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On 7 April 2017, the CPME Executive Committee adopted the 'CPME response to public consultation on possible activities under a 'Commission Communication on a One Health Action Plan to support Member States in the fight against Antimicrobial Resistance (AMR)' (CPME 2017/008 FINAL)

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CPME response to public consultation on possible activities under a  
'Commission Communication on a One Health Action Plan to support Member States in the  
fight against Antimicrobial Resistance (AMR)'

CPME answers appear in [blue font](#).

## INTRODUCTION

### GENERAL CONTEXT

This questionnaire is a working document prepared by the European Commission. This consultation aims to collect the views of administrations, associations and other organisations for the 'Commission communication on a One Health action plan to support Member States in the fight against antimicrobial resistance (AMR)'. The outcome of this public consultation will provide input to the currently ongoing process on proposals for the Commission communication. It is without prejudice to the final position of the European Commission.

The consultation builds on several already completed activities including:

- The [public consultation on a roadmap for a 'Commission communication on a One Health action plan to support Member States in the fight against antimicrobial resistance \(AMR\)'](#), published on October 2016
- The [evaluation of the European Commission's 2011-2016 action plan against the rising threats from antimicrobial resistance](#), published on October 2016
- The [Council conclusions on the next steps under a One Health approach to combat antimicrobial resistance \(10278/16\)](#) of 17 June 2016
- The [Commission communication to the European Parliament and the Council on the action plan against the rising threats from antimicrobial resistance \(AMR\) \(COM \(2011\) 748\)](#), published on November 2011

### A SHORT INTRODUCTION ON ANTIMICROBIAL RESISTANCE

Antimicrobial resistance (AMR) describes a situation where microbes become resistant to antimicrobial medicines, making these medicines ineffective. AMR is a growing global threat and a significant societal and economic challenge. High political importance has been attached to the issue within the EU, the groups of 7 (G7) and 20 (G20) industrialised nations, the United Nations (UN) and international organisations such as the World Health Organization (WHO), the World



Organisation for Animal Health (OIE) and the Food and Agriculture Organization of the United Nations (FAO). The

Council conclusions of 17 June 2016 on AMR called for a reinforced EU strategy against AMR and a new and comprehensive EU action plan on AMR based on a One Health approach [3].

The European Commission's 2011-2016 action plan has been independently evaluated. The [evaluation](#) concluded that the EU can bring added value in the fight against AMR, by: 1) supporting

Member States and making the EU a best practice region on AMR; 2) boosting research, development and innovation against AMR; and 3) shaping the global agenda on AMR.

## 1. INFORMATION ABOUT THE RESPONDENT

1.1. Please indicate the name of your organisation/association/administration:

**CPME – Standing committee of European doctors**

1.2. Please enter the country where your organisation/association/administration is based:

**Belgium**

1.3. Please indicate whether your organisation/association/administration is listed in the Transparency Register\*:

**Yes**

## 2. IDENTIFICATION OF RESPONDENT

## 3. PILLAR I: SUPPORTING MEMBER STATES AND MAKING THE EU - A BEST PRACTICE REGION ON AMR

3.1. In order to ensure greater coherence and help Member States' efforts to fight AMR, a number of activities are listed in the table below.

Please rate the helpfulness of the following EU facilitated activities:

	Very helpful	Helpful	Less helpful	Not helpful	I do not know / NA
a) Member States should hold regular discussions on AMR within a dedicated network on AMR (One Health network), gathering experts from the public health,	X				



animal health and environmental sectors					
b) Member States should conduct voluntary peer-to peer reviews of their respective national action plans against AMR and discuss the results within the One Health network	X				
c) Member States should define measurable goals to reduce infections in humans and animals, the use of antimicrobials in the human and veterinary sector and antimicrobial resistance in all domains	X				
d) The European Commission should coordinate and facilitate the sharing of best practices and exchange of information on national action plans of Member States on AMR		X			
e) EU funds should be used to complement and help Member States in developing and implementing their national action plans against AMR	X				
f) The European Commission should complement awareness raising activities of Member States on AMR	X				
g) The European Commission should implement training programmes on AMR for Member States' competent authorities		X			
h) The European Commission should propose new EU initiatives in order to reduce antimicrobial use in people and the spread of AMR in humans	X				
i) The European Commission should propose new EU initiatives to reduce antimicrobial use in animals and agriculture and spread of AMR in/from these sources	X				
j) The European Commission should propose new EU initiatives to monitor antimicrobials and resistant microorganisms in the environment	X				
k) The European Commission should ensure stricter implementation by Member States' competent authorities of existing EU rules and measures that are designed to reduce the development and spread of AMR		X			



3.1.1. Please specify other concrete actions that could be helpful in ensuring greater coherence and fight against AMR.

Please limit your answer to 1500 characters:

**While Members states and the Commission have already taken various steps to tackle AMR, the extent of the results varies very much from one country to another. CPME emphasises the need for continued action, stricter surveillance and implementation of existing measures but also for taking further initiatives at EU level. To that end, all relevant stakeholders should be appropriately involved to ensure an adequate implementation, as it was done by ECDC for the development of EU guidelines on the prudent use of antimicrobials in human medicine.**

3.2. Please indicate your opinion on the following statements regarding EU surveillance systems:

	Strongly agree	Agree	Disagree	Strongly disagree	I do not know / NA
a) EU surveillance systems on <b>AMR in human medicine</b> [1] provide sufficient information to support actions aimed at preventing and controlling AMR in humans	X				
b) EU surveillance systems on <b>antimicrobial consumption in human medicine</b> [2] provide sufficient information to support actions aimed at preventing and controlling AMR in humans	X				
c) EU surveillance systems on <b>AMR in animals</b> [3] provide sufficient information to support actions aimed at preventing and controlling AMR in animal husbandry	X				
d) EU surveillance systems on <b>antimicrobial consumption in animals</b> [4] provide sufficient information to support actions aimed at preventing and controlling AMR in animal husbandry			X		
e) The <b>integrated analysis</b> [5] of the existing AMR and antimicrobial consumption data at EU level provides all the necessary information to support actions aimed at preventing and controlling AMR with a One Health approach	X				

3.2.1. Please provide concrete examples of further data not currently collected within the EU and which collection could be helpful in the fight against AMR. Please justify your rationale for collecting this data and limit your answer to 1500 characters:



One of the key issues in AMR is that of the naïve carriers. The AMR found anywhere in hospitals when the provoking germs have been determined is only the top of the iceberg. The hidden part includes healthy relatives. Action should be taken to identify carriers and help them prevent further dissemination through sound measures of hygiene: hand-washing, etc.

3.3. The 2011-2016 action plan against the rising threats from antimicrobial resistance focused mainly on actions in human medicine and veterinary medicine. There may be a need to propose further EU actions to tackle AMR in the environment.

Several possible actions are listed in the table below. For each of these please provide your opinion on their usefulness by ticking the appropriate box:

	Very useful	Useful	Less useful	Not useful	I do not know / NA
a) Limitation of antimicrobial discharges to the environment <b>from the pharmaceutical manufacturing process</b>	<b>X</b>				
b) Limitation of antimicrobial and resistant microorganisms discharges to the environment <b>from other possible hotspots</b> (e.g. urban wastewater treatment plants, hospitals, manure and slurry stores)	<b>X</b>				
c) Limitation of the <b>use of sewage sludge and animal manure/slurry as soil amendments</b> unless subject to composting or similar measures	<b>X</b>				
d) <b>Monitoring</b> of antimicrobials and resistant microorganisms in the <b>environment</b>		<b>X</b>			
e) Other ( <i>please specify</i> )					

3.4. Vaccination against infectious disease represents one way to reduce the need to use antimicrobials. Different actors could play a useful role in promoting vaccination in humans and animals.

Please choose whether you want to reply to this question for the human health sector, the animal health sector, both or it is not applicable to your association/organisation:

**X** Human health

Animal health

Not applicable



### 3.4.1. Human Health

In the following tables actors that could play a useful role in promoting vaccination are listed.

Please rank your choice from 1 to 7, with 1 being the MOST important and 7 being the LEAST important actor in promoting the uptake / use of vaccination:

	(1) Most important	(2)	(3)	(4)	(5)	(6)	(7) Least important
a) International organisations (e.g. WHO)					X		
b) European Commission				X			
c) Member States			X				
d) Pharmaceutical industry							X
e) Human healthcare providers (e.g. doctors, nurses, pharmacists)	X						
f) Non-Governmental Organisations (NGOs)						X	
g) Patients		X					

3.4.1.1. For the choice where you attributed the ranking (1) please give further details on what your expectations from this actor are and why this actor is preferred above the other actors. If your preferred actor is not listed in the table above, please specify it.

Please limit your answer to 1500 characters:

**Healthcare professionals are on the front line when it comes to vaccine promotion, especially in the light of growing vaccine hesitancy in Europe, along with patients' organisations and patients themselves. Having the closest contact to patients, doctors and other healthcare professionals but also patients' organisations can influence patients' choices and actions. Every contact and reach out opportunity to relevant groups should be used to communicate the importance of vaccination. The provision of easily accessible and understandable evidence-based information is of importance for patients to make informed decisions about their health. Member States, the Commission and international organisations are also key players in promoting vaccination and supporting awareness-raising activities.**



3.5. The use of rapid diagnostics should help ensure that only antimicrobials which are effective are used to treat infectious disease. Different actors could play a useful role in promoting the uptake / use of rapid diagnostics in humans and animals.

Please choose whether you want to reply to this question for the human health sector, the animal health sector, both or it is not applicable to your association/organisation:

Human health

Animal health

Not applicable

### 3.5.1. Human Health

In the following tables actors that could play a useful role in promoting rapid diagnostics' use are listed.

Please rank your choice from 1 to 7, with 1 being the MOST important and 7 being the LEAST important actor in promoting the uptake / use of rapid diagnostics in the human health and animal health sectors:

	(1) Most important	(2)	(3)	(4)	(5)	(6)	(7) Least important
a) International organisations (e.g. WHO)					X		
b) European Commission				X			
c) Member States			X				
d) Pharmaceutical industry							X
e) Human healthcare providers (e.g. doctors, nurses, pharmacists)	X						
f) Non-Governmental Organisations (NGOs)						X	
g) Patients		X					

3.5.1.1. For the choice where you attributed the ranking (1) please give further details on what your expectations from this actor are and why this actor is preferred above the other actors. If your preferred actor is not listed in the table above, please specify it.

Please limit your answer to 1500 characters:



Having access to better and faster diagnostics is a decisive factor for doctors to avoid prescribing unnecessary antibiotics. In this respect, equitable access to rapid diagnostic tools must be ensured by Members states while the Commission and international organisations can also provide support to the development of new diagnostics tools to facilitate and accelerate the detection and identification of pathogenic agents.

## 4. PILLAR II: BOOSTING RESEARCH, DEVELOPMENT AND INNOVATION

4.1. The table below lists actions which could help to reduce barriers to the development of new antimicrobial medicines, vaccines, diagnostic tests and alternative therapies.

For each option, please indicate your opinion on the potential benefits of the actions by ticking the appropriate box:

	High benefits	Medium benefits	Low benefits	I do not consider this a potential benefit	I do not know / NA
a) Promote dialogue between stakeholders [1] to discuss human and animal <b>antimicrobial development challenges</b>		X			
b) Promote dialogue between stakeholders [1] to <b>accelerate vaccine development for pathogenic bacteria</b> which are resistant to a wide range of antimicrobial drugs	X				
c) Promote dialogue between stakeholders [1] to discuss on the <b>regulatory framework for alternatives</b> to the use of antimicrobial drugs	X				
d) Promote research on <b>new economic models</b> for the development of antimicrobial products		X			
f) Other ( <i>please specify</i> )					

Other (*please specify*):



4.2. In your opinion, what are the main obstacles to bringing new antimicrobials to patients in Europe?

Please rate the importance of the listed obstacles:

	Very important	Important	Less important	Not important	I do not know / NA
a) Lack of funding in AMR R&D	X				
b) Lack of cooperation between publicly and privately funded research	X				
c) Lack of economic models incentivising R&D on AMR			X		
d) Challenging regulatory environment			X		
e) Lack of dialogue between R&D players, regulators, HTA bodies and payers			X		
f) Lack of coordination between Member States and the EU			X		
g) Other ( <i>please specify</i> )					

Other (*please specify*):

**Regarding section 4.2.b), reference can be made to the American initiative “CARB-X” (<https://www.phe.gov/about/barda/CARB-X/Pages/default.aspx>).**

4.3. In your view, which funding instruments could be important to stimulate R&D in AMR?

Please rate the importance of the listed funding instruments.

	Very important	Important	Less important	Not important	I do not know / NA
a) Funding via EU Framework Programme Horizon 2020 grant schemes		X			



b) The <a href="#">SME instrument</a> under Horizon 2020		X			
c) Loan-based funding instruments like <a href="#">InnovFin Infectious Diseases</a> provided jointly by the EC and the European Investment Bank (EIB)		X			
d) <a href="#">Inducement Prizes</a>		X			
e) <a href="#">Public Procurement of Innovative Solutions</a>		X			
f) R&D funding provided by EC's public-public partnership <a href="#">JPIAMR</a>		X			
g) R&D funding provided by EC's public-private partnership <a href="#">IMI</a>		X			
h) R&D funding provided by the European & Developing Countries Clinical Trials Partnership ( <a href="#">EDCTP</a> )	X				

4.4. In your view, should the EU develop a list of R&D priorities for resistant pathogens (as done on a global level by WHO)? *(one answer possible):*

Yes

No

No opinion

## 5. PILLAR 3: SHAPING THE GLOBAL AGENDA ON AMR

5.1. The table below lists international actions / activities through which the European Commission could help to tackle AMR internationally.

Please rate the usefulness of these actions / activities:

	Very useful	Useful	Less useful	Not useful	I do not know / NA
a) Reinforced cooperation and advocacy of EU AMR policies with normative international organisations (WHO, OIE, FAO/Codex Alimentarius) and international fora (e.g. G7, G20, UN)	X				



b) Foster bilateral partnerships with key EU trading partners and major regional/ global players (e.g. USA, Canada, Brazil, China, India, South-Africa)		X			
c) Contribute towards AMR capacity building in developing countries (e.g. on surveillance and monitoring of AMR)		X			
d) Contribute towards AMR capacity building in candidate, potential candidate and neighbouring countries (e. g. on surveillance and monitoring of AMR)	X				
e) Other ( <i>please specify</i> )					

Other (*please specify*):

5.2. The table below lists a number of mechanisms which the European Commission could use to tackle AMR internationally.

Please rate the usefulness of each of these actions / activities:

	Very useful	Useful	Less useful	Not useful	I do not know / NA
a) Non-binding cooperation	X				
b) Trade agreements or partnership agreements			X		
c) Capacity building	X				
d) Other ( <i>please specify</i> )					

Other (*please specify*):

5.3. The European Commission and the EU Member States have an opportunity to help tackle the development of AMR at a global level.

In the table below a number of regions are listed. Based on your opinion and knowledge, in which of these do you think the EU would have the greatest influence and should focus its efforts?

Please rank your choice from 1 to 9, with 1 being the MOST preferred and 9 being the LEAST preferred:



	(1) Most preferred	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9) Least preferred
a) North African region		X							
b) Sub Saharan African region			X						
c) North American region							X		
d) Central & South American region						X			
e) North Asian region								X	
f) Central Asian Region					X				
g) South Asian Region				X					
h) Pacific Region									X
i) European Region (non-EU)	X								

5.3.1. For the choice where you attributed the ranking (1) please give further details and elaborate on your key criteria for this decision.

Please limit your answer to 1500 characters:

**Considering the geographic proximity and the prevalence of antimicrobial resistance in some parts of the world, cooperation should be strengthened in priority with the North African region and European countries (non-EU countries), but also the Sub Saharan African and South Asian regions, in order to help them build capacity, strengthen their surveillance and control systems but also to share best practices.**