999/>

Happy to talk if you need more background.

From: "Janet Collins" (b) (6) @croplifeamerica.org>
Date: Tuesday, August 7, 2018 at 8:34:54 AM
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Subject: RE: Codex TFAMR for Comments CoP2

All- see this. It is an FAO/OIE/WHO program- can we get pushback from FAO on moving the CoP for crops forward?

The FAO/OIE/WHO initiatives, together with public and private organizations, shares responsibility for addressing and coordinating global activities addressing AMR at the animal-human-ecosystems interface. FAO is working closely with key partners such as the World Organisation for Animal Health (OIE), the World Food Organisation (WHO) and others in a global response to the threat of AMR.

Janet
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From: Anandaraman, Neena - OSEC <Neena.Anandaraman@osec.usda.gov>
Sent: Monday, August 6, 2018 8:25 AM

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On Aug 4, 2018, at 7:29 PM, Anandaraman, Neena - OSEC <Neena.Anandaraman@osec.usda.gov> wrote:

Hi Janet,

I've only been able to work through your comments so far and haven't made it to Ray's or Jim's. While I understand that you all have concerns about mixing crop information into this document, unfortunately, that only seems to be the opinion of the US and we will be isolated. So completely removing references to crops is a failing option. The objectionable language you are seeing in this document is coming from the EU and others and we will not be successful in just asking it to be kept out. Everyone is pushing for it to be in so if you all could give us alternate appropriate language to put in a separate crop section, we could try to ask for a separate section applicable to crops and get the rest out, but we need help from our crop experts for that.

I'm attaching the draft Julius originally did that we edited with your comments. I'm also attaching my comments to your comments. I recognize the crop community has not been engaged on this issue as it has pushed forward in the other sectors and I'm happy to talk through any of the background on WHO Global Action Plans and National Action Plans if helpful, but I really need help from the crop experts in order to make appropriate US comments with appropriate proposed language and justification.

I need language from you all and I'm happy to talk if a conference call would be helpful. Even better, since I have my hands full in trying to address the animal side too, if you could work with Julius and the experts at EPA, I'm happy to take what you all come up with.

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Cc: (b) (6) @croplifeamerica.org; Courtney DeMarco (b) (6) @croplifeamerica.org
Subject: RE: Codex TFAMR for Comments CoP2

Neena- many apologies for the delay; we appreciate your permitting CLA to provide comments by today (Friday)- granted its after hours but they are complete for these documents with input from both me and Ray.

Other document review to come on time- Monday. Have a good weekend.

My best,

Janet
(b) (6) (direct)
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From: Anandaraman, Neena - OSEC <Neena.Anandaraman@osec.usda.gov>
Sent: Monday, July 30, 2018 1:30 PM
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Subject: FW: Codex TFAMR for Comments CoP2

Gentle reminder

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From: Lowery, Kenneth - FSIS

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Subject: Codex TFAMR for Comments CoP2

Dear TFAMR Stakeholders,

Please see attached a new version of the revised text for the Code of Practice to Minimize and Contain Antimicrobial Resistance from the Electronic Working Group Chair and Co-chairs.

Please send comments by July 30, 2018 to Neena.Anandaraman@osec.usda.gov , Ron.Miller@fda.hhs.gov ; Ruby.Singh@fda.hhs.gov ; Kenneth.Lowery@fsis.usda.gov for consideration in drafting of U.S. Comments. When sending comments, please provide text for suggested revision and justification as much as possible. The Electronic Working Group Chair and Co-chairs will next review comments submitted to prepare a report including further revised text for submission to the Codex Secretariat. Our understanding is that the report will be circulated ahead of the next meeting of the TFAMR in December 2018 for further comment by Member States and Observers.

Neena Anandaraman, DVM, MPH, DACVPM
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Ken

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