## QUESTIONNAIRE FOR ADMINISTRATIONS, ASSOCIATIONS AND OTHER ORGANISATIONS 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)'

Fields marked with \* are mandatory.

## INTRODUCTION

#### QUESTIONNAIRE FOR ADMINISTRATIONS<sup>[1]</sup>, ASSOCIATIONS AND OTHER ORGANISATIONS [2]

#### **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 <u>evaluation of the European Commission's 2011-2016 action plan against the rising threats</u> from antimicrobial resistance, published on October 2016
- The <u>Council conclusions on the next steps under a One Health approach to combat</u> <u>antimicrobial resistance</u> (10278/16) of 17 June 2016
- The <u>Commission communication to the European Parliament and the Council on the action</u> <u>plan against the rising threats from antimicrobial resistance</u> (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 <u>evaluation</u> 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.

#### **REPLIES TO THE QUESTIONNAIRE**

We invite administrations, associations and other organisations to take part in this consultation. A separate consultation has been launched for citizens.

This consultation includes questions on human health, animal health and the environment, following a One Health approach.

We invite administrations at national or subnational (e.g. regional) level to coordinate their replies with all appropriate services dealing with human health, animal health and the environment in order to submit one single reply.

In the case of organisations and other associations, some of the questions might be out of your policy scope. As answers to the entire questionnaire are mandatory, we have reserved the option 'I do not know / Not applicable (NA)' for such cases.

The questionnaire should take about 30 minutes to complete and there are opportunities to make written recommendations.

[1] For the purpose of this survey, administrations refer to both public administrations and private administrations with public service obligations.

[2] For the purpose of this survey, associations and other organisations refer to trade associations, professional associations, academia and scientific societies and organisations representing the interests of specific stakeholders.

[3] The One Health concept recognises that the health of people is connected to the health of animals and the environment.

## 1. INFORMATION ABOUT THE RESPONDENT

Please provide the following data on your organisation/association/administration:

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

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Ministry of Health, also on behalf of the Ministry of Economic Affairs and the Ministry of Infrastructure and Environment
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\* 1.2. Please enter the country where your organisation/association/administration is based:



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

- Yes
- No

\* In the interest of transparency, organisations and associations have been invited to provide the public with relevant information about themselves by registering in Transparency Register and subscribing to its Code of Conduct. If the organisation or association is not registered, the submission will be published separately from the registered organisations/associations.

\* 1.4. Please enter your e-mail address *(this data will not be made public)*:

\* 1.5. Please indicate the name of a contact person *(please note that the name will not be made public and is meant for follow-up clarification only)*:

\* 1.6. Do you consent to the Commission publishing your replies?

- a) Yes (On behalf of my organisation/association/administration I consent to the publication of our replies and any other information provided, and declare that none of it is subject to copyright restrictions that prevent publication)
- b) Yes, only anonymously (The replies of my organisation/association/administration can be published, but not any information identifying it as respondent)
- c) No (The replies provided by my of my organisation/association/administration will not be published but may be used internally within the Commission. Note that even if this option is chosen, your contribution may still be subject to 'access to documents' requests)\*

\* As set out in Regulation (EC) No 1049/2001, any EU citizen, natural, or legal person has a right of access to documents of the EU institutions, including those which they receive, subject to the principles, conditions and limits defined in this Regulation.

#### 2. IDENTIFICATION OF RESPONDENT

\* 2.1. Main sector of the responding organisation/association/administration (one answer possible):

- Public administration or private administration with public service obligations (other than payers)
- Payer (irrespective of status, i.e. public or private)
- Human healthcare provider
- Veterinary healthcare provider
- Patients and consumers
- Farmers and animal keepers
- Pharmaceutical industry
- Food industry
- Academia or scientific society
- NGO
- Other (please specify)

\* 2.1.1 Are you an umbrella organisation/association representing the interests of the stakeholders mentioned in question 2.1.? *(one answer possible)*:

- Yes
- No

\* 2.2. Please specify the geographic coverage of your organisation/association/administration *(one answer possible)*:

- International
- European
- National
- Sub-national/local

## 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	l 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, animal health and environmental sectors	۲	O	۲	۲	0
*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	۲	O	©	©	O

*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	۲	©	O	©	O
*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	۲	0	0		0
*e) EU funds should be used to complement and help Member States in developing and implementing their national action plans against AMR	0	۲	0	0	0
*f) The European Commission should complement awareness raising activities of Member States on AMR	©	©	۲	©	O
*g) The European Commission should implement training programmes on AMR for Member States' competent authorities	O	۲	O	O	O

*h) The European Commission should propose new EU initiatives in order to reduce antimicrobial use in people and the spread of AMR in humans	۲	۲	©	۲	O
*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	۲	©	©	©	©
*j) The European Commission should propose new EU initiatives to monitor antimicrobials and resistant microorganisms in the environment	۲	O	۲	۲	O
*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	۲	©	©	O	O

## 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:

Text of 100 to 1500 characters will be accepted

1based on EU surveillance data on the spread of resistant bacteria and the use of antibiotics (ab), compare and benchmark MS, initiate discussion on policy measures taken and advise governments to formulate targeted measures within their country 2follow up the implementation of EU guidelines on the prudent use of ab in human health care, trigger discussion on measures taken in MS 3have in place by 2018 specific acts under the Regulation on transmissible animal diseases on infection prevention measures, good management practices in animal husbandry and harmonized surveillance systems of animal pathogens 4ban on preventive use of ab in animals 5ban on the use in all animals of last resort ab which are currently not authorised for use for food-producing animals 6mandatory susceptibility test before using critically important ab in all animals 7discuss need for a harmonised approach to prevent emerging amr in animal husbandry with potential impact in public health (eg CPE) Slegislation on production of medicines by adding wastewater treatment requirements 9more stringent EU biocide legislation; to discourage use of desinfectants at the office or by consumers in the absence of proof that this use results in health benefits: a.add requirement to test desinfectants on their potential to further promote resistance b.for the authorisation of disinfectants, use more stringent efficacy tests 10analyse use of ab for crop production 11surveillance of amr in the environment

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

	Strongly agree	Agree	Disagree	Strongly disagree	l do not know / NA
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1		I			
*a) EU surveillance systems on <b>AMR in</b> <b>human medicine</b> [1] provide sufficient information to support actions aimed at preventing and controlling AMR in humans	۲	©	O	©	©
*b) EU surveillance systems on antimicrobial consumption in human medicine [2] provide sufficient information to support actions aimed at preventing and controlling AMR in humans		۲	۲	۲	۲
*c) EU surveillance systems on <b>AMR in</b> <b>animals</b> [3] provide sufficient information to support actions aimed at preventing and controlling AMR in animal husbandry		۲	۲	۲	۲
*d) EU surveillance systems on antimicrobial consumption in animals [4] provide sufficient information to support actions aimed at preventing and controlling AMR in animal husbandry	O	۲	O	O	O

- [1] European Antimicrobial Resistance Surveillance Network (EARS-Net)
- [2] European Surveillance of Antimicrobial Consumption Network (ESAC-Net)
- [3] Surveillance on zoonotic bacteria in animals and food by the European Food Safety Authority
- [4] European Surveillance of Veterinary Antimicrobial Consumption (ESVAC)
- [5] JIACRA report
- 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:

Text of 100 to 1500 characters will be accepted

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-improving surveillance of use of antibiotics in the EU. Currently not all
Member States provide these data, and
data that are provided are not equally comparable (sales data vs. data on
refunds by insurance companies)
- veteterinary:

mandatory monitoring of CPE
AMR surveillance of food imported from third countries on basis of a
risk analysis
promote surveilance of use of veterinary antimicrobials.
improve combining surveillance data/integration of surveillance data
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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	l do not know / NA
*a) Limitation of antimicrobial discharges to the environment <b>from the</b> <b>pharmaceutical</b> <b>manufacturing process</b>	۲	O	©	©	©
*b) Limitation of antimicrobial and resistant microorganisms discharges to the environment <b>from other</b> <b>possible hotspots</b> (e.g. urban wastewater treatment plants, hospitals, manure and slurry stores)	©	۲	O	O	O
*c) Limitation of the <b>use of</b> <b>sewage sludge and animal</b> <b>manure/slurry as soil</b> <b>amendments</b> unless subject to composting or similar measures	©		O	©	۲
*d) <b>Monitoring</b> of antimicrobials and resistant microorganisms in the <b>environment</b>	0	۲	0	0	0
e) Other <i>(please specify)</i>	0	0	0	0	0

\* 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:

- 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)	O	0	۲	0	0	0	0
*b) European Commission	O	O	O	۲	O	O	0
*c) Member States	۲	O	0	0	0	O	۲
*d) Pharmaceutical industry	0	0	0	0	۲	0	0
*e) Human healthcare providers (e.g. doctors, nurses, pharmacists)	O	۲	0	0	0	0	0
*f) Non- Governmental Organisations (NGOs)	O	0	0	۲	0	۲	۲
*g) Patients	O	0	0	O	O	۲	0

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:

Text of 100 to 1500 characters will be accepted

member states are responsible for health care policy, but international organisations play an important role in advising and promoting the use of vaccination in order to tackle amr
NB we interpret 'promoting' in the question 3.4.1. above as 'making vaccines available on the market and making vaccination available for citizens by the government' (i.e. we did not interpret it as promoting as in commercial advertisements)

#### 3.4.2. Animal 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. OIE, FAO)	O	0	۲	0	0	۲	0
*b) European Commission	O	O	۲	O	O	0	0
*c) Member States	O	0	O	۲	0	O	۲
*d) Pharmaceutical industry	O	0	0	0	۲	0	0
*e) Animal healthcare providers (e.g. veterinarians)	۲	©	0	0	0	0	0
*f) Non- Governmental Organisations (NGOs)	O	O	0	0	0	0	۲
*g) Farmers and animal keepers	۲	۲	0	0	0	0	0

3.4.2.1. 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:

Text of 100 to 1500 characters will be accepted

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EC en MS play an important role in regulation on the use and authorisation of vaccines.
Vets and farmer(organisations) play an important rol in the decison to use vaccines or other means if infection prevention or disease control
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\* 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)	O	0	۲	0	۲	0	0
*b) European Commission	0	O	0	O	O	۲	0
*c) Member States	O	0	۲	0	0	O	©
*d) Pharmaceutical industry	0	0	0	۲	0	0	0
*e) Human healthcare providers (e.g. doctors, nurses, pharmacists)	۲	0	0	0	0	0	O
*f) Non- Governmental Organisations (NGOs)	O	0	0	0	0	0	۲
*g) Patients	O	۲	O	0	O	©	©

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:

Text of 100 to 1500 characters will be accepted

They are in charge and in the position to apply these tests. And reimbursement improves uptake!

#### 3.5.2. Animal 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. OIE, FAO)	O	0	۲	0	0	۲	0
*b) European Commission	۲	0	0	O	۲	O	0
*c) Member States	0	O	O	۲		O	©
*d) Pharmaceutical industry	O	۲	0	0	0	0	0
*e) Animal healthcare providers (e.g. veterinarians)	۲	O	0	0	0	0	©
*f) Non- Governmental Organisations (NGOs)	O	©	0	©	©	0	۲
*g) Farmers and animal keepers	O	0	۲	0	0	0	0

3.5.2.1. 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:

Text of 100 to 1500 characters will be accepted

Vets are in charge and in position to apply these tests.

# 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	l do not consider this a potential benefit	l do not know / NA
*a) Promote dialogue between stakeholders [1] to discuss human and animal antimicrobial development challenges	©	۲	©	O	O
*b) Promote dialogue between stakeholders [1] to accelerate vaccine development for pathogenic bacteria which are resistant to a wide range of antimicrobial drugs	۲	۲	۲	۲	O
*c) Promote dialogue between stakeholders [1] to discuss on the <b>regulatory</b> <b>framework for alternatives</b> to the use of antimicrobial drugs	O	۲	O	0	0
*d) Promote research on <b>new economic models</b> for the development of antimicrobial products	۲	©	0	O	0
f) Other <i>(please specify)</i>	0	۲	0	0	0

[1] E.g. regulators, health technology assessment (HTA) bodies, pharmaceutical industry, healthcare payers, etc.

#### Other (please specify):

Text of 100 to 1500 characters will be accepted

promote dialogue between stakeholders to discuss a more efficient regulatory framwork for antibiotics, vaccins and diagnostic tests

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	l do not know / NA
*a) Lack of funding in AMR R&D	۲	©	0	O	0
*b) Lack of cooperation between publicly and privately funded research	۲	©	0	0	©
*c) Lack of economic models incentivising R&D on AMR	۲	©	0	O	0
*d) Challenging regulatory environment	0	۲	0	0	0
*e) Lack of dialogue between R&D players, regulators, HTA bodies and payers	O	0	۲		0
*f) Lack of coordination between Member States and the EU	0	0	۲	0	0
g) Other <i>(please</i> <i>specify)</i>	0	۲	0	0	0

Text of 100 to 1500 characters will be accepted

Lack of cooperation and good facilities for clinical trials with new antibiotics. Lack effective fit for purpose clinical trial design.

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	l do not know / NA
*a) Funding via <u>EU</u> <u>Framework</u> <u>Programme Horizon</u> <u>2020</u> grant schemes	0	۲	0	0	۲
*b) The <u>SME</u> <u>instrument</u> under Horizon 2020	0	۲	0	0	0
*c) Loan-based funding instruments like <u>InnovFin</u> <u>Infectious Diseases</u> provided jointly by the EC and the European Investment Bank (EIB)	O	۲	O	©	0
*d) <u>Inducement Prizes</u>	۲	0	0	0	0
*e) <u>Public</u> <u>Procurement of</u> <u>Innovative Solutions</u>	0	۲	۲	0	0

*f) R&D funding provided by EC's public-public partnership <u>JPIAMR</u>	©	۲	©	0	©
*g) R&D funding provided by EC's public-private partnership <u>IMI</u>	O	۲	©	0	©
*h) R&D funding provided by the European & Developing Countries Clinical Trials Partnership ( <u>EDCTP</u> )		۲	۲	0	0

\* 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	l 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)		۲	O	O	O
*b) Foster bilateral partnerships with key EU trading partners and major regional/ global players (e.g. USA, Canada, Brazil, China, India, South-Africa)	۲	©	©	©	©
*c) Contribute towards AMR capacity building in developing countries (e.g. on surveillance and monitoring of AMR)	۲	©	0	0	0
*d) Contribute towards AMR capacity building in candidate, potential candidate and neighbouring countries (e.g. on surveillance and monitoring of AMR)	۲	O	۲	۲	O
e) Other <i>(please specify)</i>	0	0	0	0	0

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	l do not know / NA
*a) Non-binding cooperation	۲	0	0	0	O
*b) Trade agreements or partnership agreements	۲	©	©	©	0
*c) Capacity building	O	۲	0	0	0
d) Other <i>(please specify)</i>	0	O	O	O	O

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	0	0	0	0	0	۲	0	0	0

*b) Sub Saharan African region	0	0	O	©	O	0	۲	0	O
*c) North American region	0	0	0	0	۲	0	0	0	0
*d) Central & South American region	0	0	۲	0	0	0	0	0	0
*e) North Asian region	0	0	0	0	0	0	0	۲	0
<b>*</b> f) Central Asian Region	0	۲	0	0	0	0	0	0	۲
<b>*</b> g) South Asian Region	۲	©	0	0	0	0	0	0	٢
*h) Pacific Region	0	0	0	0	0	0	0	0	۲
<b>*</b> i) European Region (non-EU)	0	0	0	۲	0	0	0	0	O

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:

Text of 100 to 1500 characters will be accepted

Based on the current use of antibiotics in livestock and the fact that use of antibiotics in animals is expected to nearly double in Brazil, Russia, China and South Africa by 2030. Also, the use of antibiotics in human medicine is high in these countries and not yet tackled enough.
NB regarding question 5.1.c. we consider this useful but also consider cooperation between the EU and MS towards AMR capacity building in developing countries as not optimal at the moment

#### Contact

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