



Dr Stella Kyriakides European Commissioner for Health and Food Safety <u>By email:</u> cab-kyriakides-contact@ec.europa.eu Rolstraat 29 1000 Brussels Belgium T +32 2 735 83 96 E info@pa-international.org

Brussels, 11 October 2023 Ref. nr.: 23.39831BB

Dear Dr Kyriakides,

In follow on to our correspondence on Antimicrobial Resistance (AMR) with the European Commission and notably with yourself and Commission President Dr Ursula von der Leyen dd 7 June 2021 and 22 July 2021, and in view of recent policy decisions, we kindly request your attention and support for potential and effective alternative paths to combat the still increasing threat of a global outbreak of AMR. In the past years the European Commission and the World Health Organization have taken the AMR threat ever more seriously and have engaged in series of appropriate measures, some of which indeed are legally binding. However, in certain instances, including related to the use of antibiotics in animal husbandry and the unlimited right of veterinarians in cooperation with industries to sell unlimited quantities of antibiotics to farmers, legally binding measures remain absent.

The once again increasing challenge to combat bacterial infections through antibiotics requires additional measures; however, in no way these should contribute to increased antibacterial resistance. In the attached article by renowned medical and microbial experts causes of increased resistance are critically addressed while alternative options are provided.

In a variety of industrial sectors deeply challenged by climatological change and the most serious of consequences for human health and the environment a call for 'mixed economic policy responses' is growing. A combination of elements of state and market should be considered to better control industrial policy both within national jurisdictions and outside these. This could notably involve the relevant United Nations institutions. An example of such a policy approach is the UN-initiated TB Alliance, including the stockpiling of the necessary medicines to combat tuberculosis where an outbreak is emerging. On that basis, through subsidies, taxes on (commercial) veterinary antibiotics use and through tax exemptions for farmers that switch to alternatives for antibiotics for animal growth and health promotion, change can be forged. In certain countries such as Denmark and Belgium these are already and successfully applied to antibiotics production and sales. Resistance of the industry against such measures is understandable but appropriate public-private partnerships could be considered to overcome complaints regarding these profit-influencing measures. For all governments involved the key question is to choose between the unacceptable cost of loss of human lives and public expenditure caused by a potential AMR outbreak and a certain control over industrial output.

Against this background the attached article critically highlights the potential consequences of the increased production of antibiotics by the pharmaceutical industry without a public-private framework that helps control both the production and the use of the antibiotics. It also commends the European Commission to now step away from pharmaceutical industry resistance against the authorisation of the bacteriophages – key lifesavers in specific AMR cases and a potential key element in sustainable antibiotics development.

Thank you very much for your views and insights on this matter. We are of course entirely at your availability for further consultation and information.

Yours sincerely,

Prof. Mark Eyskens Chairman Former Prime Minister of Belgium

Kr Danielle van Dalen Senior Science Advisor

Enclosure:

Article 'New approaches to combat Antimicrobial Resistance (AMR)?', by Louis Dillac,
Werner Christie, Danielle van Dalen and Rio Praaning Prawira Adiningrat, October 2023

CC:

- Ursula von der Leyen, President of the European Commission
- Pierre Delsaux, Director-General, Health Emergency Preparedness and Response Authority (HERA)

Dr Werner Christie Member of the Board Former Minister of Health of Norway

Dr Louis Dillac Science Advisor