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EXPERT PANEL ON EFFECTIVE WAYS OF INVESTING IN HEALTH

(EXPH)

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Opinion on

Managing antimicrobial resistance across the health system

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The EXPH adopted this Opinion at theth plenary on 2022
after the public hearing held on 2022

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27 **About the Expert Panel on effective ways of investing in health (EXPH)**

28

29 Sound and timely scientific advice is an essential requirement for the Commission to pursue
30 modern, responsive and sustainable health systems. To this end, the Commission has set
31 up a multidisciplinary and independent Expert Panel which provides advice on effective
32 ways of investing in health ([Commission Decision 2012/C 198/06](#)).

33

34 The core element of the Expert Panel's mission is to provide the Commission with sound
35 and independent advice in the form of opinions in response to questions (mandates)
36 submitted by the Commission on matters related to health care modernisation,
37 responsiveness, and sustainability. The advice does not bind the Commission.

38

39 The areas of competence of the Expert Panel include, and are not limited to, primary care,
40 hospital care, pharmaceuticals, research and development, prevention and promotion,
41 links with the social protection sector, cross-border issues, system financing, information
42 systems and patient registers, health inequalities, etc.

43

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The opinions of the Expert Panel present the views of the independent scientists who are members of the Expert Panel. They do not necessarily reflect the views of the European Commission nor its services. The opinions are published by the European Union in their original language only.

65

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69 opinion.

70

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98 **ABSTRACT**

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174 **EXECUTIVE SUMMARY**

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177 **MANDATE**

178 EU action on antimicrobial resistance (AMR) has been on the policy agenda for many years.
179 A wide range of measures has been put in place to fight AMR and promote a more prudent
180 and responsible use of antimicrobials in humans and in animals. It is important to note
181 that AMR is a cross sectoral issue and needs to be addressed at all levels and across all of
182 the One Health dimensions, acknowledging the interlinkages between humans, animals,
183 plants and the environment.¹

184 Commissioner Kyriakides was mandated by the Commission President to focus on the full
185 implementation of the European One Health Action Plan against Antimicrobial Resistance¹
186 and to work with our international partners to advocate for a global agreement on the use
187 of and access to antimicrobials.² The Commission actively engages with international
188 partners like the AMR Quadripartite Alliance [World Health Organization (WHO), Food and
189 Agriculture Organisation (FAO) World Organisation for Animal Health (OIE), and United
190 Nations Environment Programme (UNEP)], as well as G7 and the G20 in order to address
191 the AMR threat. In particular, it advocates for the revision of the 2015 AMR Global Action
192 Plan and supports inclusion of AMR in the global agreement on pandemic preparedness and
193 response on which the World Health Assembly agree on the 1 December 2021 to launch
194 negotiations.

195 In June 2017, the European Commission adopted the EU One Health Action Plan against
196 AMR.³ Under the plan, the Commission adopted the EU Guidelines on the prudent use of
197 antimicrobials in human health.⁴ The guidelines aim to reduce inappropriate use and
198 promote prudent use of antimicrobials in people. They target all actors who are responsible
199 for or play a role in antimicrobial use. This complements the EU Guidelines on the prudent
200 use of antimicrobials in animal health.⁵ The European Medicine Agency (EMA), the
201 European Food Safety Authority (EFSA) and the European Centre for Disease Prevention
202 and Control (ECDC) are all engaged in tackling AMR.⁶⁻⁸

203 Since the implementation of the 2017 AMR EU Action Plan, new policy initiatives have been
204 launched that reinforce action on AMR, for example:

- 205 - The new EU Regulation on veterinary medicines and medicated feed, which will
206 apply as of 28 January 2022. It provides for a wide range of concrete measures to
207 fight AMR and promote prudent and responsible use of antimicrobials in animals.
- 208 - In May 2020, the European Commission adopted the Farm to Fork Strategy, a tool
209 to help shape the EU's path towards sustainable food systems.⁹ It includes an
210 objective to reduce by 50% of the overall EU sales of antimicrobials for farmed
211 animals and in aquaculture by 2030.
- 212 - In November 2020, the Commission proposed legislative changes to the existing EU
213 health security framework as part of the European Health Union package,¹⁰
214 including strengthening of the mandates of ECDC and EMA and the creation of the
215 European Health Emergency Preparedness and Response Authority (HERA), which
216 will also cover work on AMR.
- 217 - Also as part of the European Health Union, the Commission adopted the
218 Pharmaceutical Strategy for Europe,¹¹ under which the Commission will explore new
219 types of incentives for innovative antimicrobials and consider in the review of the
220 pharmaceutical legislation to introduce measures to restrict and optimise the use of
221 antimicrobial medicines. Moreover, the strategy will also cover actions on improving
222 healthcare professionals' and European citizens' awareness on antimicrobial
223 resistance.
- 224 - In November 2020, the new Commission Implementing Decision (EU) 2020/1729
225 on the monitoring and reporting of antimicrobial resistance in zoonotic and
226 commensal bacteria was published.¹² This Decision is based on the latest scientific
227 opinions and addresses known implementation issues while scientifically responding
228 and ensuring continuity in assessing future trends in AMR.

229 - In March 2019, European Union Strategic Approach to Pharmaceuticals in the
230 Environment COM (2019) 128 final was adopted which covers also the antimicrobial
231 resistance in the environment.

232 Almost all EU countries have put in place One Health national action plans and strategies
233 on AMR¹³ and twice a year, the European Commission issues a progress report¹⁴ on the
234 implementation of the 2017 European One Health Action Plan against AMR.¹

235 There is a wealth of research and studies available on AMR, commissioned by the European
236 Commission and other international organisations.¹⁵ For example, the Organization for
237 Economic Cooperation and Development (OECD) has been providing an important
238 contribution to the understanding on the economic side of the burden of AMR and the cost
239 to health systems.¹⁶ According to ECDC, 75% of the health burden of AMR in the EU/EEA
240 is due to health care associated infections, while nearly 40% of the health burden of AMR
241 is caused by infections with bacteria resistant to last-line antibiotics such as carbapenems
242 and colistin.¹⁷ The Council Conclusions on the next steps towards making the EU a best
243 practice region in combatting antimicrobial resistance of June 2019 recognised the need
244 for more action across several areas.¹⁸

245 **Despite these developments, there are still challenges in effective**
246 **implementation of AMR policies across health systems.** This in part reflects the
247 complexity of AMR: involving a wide range of pathogens; requiring concerted efforts at all
248 levels; and engaging with stakeholders that include, but are not limited to: physicians,
249 nurses, pharmacists, microbiologists, hospital managers, policy-makers, and patients. The
250 Commission considers that there is a need for a systematic approach that considers the
251 health system as a whole, looking at institutional, behavioural and structural challenges
252 and opportunities, something that does not seem to have been covered in existing studies
253 so far.

254 However, the issues that need to be considered go far beyond the health system. AMR is
255 a good example of a One Health issue in which human health is connected to that of animals
256 and the environment. As a result, health systems both contribute to the emergence and
257 persistence of AMR in the environment and are impacted by it. However, knowledge gaps
258 still exist in understanding the environmental aspects of AMR and its relevance to health
259 systems. The 2017 EU AMR Action Plan has various projects addressing this issue [the
260 progress report: One Health European Joint Programme (EJP), Ecology from Farm to Fork
261 Of microbial drug Resistance and Transmission (EFFORT), Joint Programming Initiative on
262 AMR (JPIAMR), 3rd ERA-NET Co-fund).¹⁴ In addition, EFSA recently adopted an opinion on
263 "Role played by the environment in the emergence and spread of antimicrobial resistance
264 (AMR) through the food chain" following a self-mandate.¹⁹

265 The **target audience** of this opinion are EU institutions, national governments and health
266 authorities, as well as other stakeholders relevant to tackling AMR. The scope is EU rather
267 than global action. Also taking into account the limited competence in health, the opinion
268 should differentiate between action that can be taken at EU and at Member State levels.

269 The findings and recommendations of the Expert Panel opinion will feed into a new proposal
270 for a Council Recommendation on AMR to be issued later in 2022.

271 Questions for the Expert Panel

272 The Expert Panel is requested to provide a concise policy-oriented opinion with analysis
273 and recommendations on the following points:

- 274 1. Taking into account the One Health dimension of antimicrobial resistance (AMR),
275 including the role of the environment and of veterinary medicine in the emergence
276 and spread of AMR, what are necessary systemic¹ elements, conditions and

¹ This should include the whole health system – from prescriptions, to information for patients, infection prevention and control measures as well as other preventive measures, the structures and resources of health care systems, antimicrobial stewardship measures, and legislation that prevents sales of antibiotics 'over the counter' without a prescription

- 277 interventions of effective management of antimicrobial resistance (AMR) across, but
278 also beyond, the health systems that could translate into effective policy
279 interventions and National Action Plans (national and EU targets, core requirements
280 for antimicrobial stewardship and infection prevention and control standards, etc.)?
- 281 2. How might new technologies (e.g. digital apps, in vitro diagnostics) help tackle AMR
282 in health systems?
- 283 3. Taking also into account the existing studies (e.g. those by OECD and ECDC) on the
284 burden of diseases, where are the areas for most urgent investment across health
285 systems for maximum benefit to tackle AMR?
- 286 4. What concrete strategies can be recommended to Member States to implement
287 existing and planned policies to tackle AMR?
- 288

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289 **OPINION**

290 **1. Antimicrobial Resistance (AMR) and its impact**

291 **1.1. AMR**

292 As defined by the World Health Organization, "Antimicrobial Resistance (AMR) occurs when
293 bacteria, viruses, fungi and parasites change over time and no longer respond to
294 medicines, making infections harder to treat and increasing the risk of disease spread,
295 severe illness and death. AMR genes refer to the genes implicated in or associated with the
296 resistance to one or more antibiotics. Resistance can result from presence or absence of a
297 gene or specific mutations acquired spontaneously or through evolution over time. As a
298 result of drug resistance, antibiotics and other antimicrobial medicines become ineffective
299 and infections become increasingly difficult or impossible to treat".²⁰ These changes are,
300 mostly, as a result of spontaneous mutations that give the microorganism an evolutionary
301 advantage, for example when that mutation confers resistance to an antibiotic in an
302 environment where the microorganism is exposed to it.

303 Resistance is important because it threatens the progress that has been made with a
304 succession of antimicrobials; in effect there is a constant race between the ability of
305 humans to discover new antimicrobial agents and the microorganisms to acquire resistance
306 to them. Ultimately, this creates the risk that medicine could revert to the pre-antimicrobial
307 era, with profound implications for the management of infections and the ability to
308 undertake procedures that increase their risk, such as surgery inside body cavities. It is
309 not an exaggeration to say that the growth of AMR threatens the entire medical system as
310 it exists today. WHO has identified AMR as one of the top 10 global public health threats
311 facing humanity.²⁰

312 **1.1.1. AMR as a global problem**

313 AMR is now recognised as a major contributor to disease burden now and one of the
314 greatest threats to human health in the future. Quantifying this burden is complicated.
315 Data from many parts of the world, including many high-income countries, are missing or
316 incomplete. Estimates must also address the issue of attribution, deciding when a resistant
317 bacterial infection causes death or disability. Consequently, estimates from different
318 sources vary. However, the most comprehensive picture worldwide comes from a recent
319 study by the Global Burden of Disease programme. This combined data from a wide range
320 of sources, including surveillance networks, diagnostic laboratories, research studies, and
321 health facilities and used modelling techniques to estimate missing data. Their approach
322 included five components: number of deaths where infection played a role, proportion of
323 infectious deaths attributable to a given infectious syndrome, proportion of infectious
324 syndrome deaths attributable to a given pathogen, the percentage of a given pathogen
325 resistant to an antibiotic of interest, and the excess risk of death or duration of an infection
326 associated with this resistance. Recognising the challenge of attribution noted above, they
327 adopted a pragmatic solution by employing two counterfactuals, deaths attributable to AMR
328 (based on a scenario in which all drug-resistant infections were replaced by drug-
329 susceptible infections), and deaths associated with AMR (based on a scenario in which all
330 drug-resistant infections were replaced by no infection).

331 Using these two counterfactuals, they estimated that 4.95 million (95% uncertainty
332 interval (UI) 3.62–6.57 million) deaths were *associated* with bacterial AMR in 2019 and
333 1.27 million [95% UI 0.911–1.71] deaths were *attributable* to it.²¹ Whichever measure is
334 used, AMR caused more fatalities than HIV/AIDS or malaria, which caused 860,000 and
335 640,000 deaths respectively in the same year.

336 Looking beyond the aggregate figures, the authors looked at both the organisms (and
337 agents to which they were resistant) and the types of infections they caused.

338 The Global Burden of Disease study presented data by organism and type of infection
339 (categorised as a set of syndromes). In 2019, six pathogens were each responsible for
340 more than 250,000 deaths associated with AMR: *E coli*, *Staphylococcus aureus*, *K*
341 *pneumoniae*, *S pneumoniae*, *Acinetobacter baumannii*, and *Pseudomonas aeruginosa*,
342 listed in order of number of deaths. Together, these six pathogens accounted for 929,000
343 (95% UI 660,000–1,270,000) of the 1.27 million deaths (95% UI 0.911–1.71 million)
344 attributable to AMR and 3.57 million (95% UI 2.62–4.78 million) of the 4.95 million (95%
345 UI 3.62–6.57 million) associated with AMR globally in 2019. Six other pathogens were each
346 responsible for between 100,000 and 250,000 deaths associated with AMR: *M tuberculosis*,
347 *Enterococcus faecium*, *Enterobacter spp*, *Streptococcus agalactiae* (group B
348 *Streptococcus*), *S Typhi*, and *Enterococcus faecalis*. For deaths attributable to AMR, *E coli*
349 was the most important, followed by *K pneumoniae*, *S aureus*, *A baumannii*, *S pneumoniae*,
350 and *M tuberculosis*.

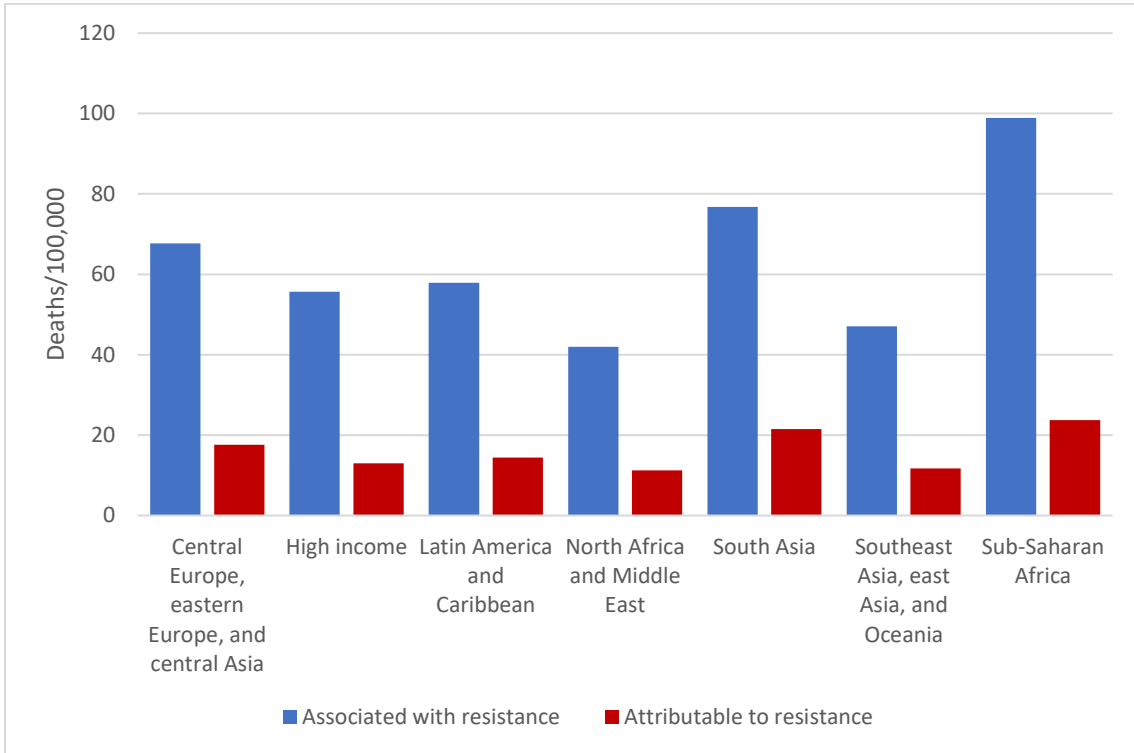
351 Three infectious syndromes dominated the global burdens attributable to and associated
352 with AMR. These were lower respiratory and thorax infections, bloodstream infections, and
353 intra-abdominal infections. Combined, they accounted for 78.8% (95% UI 70.8–85.2%) of
354 deaths attributable to AMR 2019. Consequently, measures to reduce the number of these
355 infectious syndromes and the risk of resistance associated with them are likely to be most
356 effective in reducing the burden of AMR.

357 There are large geographical variations in the scale and nature of deaths (**Figure 1**) and
358 Disability Adjusted Life Years (DALYs; **Figure 2**) associated with or attributable to AMR.
359 Note that the Global Burden of Disease uses regions defined by a mix of geographic and
360 economic characteristics. Thus, the High-Income region includes, alongside western
361 Europe, Australia, New Zealand, the USA, Canada, and countries in the lower cone of South
362 America and in East Asia. Central and Eastern Europe includes the post-2004 EU member
363 states (except Malta and Cyprus).

364 The disease burden is greatest in sub-Saharan Africa and South Asia, at 24 deaths per
365 100,000 population and 22 deaths per 100,000 population, respectively. Western sub-
366 Saharan Africa had the highest rate of deaths attributable to AMR, with 27.3 deaths per
367 100,000 population. However, there is considerable diversity with these regions.

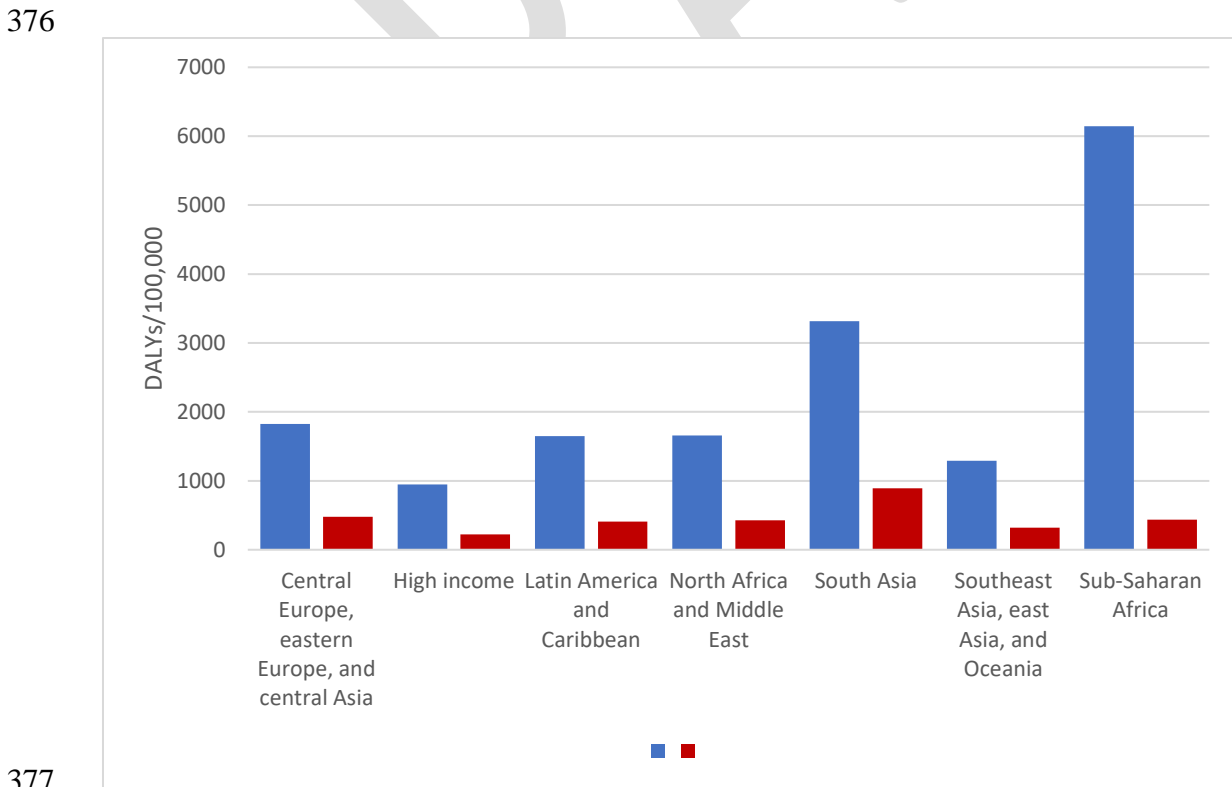
368

369 *Figure 1 All-age rate of deaths per 100,000 population associated with and attributable to bacterial antimicrobial resistance by region, 2019*
 370



371
 372 Source: Murray et al., 2022 ²¹
 373

374 *Figure 2 All-age rate of disability-adjusted life years (DALYs) per 100,000 population associated with and attributable to bacterial antimicrobial resistance by GBD region, 2019*
 375



377
 378 Source: Murray et al., 2022 ²¹
 379

380

381 **1.1.2. AMR in Europe**

382 ECDC and the WHO Regional Office for Europe collaborate to publish data from
383 antimicrobial resistance surveillance in Europe and obtained from invasive isolates (blood
384 and cerebrospinal fluid).²² The most recent data cover the year 2020. Although there are
385 differences among countries in terms of the microorganisms involved and the antimicrobial
386 groups to which they are resistant, it is possible to extract a few headlines. First, within
387 the EU/EEA, most reported bacterial species–antimicrobial combinations showed either a
388 significantly decreasing trend or no significant trend in population-weighted mean AMR
389 percentage during 2016–2020. The exceptions were carbapenem resistance in *Escherichia*
390 *coli* and *Klebsiella pneumoniae* and vancomycin resistance in *Escherichia faecium*, which
391 saw a significant increase during this period.

392 By 2020, more than half of *E. coli* isolates and more than a third of *K. pneumoniae* isolates
393 were resistant to at least one antimicrobial group, and combined resistance to several
394 antimicrobial groups was frequent. Carbapenem resistance remained rare with *E. coli*, but
395 almost a quarter of EU/EEA countries reported carbapenem resistance percentages above
396 10% for *K. pneumoniae*. Carbapenem resistance was also common with *Pseudomonas*
397 *aeruginosa* and *Acinetobacter* species. and at a higher percentage than with *K.*
398 *pneumoniae*.

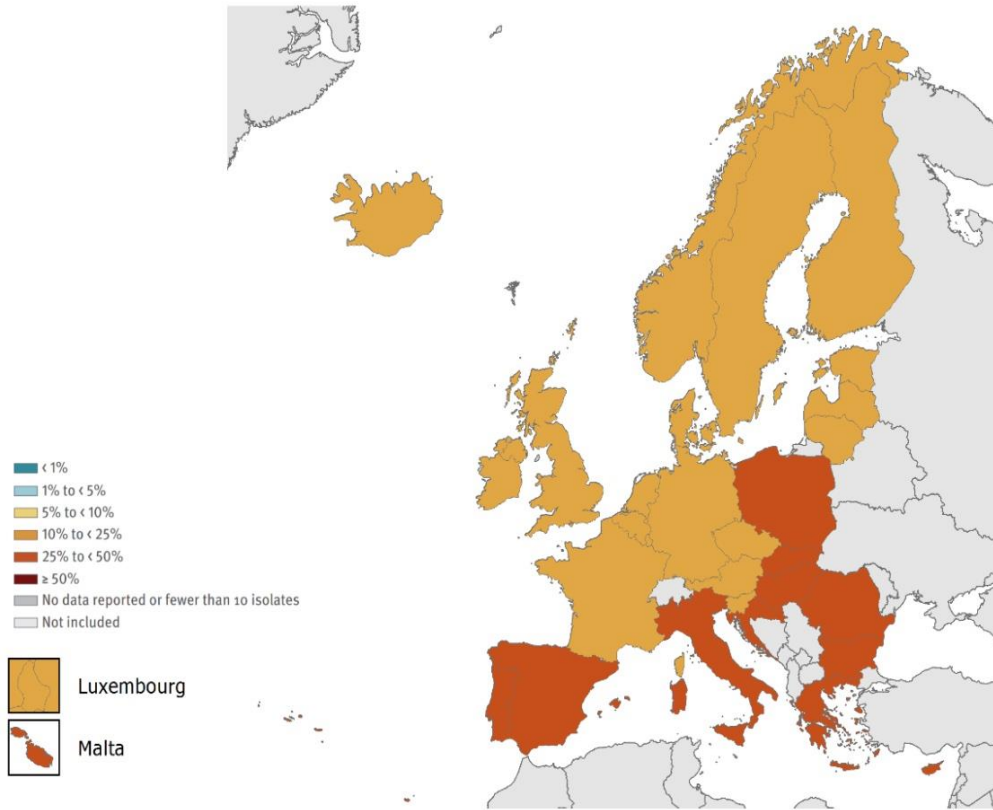
399 There was a reduction in the percentage of Methicillin-Resistant *Staphylococcus aureus*
400 (MRSA) during 2016–2020 but MRSA remains of concern, with high percentages in several
401 countries including Spain, Portugal, Italy, Austria, and Romania, and combined resistance
402 to another antimicrobial group is common. There was a downward trend in macrolide
403 resistance in *Streptococcus pneumoniae* during 2016-2020.

404 There is a clear north-to-south and west-to-east gradient of AMR in the EU/EEA, with higher
405 rates observed in the southern and eastern parts of the Region.²³ The gradient was more
406 pronounced for fluoroquinolone resistance in *E. coli*, (**Figure 3**), third-generation
407 cephalosporin and carbapenem resistance in *K. pneumoniae* and carbapenem resistance in
408 *Acinetobacter* species.

409

410

411 *Figure 3 Percentage of invasive E. coli isolates resistant to fluoroquinolones*
412 *(ciprofloxacin or/and levofloxacin or/and ofloxacin), by country, EU/EEA, 2019*
413

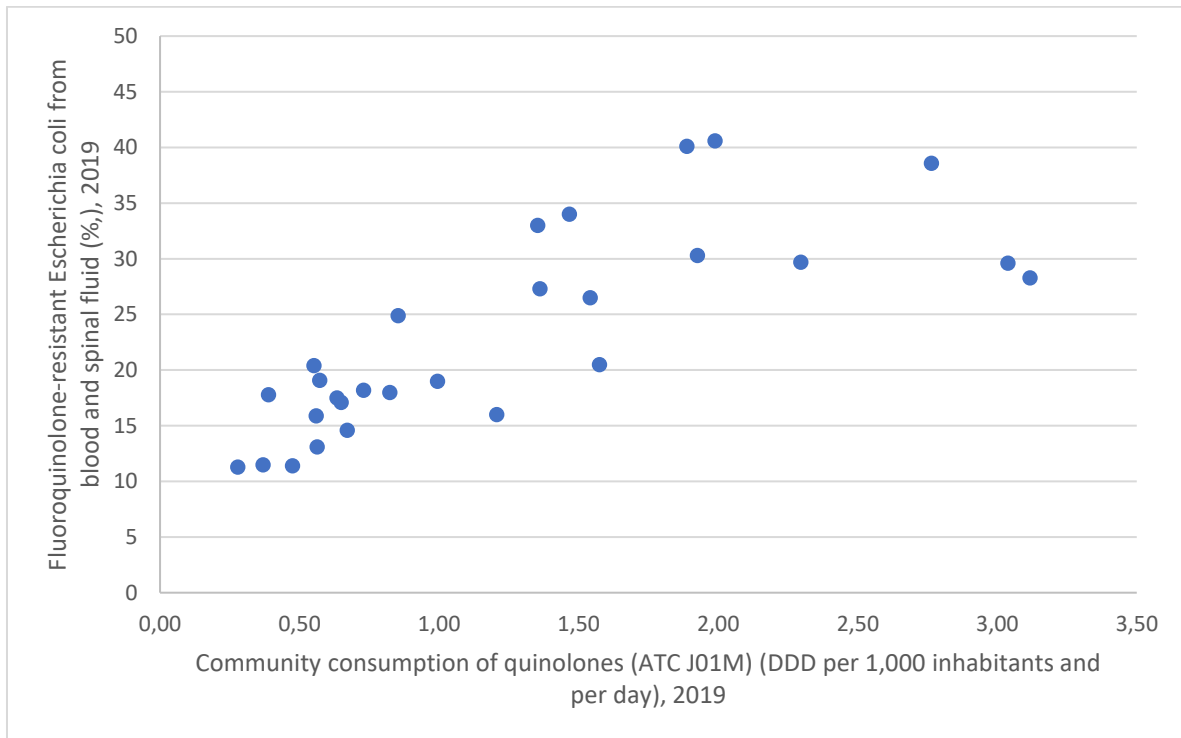


414
415 *Source: European Antimicrobial Resistance Surveillance Network (EARS-Net), ECDC* ²⁴

416
417 The pattern seen in **Figure 3** reflects antimicrobial consumption rates, as can be seen from
418 a plot of rates of fluoroquinolone-resistant *E. coli* and quinolone consumption (**Figure 4**).
419 This is consistent with a 2014 systematic review finding a clear association between
420 antibiotic consumption and rates of resistance.²⁵

421

422 *Figure 4 Association between use of and resistance to fluroquinolones in the EU28*
 423 *(2019)*



424
 425 *Source: EARS-Net and European Surveillance of Antimicrobial Consumption Network*
 426 *(ESAC-Net), ECDC, 2020.*

427 *Note: Each dot represents an EU/EEA country. *Excluding Cyprus and Czechia which only*
 428 *reported antibiotic consumption data for the community and hospital sector combined.*
 429 *†, Mostly fluoroquinolones. ATC, Anatomic Therapeutic Chemical classification code; DDD,*
 430 *defined daily doses*

431

432 **1.1.3. Antibiotic consumption in Europe**

433 Antimicrobial consumption in the EU/EEA is monitored by ECDC for humans and by the
 434 EMA for food-producing animals. In 2018, in 29 EU/EEA countries, 4,264 tonnes of
 435 antibiotics were used in humans corresponding to a mean antibiotic consumption of 133
 436 mg of active substance per kg estimated biomass, whereas 6,358 tonnes of antibiotics
 437 were used in food-producing animals corresponding to a lower mean antibiotic consumption
 438 of 105 mg per kg estimated biomass.²⁶

439 There is, however, a recognition of the need to reduce, as far as possible, the use of
 440 antibiotics. A particular target is their use in agricultural animals and there has been a 43%
 441 decrease in use between 2011 and 2020 in the 25 countries with consistent reporting.
 442 However, there was little change in the antibiotic consumption in humans.²⁷ In animal
 443 health antibiotics have been deliberately used in the past for reasons other than to treat
 444 disease, such as growth promotion. In the EU growth promotion with antibiotics as part of
 445 feed was banned in 2006 and the 2019 Veterinary Medicinal Products Regulation banned
 446 it completely as of 2022, alongside several other measures.²⁸

447 In 2019, the mean total (community and hospital sector combined) consumption of
 448 antibacterials for systemic use in humans in the EU/EEA was 19.9 defined daily doses
 449 (DDD) per 1,000 inhabitants per day (country range: 9.5–34.1).²⁹ (**Table 1**). Most
 450 (approximately 90%) antibiotic consumption in humans takes place in the community,
 451 although the proportion of patients receiving an antibiotic on a given day is much higher
 452 in acute care hospitals (EU/EEA: 31% or 460 DDD per 1,000 patients per day) than in the
 453 community.³⁰

Managing antimicrobial resistance across the health system

454 During the period 2011–2019, a decreasing trend in total antibiotic consumption was
 455 apparent in the EU/EEA overall, with large reductions in some countries (**Table 1**). Yet
 456 despite these overall reductions, the relative use of broad-spectrum antibiotics, having an
 457 antimicrobial spectrum which includes some gram-positive and some gram-negative
 458 organisms, in humans increased,²⁹ and the remaining variability across countries show that
 459 further reductions are possible.

460 *Table 1 Total consumption (community and hospital sector combined) of antibacterials*
 461 *for systemic use (ATC group J01) by country, EU/EEA, 2010–2019 (expressed as DDD per*
 462 *1,000 inhabitants per day)*

Country	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Netherlands	10.9	11.0	10.9	10.5	10.3	10.4	10.1	9.8	9.7	9.5
Austria	13.1†	12.7†	12.2†	14.2†	12.1†	12.1†	11.4†	11.9†	10.4†	11.4
Germany	13.4†	13.1†	13.7†	14.5†	13.4†	13.1†	12.8†	12.3†	11.9†	11.4†
Estonia	11.4	12.4	12.2	12.0	11.9	12.1	12.0	11.6	11.8	11.8
Sweden	15.2	15.4	15.3	14.2	14.0	13.5	13.2	12.8	12.4	11.8
Slovenia	13.4	13.4	13.2	13.3	13.1	13.3	13.0	13.1	13.2	13.0
Latvia	12.6	12.9	12.9	13.3	12.6	13.1	12.9	13.9	13.3	13.9
Hungary	14.8	14.9	14.1	14.5	15.2	15.8	14.4	14.6	14.8	14.4
Finland	19.7	21.5	20.6	19.6	19.1	18.1	17.4	15.7	15.5	14.7
Norway	16.8	17.5	17.9	17.2	16.9	16.8	16.2	15.7	15.3	14.9
Denmark	17.5	18.3	17.4	17.5	17.1	17.5	17.0	16.2	15.6	15.3
Lithuania	14.4	15.5	15.3	17.1	15.1	15.8	16.6	16.6	16.3	16.1
Czechia	16.0†	16.5†	15.7†	16.9†	17.1†	17.4†	na	na	na	16.9
Croatia	18.8	18.2	20.0	19.2	19.4	19.7	18.7	18.6	18.8	18.8
United Kingdom	16.5†	16.5†	17.7†	20.4	20.8	20.1	19.7	19.3	18.8	18.8
Slovakia	na	21.4†	19.7	23.2	21.2	24.2	23.6	20.0	22.0	19.3
Portugal	19.9	20.6	20.1	17.6	18.0	18.8	19.0	18.3	18.6	19.3
EU/EEA*	20.9	20.9	21.0	21.5	21.1	21.5	20.7	20.2	20.1	19.4
Iceland	19.8	19.8	19.7	19.4	17.1†	17.6†	18.2†	18.8†	20.4†	19.5†
Bulgaria	17.2	18.3	17.4	18.6	20.0	20.1	19.2	20.5	21.0	20.7
Malta	19.9	21.6	20.8	22.2	22.4	21.2	20.9	22.6	20.9	20.7
Luxembourg	25.1	25.2	25.0	25.0	23.2	23.5	22.9	22.6	22.2	21.1
Belgium	24.9	25.4	25.6	24.2	24.0	24.4	24.2	22.8	22.3	21.4
Italy	24.9	25.1	24.6	25.2	24.5	24.5	24.0	20.9	21.4	21.7

Ireland	19.0	20.8	21.0	21.6	21.0	23.0	22.0	20.9	22.7	22.8
Poland	18.0†	18.2†	19.9†	20.5†	21.2	24.1	22.0	25.4	24.4	23.6
Spain	16.2‡	16.6‡	15.7‡	16.2‡	17.1‡	17.5‡	27.5	26.8	26.3	24.9
France	25.0	25.1	25.7	25.9	24.9	25.6	25.6	24.7	25.3	25.1
Romania	na	26.5	25.9	26.8	26.6	28.0	24.4	24.5	25.0	25.8
Cyprus	26.3	26.9	25.1	23.9	22.2	26.6	28.4	28.9	28.0	30.1
Greece	35.6	33.4	29.9	29.8	31.0	33.2	33.1	34.2	34.0	34.1

463 *Source: ESAC-Net, ECDC* ²⁹

464 *Note: **, EU/EEA refers to the EU/EEA population-weighted mean consumption based on
 465 reported or imputed data from 30 EU/EEA countries; †, Community data only (data from
 466 the hospital sector were not reported); ‡, Spain reported reimbursement data for 2011-
 467 2015 and changed to sales data in 2016; na, not available.

468

469 **1.1.4. Antibiotics consumption and Covid-19**

470 Important changes in antibiotics prescription have been observed within the COVID-19
 471 pandemic. Data from the ECDC show in most EU/EEA countries a decrease in the total
 472 antibiotic consumption in humans between 2019 and 2020.² This trend was mostly
 473 observed in primary care.

474 Among COVID-19 patients, a recent meta-analysis revealed an overall high antimicrobial
 475 consumption of 68%.³ A subgroup analysis found a lower consumption in high-income
 476 countries compared with lower and middle-income countries (58% vs 89%). The high
 477 antimicrobial consumption reported in COVID-19 patients demands implementation of
 478 appropriate antimicrobial stewardship interventions.

479 Further evaluations must confirm the sources of variation of antibiotic consumption within
 480 the pandemic and the need to address inappropriate antibiotic prescription with
 481 antimicrobial stewardship.

482

483 **1.1.5. Knowledge, attitudes, and beliefs about antibiotics in Europe**

484 The European Commission has undertaken a series of European surveys assessing the
 485 knowledge, attitudes, and beliefs concerning antibiotics in Europe. These were conducted
 486 in 2009, 2013, 2016, and most recently in 2018.³¹ In the 2018 survey, 32% of respondents
 487 reported having taken antibiotics orally in the preceding 12 months, a small decrease from
 488 34% in 2016. The highest percentage was in Italy, at 47%, while the lowest were in
 489 Sweden (20%) and the Netherlands (21%). These figures decreased in most member
 490 states, with the largest decreased being observed in Romania (-10 percentage points),
 491 followed by Luxembourg, Greece, and Malta. The largest increase was in Denmark (+5
 492 percentage points).

493 The vast majority of respondents had received their last course of antibiotics from a
 494 healthcare professional (93%), either based on a prescription dispensed at a pharmacy
 495 (72%) or directly from a medical practitioner (21%), while 7% of antibiotic courses were
 496 obtained without a prescription, a figure that was unchanged since 2016.

497 Respondents were asked questions to test their knowledge about antibiotics. Only 25% got
 498 all four answers right, although there was a very small increase in knowledge since 2016

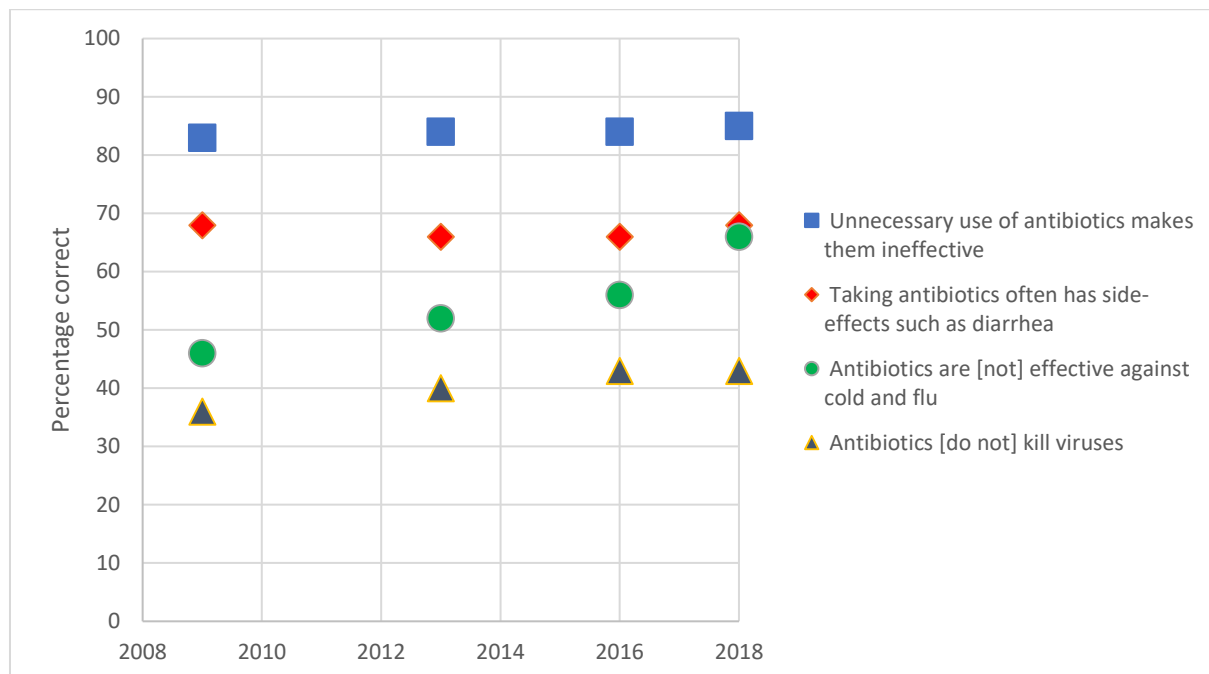
² <https://www.ecdc.europa.eu/en/news-events/reported-decrease-antibiotic-consumption-across-eueea-during-covid-19-pandemic>

³ <https://www.tandfonline.com/doi/full/10.1080/14787210.2022.2011719>

499 (0.1 on a scale of 1-4). The highest levels of knowledge were in Finland and Sweden, and
 500 the lowest in Latvia and Romania. Only less than half (43%) of respondents knew that
 501 antibiotics were ineffective against viruses. The ways in which these figures have changed
 502 since 2009 are shown in **Figure 5**.

503
 504

Figure 5 Knowledge about antibiotics in the EU, 2009-2018



505
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Source: Eurobarometer ³¹

507 A third (33%) of respondents recalled receiving information in the previous 12 months
 508 about not taking antibiotics unnecessarily. This was unchanged since 2016. The figure was
 509 the highest in Finland, at (59%), which was the only member state where most of the
 510 population had received such advice, and the lowest in Romania (14%).

511 **1.2. What contributes to the spread of AMR? A One health approach (within and**
 512 **beyond health systems) - the role of humans, animals, and the**
 513 **environment**

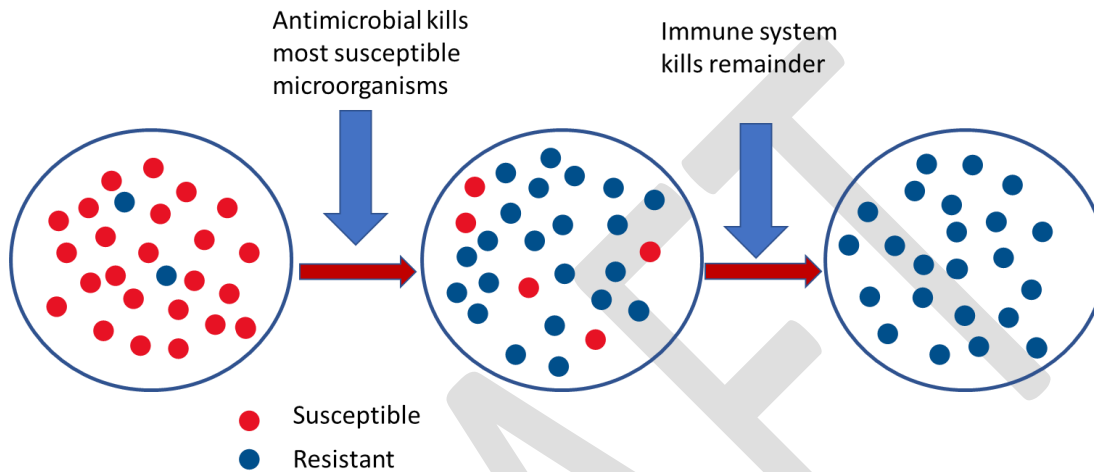
514 **1.2.1. The spread of AMR and one health approach**

515 In developing our approach to AMR we conceive the problem as a consequence of evolution
 516 of bacteria. AMR arises mainly because of random genetic mutation in a microorganism
 517 (for the present purposes we note, but set to one side, the transmission of resistance
 518 between microorganisms via plasmids). When a population of microorganisms is exposed
 519 to an antimicrobial agent, those susceptible to it will stop reproducing or be killed, as long
 520 as the concentrations of the antimicrobial are adequate over a long enough period (**Figure**
 521 **6**). However, it is possible that some, perhaps a few in several million, by chance possess
 522 a genetic mutation that confers resistance to the antimicrobial. Fortunately, when such
 523 microorganisms are causing an infection in a human or other animal, the various elements
 524 of the immune system will act to kill the by now greatly diminished numbers of
 525 microorganisms, including those that are resistant to the antimicrobial in question.
 526 However, there are circumstances when this will not happen and the initially very few
 527 resistant micro-organisms are able to thrive. Most commonly this is because they are
 528 exposed to low levels of the antimicrobial or for inadequate durations to allow the immune
 529 system to eliminate the infection. This is most likely to occur with infectious agents that

530 require long, and in some cases lifelong periods of treatment, such as tuberculosis or HIV,
531 so that treatment involves a combination of agents, each acting in different ways, as the
532 probability that a micro-organism has genes conferring resistance to more than one of
533 them is very small. Other situations include when the infection is overwhelming, the
534 microorganisms are growing in tissues that the antimicrobial cannot reach in adequate
535 amounts (such as areas of necrosis) or, especially when the host is a human, they are
536 immunocompromised. In those circumstances the by now resistant microorganism may
537 survive and given the opportunity, spread to others.

538 *Figure 6 The development of AMR*

539



540

541 Source: authors' compilation

542

543 Once a micro-organism has one or more genes conferring resistance, it has an evolutionary
544 advantage in any other situation where it is exposed to the antimicrobial in question. This
545 explains the transmission of antimicrobial-resistant microorganisms between humans,
546 between animals, and between humans and animals and the environment.³²

547 Niegowska and Wögerbauer have identified five broad categories within which there are
548 factors that contribute to the spread of AMR: ³³

549

550 - **Animal farming**

551 The use of antibiotics in animals, either as growth promoters, banned in the EU since 2006,
552 or to compensate for poor standards of animal welfare and thus hygiene, inevitably
553 increases the risk of resistance emerging. Vegetables may then be contaminated with
554 antibiotic-resistant bacteria from animal manure used as fertilizer. Antibiotic-resistant
555 bacteria can spread to humans through food and direct contact with animals.

556

557 - **Environment**

558 Wastewater can be contaminated with antibiotics or with resistant bacteria, and in some
559 cases AMR genes transfer. The major sources are health care facilities, pharmaceutical
560 manufacturing plants, agricultural premises, and aquaculture facilities. The presence of
561 antibiotics at low levels in the environment creates the conditions that encourage
562 resistance to emerge.

563

564 - **Community**

565 Inappropriate use of antimicrobials in the community, for example, when antibacterials are
566 prescribed for viral illnesses or when they are given in sub-therapeutic doses or for
567 inadequate periods, creating the conditions in which the immune system fails to clear them,
568 thus encouraging the development of AMR.

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- **Healthcare facilities**

Healthcare facilities are settings that permit or encourage the emergence of AMR in many ways. These include actions that increase the risks of infection (nosocomial infections). While some infections will be inevitable, many represent failures at various points in the patient journey. They include poor hygiene, inadequate pre-operative preparation, medical errors (such as unintended perforation of the gut), poor post-operative rehabilitation (leading to respiratory, urinary, or skin infections), and failure to identify and treat signs of infection early, leading to sepsis.

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Health facilities, like any facility in which large numbers of people are brought together, such as prisons, mines, or even cruise ships, can act as institutional amplifiers, where rising levels of infection, including those resistant to antimicrobials, eventually spill into the wider community.³⁴

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- **Travel**

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As with any microorganism, human movement facilitates the global spread of resistant bacteria and AMR genes transfer. Travellers that require hospital care while visiting a country with high prevalence of antimicrobial resistance, within or outside of the EU, and who are subsequently repatriated to their home country, may return being colonised or even infected by multidrug-resistant bacteria. Even without having been in contact with healthcare, people who travel in a country with high prevalence of antimicrobial resistance may return being colonised by multidrug-resistant bacteria. There has been a heightened awareness of this in recent years with respect to the prevalence of infection or colonization with drug-resistant organisms in people who experience short-term international travel, economic migration, and forced displacement from conflict or other disasters.³⁵ High-income countries are more likely to be recipient nations for AMR originating from middle- and low-income countries. A systematic review of literature until June 2019 showed that the most common origin of travellers with resistant bacteria is Asia, covering 36% of the total isolates. Beta-lactams and quinolones were the most documented drug-resistant organisms, accounting for 35% and 31% of the overall drug resistance, respectively.³⁶ Health systems should identify recent travellers to ensure that adequate precautions are taken.

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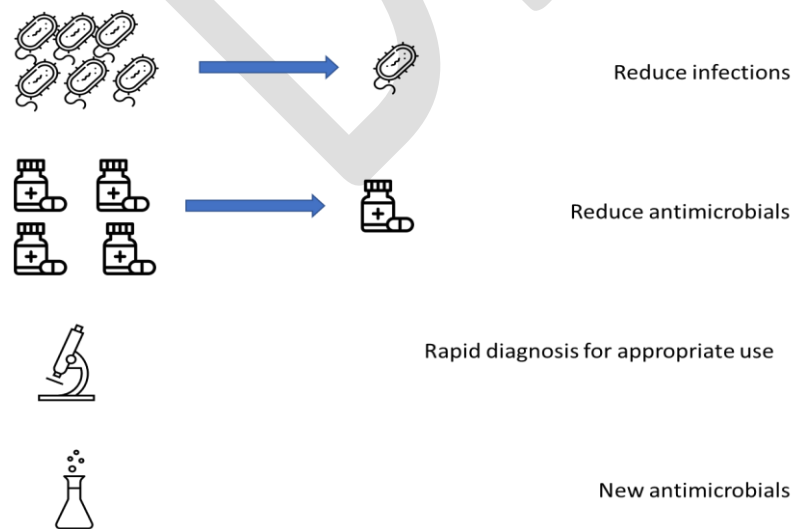
1.2.2. Measures to tackle AMR

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It follows from the discussion above on the reasons why AMR occurs that there are essentially four ways to reduce it (**Figure 7**).

603

Figure 7 A taxonomy of approaches



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605

Source: authors' compilation

606 Most obviously, anything that reduces the number of infections will reduce both the number
607 of resistant infections and the risk that infections with micro-organisms initially susceptible
608 to antimicrobials acquire resistance. Given the diverse settings in which infections can
609 arise, the range of measures that can be employed is vast. In agriculture they include
610 improved animal welfare standards, with an emphasis on reducing overcrowding and
611 improving hygiene. In the community, they include ensuring supplies of clean water and,
612 as has become increasingly understood during the pandemic, clean air, with measures such
613 as improved ventilation and filtration to reduce spread of airborne pathogens. It should be
614 recalled that infections often exhibit a steep social gradient and many are, in effect,
615 diseases of poverty. In health facilities, they include measures that span the entire patient
616 journey, from rapid detection of infections on admission, pre-operative assessment, skilled
617 surgical technique, rapid identification of complications, including early signs of sepsis, and
618 effective rehabilitation, all underpinned by high levels of hygiene, surveillance, and
619 infection control. Finally, as the experience with SARS-CoV-2 has shown, advances in
620 vaccine development, in particular those using mRNA, offer great potential for reducing
621 the burden of infection, just as earlier vaccines have done.

622 Reducing the quantity of antimicrobials used can be achieved by limiting their use to
623 situations where they are necessary. Examples include bans on their use as growth
624 promoters in agriculture or in aquaculture. It can also be achieved by reducing their levels
625 in the environment, for example by controls at pharmaceutical manufacturing plants or
626 health facilities.³⁷

627 Ensuring that when they are used, antimicrobials are used appropriately. This requires
628 stewardship, medicines management and prescribing policies, as well as rapid and accurate
629 diagnosis of infections, rapidly differentiating bacterial from viral infections and ensuring
630 that individuals are not treated with an antimicrobial to which their infection is already
631 partially resistant and thus, likely to amplify the existing level of resistance. This will also
632 reduce the amount of antibacterial used. It is equally important that the antibiotic (as much
633 as possible) only works against the causative bacteria and not against another (narrow
634 spectrum).

635 As noted above, there is a particular risk with infections that persists for long periods, such
636 as tuberculosis, where the emergence of resistance is reduced by use of combination
637 therapy. It also involves ensuring that treatment is continued long enough for the immune
638 system to eliminate the infection, with continued monitoring as appropriate to detect early
639 signs of resistance emerging. For acute infections, it is important to ensure a high enough
640 dose (as underdosing can lead to resistance) and that the duration of the treatment is as
641 short as possible.³⁸

642 The final approach is to discover and develop new antimicrobials, ideally acting in different
643 ways from existing ones, and so where there is less likelihood of pre-existing resistance.
644 For completeness, it is also necessary to mention alternative approaches, such as the use
645 of phages, viruses that attack bacteria, although despite many attempts to employ.

646 Measures to reduce the amount of infection and of antimicrobials used, and to improve
647 appropriate use of antimicrobials, can only be implemented if the adequate therapeutic,
648 diagnostic and preventative medical countermeasures are developed and accessible. Thus,
649 measures promoting the research, innovation, and development, addressing supply chain
650 vulnerabilities, and ensuring access are required for old and new antimicrobials, rapid
651 diagnostic devices and vaccine against resistant pathogens.

652 Tackling AMR will require all these measures. This will require a comprehensive approach,
653 in which the different elements are closely aligned. Drawing on a recent report prepared
654 for the G7 in 2021,³⁹ we identify four broad areas within which to move forward.

655 **1.2.3. Understanding context, culture, and behaviours**

656 Reducing the burden of AMR is not simply a technical matter. The decisions that give rise
657 to it are influenced by the social and economic contexts in which they are made. There are

658 often powerful incentives to make decisions that increase the risk of AMR, for example,
659 financial pressures to prescribe certain medications or fear of failing to treat what might
660 turn out to be a serious bacterial infection. Decisions are also made within professional
661 hierarchies, which may reduce opportunities for evaluation of all the necessary evidence
662 or perpetuate inappropriate behaviours.⁴⁰ This topic will also be considered in our Opinion.

663 **Policy and strategic planning**

664 A sustained reduction in the burden of AMR will only be achieved if it is adopted as a priority
665 at all levels, within countries, regional groupings such as the European Union, and globally.
666 A majority of WHO member states have adopted National Action Plans to reduce AMR. The
667 WHO has identified four objectives that these plans should contain. First, they should
668 promote improved awareness and understanding of AMR, based on effective
669 communication, education and training. Second, they should strengthen knowledge and be
670 evidence-based through surveillance and research. Third, they should reduce the incidence
671 of infection through effective sanitation, hygiene, and infection prevention. Fourth, they
672 should include measures to optimise antimicrobials in human and animal health. In
673 practice, however, these plans vary in their quality, comprehensiveness, and
674 implementation. Previous analyses suggest that few include a strategic management
675 framework that enables agile responses to emerging threats. In particular, there is often
676 a lack of the intersectoral collaboration that is needed linking health, agriculture, and the
677 food industry.³⁷ Integration of public health into primary and community health care is also
678 important. Consequently, this Opinion will review the extent to which member states have
679 adopted and implemented appropriate plans and have put in place the means to implement
680 them.

681 **Medicines management and prescribing systems**

682 Medicines management requires that the right antimicrobials, of high quality, are available
683 in sufficient quantity when required. However, in practice, there are many reasons why
684 this does not happen. They include problems of procurement and distribution, including
685 substandard and counterfeit medicines,⁴¹ and inadequate access and affordability by those
686 who need them. Even if they are available, they may not be used appropriately. They may
687 be prescribed inappropriately for patients with infections or without infection that will not
688 benefit from them, or courses of treatment may be terminated early. In circumstances
689 where there is already widespread resistance, the careless use of antimicrobials of last
690 resort can encourage the emergence of resistance to them. Consequently, this Opinion will
691 consider how appropriate antimicrobials can be made available where they are needed and
692 how their inappropriate use can be reduced.

693 **Antimicrobial stewardship (AMS) and multimodal strategies**

694 Some countries have developed and implemented functioning antimicrobial stewardship
695 (AMS) to monitor and direct the appropriate use of antimicrobial agents to achieve the best
696 clinical outcomes and minimize selective pressure and adverse events.

697 AMS is a systematic and coordinated approach to optimising antimicrobial use.⁴² Its
698 purpose is to promote the prudent use of antibiotics in order to optimize patient outcomes
699 while at the same time minimizing the probability of adverse effects, including toxicity and
700 the selection of pathogenic organisms, and the emergence and spread of antibiotic
701 resistance.⁴³ Elements include empirical treatment according to local or national guidelines,
702 de-escalation of treatment, parenteral-to-oral switch, therapeutic drug monitoring, and
703 restricted antimicrobial lists, all of which have been shown to produce benefits in terms of
704 clinical outcome, adverse events, treatment costs, and antibiotic resistance.⁴⁴

705 Successful AMS programmes are multidisciplinary and aligned with an organisation's
706 governance systems. They comprise a suite of coordinated strategies and interventions to
707 promote the optimal use of antimicrobials, tailored to patients' needs. These can be
708 enabling measures, which facilitate appropriate antibiotic treatment, or restrictive ones,
709 that reduce undesirable antibiotic-related decisions. Both are effective but enabling

710 interventions tend to achieve greater acceptance and improve the sustainability of
 711 restrictive ones.⁴² The essential elements of AMS programmes are outlined in **Table 2**.

712 *Table 2. Advantages and disadvantages of antimicrobial stewardship measures*

Strategy	Procedure	Personnel	Advantages	Disadvantages
Education/guidelines	Creation of guidelines for antimicrobial use	Antimicrobial committee to create guidelines	May alter behavior patterns	Passive education likely ineffective
	Group or individual education of clinicians by educators	Educators (physicians, pharmacists)	Avoids loss of prescriber autonomy	
Formulary/restriction	Restrict dispensing of targeted antimicrobials to approved indications	Antimicrobial committee to create guidelines	Most direct control over antimicrobial use	Perceived loss of autonomy for prescribers
		Approval personnel (physician, infectious diseases fellow, clinical pharmacist)	Individual educational opportunities	Need for all-hours consultant availability
Review and feedback	Daily review of targeted antimicrobials for appropriateness	Antimicrobial committee to create guidelines	Avoids loss of autonomy for prescribers	Compliance with recommendations voluntary
	Contact prescribers with recommendations for alternative therapy	Review personnel (usually clinical pharmacist)	Individual educational opportunities	
Computer assistance	Use of information technology to implement previous strategies	Antimicrobial committee to create rules for computer systems	Provides patient-specific data where most likely to impact (point of care)	Significant time and resource investment to implement sophisticated systems
	Expert systems provide patient-specific recommendations at point of care (order entry)	Personnel for approval or review (physicians, pharmacists) Computer programmers	Facilitates other strategies	
Antimicrobial cycling	Scheduled rotation of antimicrobials used in hospital or unit (e.g., intensive care unit)	Antimicrobial committee to create cycling protocol	May reduce resistance by changing selective pressure	Difficult to ensure adherence to cycling protocol
		Personnel to oversee adherence (pharmacist, physicians)		Theoretical concerns about effectiveness

713
 714 Source: MacDougall and Polk, 2005 ⁴⁵
 715

716 Systematic reviews document positive outcomes associated with AMS, including reductions
 717 in unnecessary antimicrobial use.^{44, 46} AMS systems in hospitals have been linked to
 718 significant decreases in antimicrobial consumption and cost, and the benefit is higher in
 719 the critical care setting; infections due to specific antimicrobial-resistant pathogens and
 720 the overall hospital length of stay are improved as well.⁴⁷

721 Given the complex nature of antibiotic use, a combination of different measures, in a
722 multimodal intervention, is likely to be most effective. This was seen in a study in a 938
723 bed hospital in which four interventions were introduced sequentially and evaluated by a
724 mix of quantitative and qualitative methods.⁴⁸ They were, in order: (1) on-request
725 infectious diseases specialist (IDS) consulting service, (2) participation in intensive care
726 unit meetings, (3) IDS intervention triggered by microbiological laboratory meetings, and
727 (4) IDS intervention triggered by pharmacist alert. The number of interventions doubled
728 after implementation of IDS intervention triggered by pharmacist alert. The complete
729 package was associated with a significant decrease of 14.6% in antibiotic use, most marked
730 with fluoroquinolones was observed. However, the different elements were seen to impact
731 to different extents on particular aspects of antimicrobial use in a complementary and
732 cumulative way.

733 In primary care settings, educational interventions have been found to reduce antibiotic
734 prescriptions and inappropriate treatments for urinary tract infection (UTI) without
735 substantially influencing all-cause hospitalisations and mortality. The primary outcome in
736 a Danish randomised controlled trial (RCT) was the number of antibiotic prescriptions for
737 acute UTI per resident per days at risk, defined as the number of days the resident had
738 been present at the nursing home during the trial period.⁴⁹ Furthermore, in the HAPPY
739 AUDIT project in 2008, a multifaceted intervention programme targeting general
740 practitioners (GPs) and patients focused on improving diagnostic procedures in patients
741 with respiratory tract infections (RTIs). After three years, there was still a marked reduction
742 in antibiotic prescribing.⁵⁰ Even longer-term effects of educational interventions have been
743 documented in this project. Antibiotic prescribing for lower RTIs remained low 6 years after
744 an intervention, although GPs were less confident withholding antibiotic therapy in patients
745 with low C-Reactive Protein (CRP) levels.⁵¹

746 **Research, innovation and technological approaches**

747 One of the greatest practical challenges in reducing AMR is to ensure that only patients
748 who need antimicrobials receive them. In some cases, it will be possible to make a clinical
749 diagnosis based on the signs and symptoms. This is common in primary care, where more
750 than 80% of antibiotics are prescribed. However, often it will be necessary to obtain a rapid
751 microbiological diagnosis, for example, to differentiate a viral from a bacterial infection or
752 to ascertain whether the microorganisms involved are sensitive to the antimicrobial being
753 prescribed. The ability to do so has been transformed by the development of a range of
754 point-of-care tests (POCT). Technological advances can also contribute by strengthening
755 surveillance systems, for example by linking data from different laboratories or by
756 environmental sampling, for example, of wastewater. Each of these will be considered in
757 this Opinion.

758 **Cooperation to develop new antimicrobials**

759 The revitalization of the antimicrobials pipeline is essential.⁵² Development and research
760 of new antimicrobials agents needs an evolution of the current mechanisms of financing.
761 Both short-term and long-term solutions to overcome the most urgent limitations in the
762 various sectors of research and funding, aiming to bridge the gap between academic,
763 industrial and political stakeholders, and to unite interdisciplinary expertise in order to
764 efficiently fuel the translational pipeline for the benefit of future generations.⁵³

765 There is a need for de-linkage between R&D on the one hand and Production & Sales on
766 the other hand. Inclusion of trans-sectoral partnerships and public-private cooperation is
767 warranted. In France, the National Council of Industry and the government have signed a
768 'Strategic Contract for the Health Industry and Health Technologies', which describes
769 reciprocal commitments between the government and industry.⁵⁴

770 **1.2.4. A framework for tackling AMR**

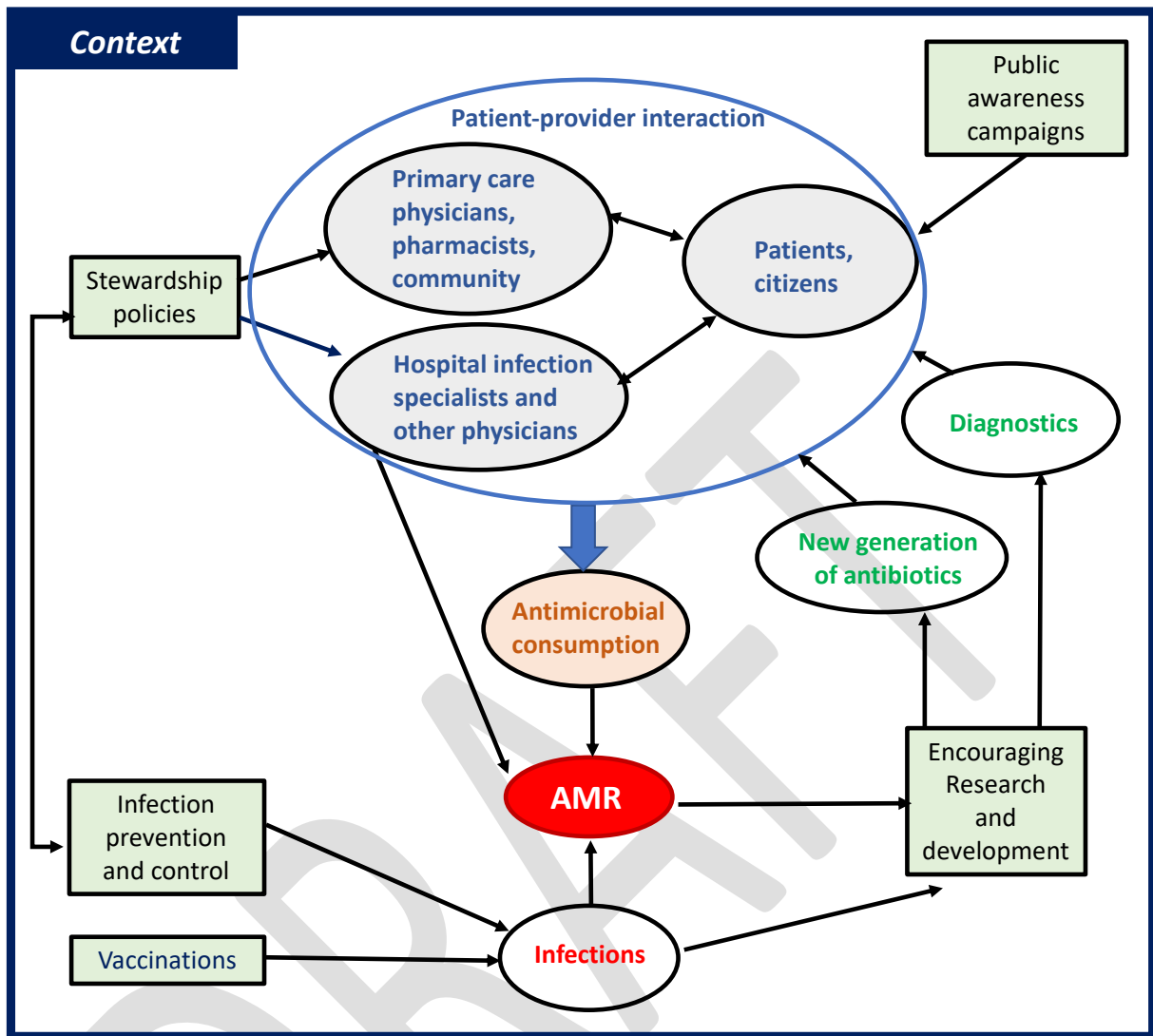
771 **Figure 8** brings together several of the issues described above taking a health system
772 perspective. The levels of infections and antimicrobial consumption are the two key sources

773 of antimicrobial resistance. Infections can be reduced through prevention and control, and
774 through vaccination. Within the health system, antimicrobial consumption is prescribed
775 both within secondary care, where infections are more severe, and within primary care and
776 the community (e.g. by a GP or a pharmacist). Antimicrobial consumption is the outcome
777 of the interaction between the patient and the healthcare provider (e.g. a GP or a hospital
778 specialist). This interaction is influenced by the availability of diagnostic tools and range of
779 available antibiotics (including new generation ones). The patient-provider interaction that
780 ultimately leads to antimicrobial consumption can be influenced by stewardship policies
781 aimed at affecting the behaviour of prescribers, and by public awareness campaigns aimed
782 at affecting patients' attitudes. Policies that stimulate research and development can affect
783 the availability of new antibiotics, which can combat infections more effectively, and the
784 availability of new diagnostic tools that can improve the appropriateness of the prescribed
785 antimicrobials as well as the development of novel antimicrobials treatments and vaccines.
786 At a broader level, it is important to understand the context in which the decisions and
787 actions are made.

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789 Figure 8 Framework for policy interventions at the health system level



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793 1.3. What is the evidence on the determinants of AMR in the health
794 system?

795 The determinants of AMR are multiple. As example, a comprehensive analysis of the
796 determinants of antibiotic prescribing in human medicine has been conducted in Belgium.⁵⁵
797 All primary studies that involved Belgian subjects and were published between January
798 2000 and April 2018, comprising Belgian reports and other grey literature were included.
799 Systematic reviews published between January 2012 and April 2018 and primary studies
800 if they were conducted in countries with similar settings (Western Europe and North
801 America) were also included. The determinants of the choice of the antibiotic molecule
802 have not been included, nor specific clinical factors triggering antibiotic prescription (e.g.
803 auscultatory findings for acute cough). Determinants belong to various categories: factors
804 related to the prescriber (e.g. socio-demographic factors, attitudes and beliefs), to the
805 patient (e.g. knowledge and behaviour), to the health care system (e.g. reimbursement
806 system) and to the overall environmental and cultural scheme.

807 Regarding prescription variation among GPs, one study of prescriptions for sore throat⁵⁶
808 found that prescribing style was an important source of variation in prescription of
809 antibiotics within and across six countries, even after adjusting for patient and GP
810 characteristics.⁵⁶ Variation was documented even among GPs from Sweden and Denmark
811 who, as the authors state, work in an environment with a strong political leadership
812 regarding antibiotic stewardship and have guidelines for the management of sore throat
813 patients. This heterogeneity in the prescribing style and variation within GPs has been
814 attributed to the personal psychological/behavioural attitudes towards uncertainty and risk
815 at the GP-level.

816 The salient beliefs of GPs in Greece towards prescribing have been examined.⁵⁷ GPs
817 acknowledged prescribing as the most important method for treating diseases in primary
818 health care, with significant impact on patient's health and quality of life. The expectations
819 of patients and their families were extremely influential during prescribing, while
820 pharmaceutical sales representatives, other GPs and specialists, as well as public health
821 authorities were included among other factors that have an influence on the GPs
822 prescribing. According to this study, factors such as the income of the patient, the limited
823 time available and special situations such as prescribing through a third person or
824 prescribing following patients' prescription requests for medicines that they have
825 previously purchased over the counter through pharmacies may facilitate or hinder their
826 prescribing decision.⁵⁸ A European collaborative study emphasizes the importance of
827 subjective norms in influencing prescribing behaviour and suggests that irrational
828 prescribing behaviours were more apparent in the countries where an integrated primary
829 care system has still not been fully developed and policies promoting the rational use of
830 medicines are lacking.⁵⁹

831 Non-prescription antibiotic use and inappropriate prescriptions are common in all WHO
832 regions according to a recently published mixed methods systematic review and meta-
833 analysis. The reasons vary among settings.⁶⁰ The authors of this study identified pro-
834 attitudes towards self-medication with antibiotics, relatives having medical backgrounds,
835 older age, living in rural areas, and storing antibiotics at home to be risk factors for self-
836 medication with antibiotics. Self- medication is still one of the most common forms of
837 inappropriate use of antibiotics. Even within the European Union it was possible to dispense
838 antibiotics without a prescription until recently, as in Greece for example.

839 The use of antibiotics without prescription represents also a non-prudent use of antibiotics
840 because of its lack of medical guidance ⁴. A reduction of the use of antimicrobial drugs
841 without prescription appear as an important factor for decreasing AMR.

842 Patient demand for antibiotics can be examined in Andersen's expanded behavioural model
843 of health service use. This is an augmentation of Andersen and Newman's behavioural

⁴ https://ec.europa.eu/health/system/files/2020-06/amr_arna_report_20170717_en_0.pdf

844 model of health service use and categorizes determinants into psychosocial, enabling and
845 needs. The theoretical basis for the psychosocial categories aligns with the Theory of
846 Planned Behaviour, a classical behaviour model that is widely used in the healthcare
847 research. This model might help explain the overuse of healthcare services that may be
848 associated with an increased demand of antibiotics prescribing. Further research is needed
849 to understand to what extent frequent visitors of primary care services have a higher
850 anticipation of antibiotics prescribing. These models, combined with the components of the
851 Health Belief model (perceived susceptibility, perceived severity, perceived benefits,
852 perceived barriers, cues to action, and self-efficacy), may also provide avenues for
853 research into engaging patients as good stewards of antibiotics.⁶¹

854 Although non-prescription use and patient demand are important factors, the general
855 practitioners' perception that the patient wants antibiotics drives prescription behavior.
856 However, when the patient is asked, he often does not necessarily expect an antibiotic.⁶²
857 Therefore, shared decision making processes can reduce antibiotic prescribing in the short-
858 term, as suggested by a 2015 Cochrane Review.⁶³

859 Besides the determinants at individual, physician-patient, and health system levels,
860 national characteristics (e.g., the cultural dimension) and the national environment
861 concerning prescription behavior are also important determinants.

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862 **1.4 What are the innovations and emerging technologies available to**
863 **improve the fight against AMR, how to support their development?**

864 Several interventions targeting the health system have demonstrated their effectiveness
865 in tackling AMR and emerging technologies can now offer additional perspectives.

866 Innovative methods and models are required to empower public and professionals to be
867 proactive rather than reactive in a digitalized world. Progresses in digital health, mobile
868 technologies and multi-omics technologies are changing the paradigm in healthcare and
869 can contribute in the fight against AMR.

870 As described in the previous section, uncertainty about the diagnosis of infection can lead
871 to inappropriate antibiotic prescribing, overuse of resources, and disease complications.⁶⁴
872 Emerging technologies can help to reduce this uncertainty.

873 **1.4.1 Strategies to reduce infections**

874 **Vaccination and alternative approaches**
875

876 Vaccines are used prophylactically, decreasing the number of infectious disease cases, and
877 thus antibiotic use and the emergence and spread of AMR.⁶⁵ *Haemophilus influenzae* type
878 B as well as *Streptococcus pneumoniae* conjugate vaccines have impressive track records
879 in not only preventing life threatening diseases caused by these bacteria, but also reducing
880 antibiotic use and AMR.⁶⁶

881 Different vaccines are also under development with the examples of *Clostridioides difficile*,
882 *Escherichia coli*, *Staphylococcus aureus*, *Neisseria gonorrhoeae*, *Pseudomonas aeruginosa*
883 or *Klebsiella pneumoniae*.

884 Development of next generation vaccines is also part of the strategy against AMR
885 pathogens. This includes reverse vaccinology, enabling the selection of potential vaccine
886 candidates on the basis of the genomic information of a bacterial strain, structural
887 vaccinology, relying on the combination of structural information with immunological and
888 functional characterization of microbial antigens to structurally design new protective and
889 effective vaccine antigens, or generalized modules for membrane antigens which are outer
890 membrane vesicles generated from Gram-negative bacterial strains that have been
891 genetically modified to enhance release of outer membrane vesicles.

892 Beside vaccines, several alternative strategies are evaluated to fight AMR such as the use
893 of therapeutic monoclonal antibodies, microbiota-based interventions, or use of
894 bacteriophages.⁶⁷

895 **1.4.2 Strategies for stewardship and reduction of the use of antimicrobials**

896 **Education of prescribers**
897

898 Common educational methods include one-time seminars and online e-learning modules,
899 but unique strategies such as social media platforms, educational video games and
900 problem-based learning modules have also been employed. Future studies should focus on
901 efficacy of educational interventions including providing education to non-prescribers and
902 disease states beyond upper respiratory tract infections to demonstrate a broader role for
903 education in AMS activities.⁶⁸ Educational interventions appear to be an integral component
904 of other interventions of AMS; however, there is a paucity of evidence to support use as a
905 stand-alone intervention outside of regional public health interventions.⁶⁸

906 A brief digital intervention study in the UK aimed to change patient and public beliefs about
907 antimicrobials and AMR and offers pre-post design evidence in 100 online survey
908 participants.⁶⁹ Participants were presented with a hypothetical situation of cold and flu
909 symptoms, then exposed to the intervention. The online intervention comprised: 1) a

910 profiling tool identifying individual beliefs (antibiotic necessity, concerns, and knowledge)
 911 driving inappropriate antibiotic demand; 2) messages designed to change beliefs and
 912 knowledge (i.e. reduce antibiotic necessity, and increase antibiotic concerns and
 913 knowledge), and 3) an algorithm linking specific messages to specific beliefs and
 914 knowledge. A significant change in beliefs relating to inappropriate demand was observed
 915 after the intervention, with a reduction in beliefs about antibiotic necessity, an increase in
 916 antibiotic concerns, and increases in antibiotic and AMR knowledge.

917 Some educational interventions (i.e., eHealthResp online course for pharmacists and
 918 physicians) have been through a process of content validation, although no effectiveness
 919 data is available.⁷⁰

920 **Innovative reimbursement strategies**

921 Innovative financing models can help to control the prescription rate of antibiotics.

922 Reimbursement strategies for stewardship purpose is an option. For example, a Belgian
 923 study quantified the difference in fluoroquinolone use after a change of the nationwide
 924 criteria for the reimbursement of fluoroquinolones on 1 May 2018. Fluoroquinolone use
 925 dropped significantly immediately after the change in reimbursement criteria, from 2.21
 926 expressed in Defined Daily Dose per 1000 inhabitants per day (DID) (95% CI: 2.03–2.38)
 927 to 0.52 DID (95% CI: 0.48–0.56) and from 9.14% (95% CI: 8.75%–9.56%) to 6.52%
 928 (95% CI: 6.04%–7.04%). The observed decrease in fluoroquinolone use persisted over
 929 time and the change in reimbursement criteria helped to lower fluoroquinolone use in
 930 Belgium.⁷¹

931 In Belgium, an assessment was made in 2019 by the National Institute for Health and
 932 Disability Insurance (NIHDI), comparing antibiotic prescription indicators in fee-for-service
 933 practices without a patient list with the same indicators in capitated practices with
 934 empanelment of patients. **Table 3** shows the results of this comparison and suggests that
 935 capitation and empanelment was associated with lower antibiotic prescription rate than fee
 936 for service.

937
 938 *Table 3 Comparison of antibiotic prescriptions in Belgium: fee-for-service versus*
 939 *capitation (primary care) in 2016*

940

Indicator	Fee-for-service No patient list	Capitation Empanelment
P50: Percentage of patients with one or more antibiotic prescriptions	32%	14%
P50: Percentage of 'second line' antibiotic prescriptions (broad-spectrum) (amoxicillin-clavulanic, cephalosporins, quinolones, macrolides)	53%	32%
P50: Percentage of prescriptions of amoxicillin, not combined with clavulanic acid	53%	72%

941
 942 Source: Leroy et al. 2019⁵⁵

943 Approaches to tackling AMR through reimbursement strategies for incentivising innovation
 944 with for example from France and Germany, outlined in **Table 4**.⁵⁴ France and Germany
 945 implemented interventions centred on providing exceptions in cost-containment
 946 mechanisms to allow higher prices for certain antibacterials. Sweden is piloting a model
 947 that will offer manufacturers of selected antibacterials contracts that would guarantee a
 948 minimum annual revenue.

949
 950 *Table 4 Summary of novel reimbursement mechanisms relevant to AMR in select*
 951 *European countries*

Country	Name	Timeline	Mechanism type	Antimicrobials/ pathogens targeted
France	Exception for antibacterials with ASMR level IV (minor)	In effect since 2015	Medicines with 'moderate' or higher added therapeutic benefit are guaranteed a price not lower than the lowest price across 4 reference countries. This is extended to antibacterials with 'minor' added therapeutic benefit.	Antibacterials assessed as being ASMR level IV (minor)
	Exemptions in clawback scheme	In effect since 2015	Sales of certain medicines exempted from turnover liable to clawback	Antibacterials and other medicines used in combatting AMR
	Price renegotiation for medicines at risk of shortage	In effect since 2015	Companies may request permission for a price increase from the reimbursement authority, if continued commercialisation would otherwise not be viable	This mechanism has been used for antimicrobials, though details are confidential
Germany	Changes in § 35 SGB V	In effect since 2017	<i>Ad hoc</i> exception of antimicrobials from internal price reference groups	Decided by reimbursement authority <i>ad hoc</i> taking into consideration resistance pattern
	Fair Health Insurance Law (Faire Kassenwettbewerbsgesetz)	In effect since March 2020	Automatic exception of 'reserve' antibacterials from internal price reference groups, accelerated reimbursement review process following EMA approval	'Reserve' antibacterials* Reserve group' is to be defined by the Robert Koch Institute and the Federal Institute for Drugs and Medical Devices.

952 *Source: Gotham et al., 2021*⁵⁴

953

954 **Public Awareness Campaigns**

955 Provision of knowledge about the appropriate use of antimicrobials has an intuitive
956 attraction but, from a knowledge translation perspective, there are many reasons for
957 caution. They assume that it is a knowledge deficit that explains why these medicines are
958 used inappropriately when there are, in reality, numerous other factors at play.
959 Nonetheless there is some evidence that they can have a positive impact. A 2012 meta-
960 analysis concluded that mass media campaigns do have a small but statistically significant
961 effect on the general population's attitudes to and knowledge of inappropriate antimicrobial
962 use.⁷² A subsequent review of studies from Italy, the United Kingdom and the United States
963 concluded that mass media campaigns could decrease antibiotic consumption by 6.5%.⁷³
964 Most recently, a study of two decades of experience with the campaigns used by the Belgian
965 Antibiotic Policy Coordination Committee concluded that their mass media campaigns had
966 achieved significant increases in antibiotic awareness.⁷⁴

967 **1.4.3 Strategies for rapid diagnosis based on emerging technologies and**
968 **digital interventions**

969 Since AMR is a huge problem on a global level, it requires innovative methods and models
970 to empower public and professionals to be proactive rather than reactive in a digitalized
971 world. Progress in digital health, mobile technologies and multi-omics technologies are
972 changing the paradigm in healthcare and confer expected benefits in the fight against AMR.

973 As described in the previous section, uncertainty about the diagnosis of infection can lead
974 to inappropriate antibiotic prescribing, overuse of resources, and disease complications.⁶⁴
975 Emerging technologies can clearly help to reduce this uncertainty.

976 **Telemedicine**

977 Telemedicine and telehealth can help to support AMS activities across a range of clinical
978 areas to connect healthcare providers with infectious disease specialists, clinical
979 microbiologists, and/or pharmacists. These activities can occur at the level of pre-
980 authorizations, post-prescription reviews, and/or education. For example, low-cost
981 videoconferencing systems can be employed to conduct individual patient reviews, or
982 virtual AMS ward rounds can be conducted with the remote team. Models for providing
983 AMS via telehealth include regular weekly AMS case conferences and virtual AMS bedside
984 rounds, and prescriptions being reviewed remotely before being dispensed.⁵⁷ A review of
985 the available literature suggests remote AMS programs conducted via telehealth can
986 decrease antimicrobial consumption, especially in small rural or community hospitals.⁷⁵

987 A study conducted in a high-specialized paediatric cardiac hospital evaluated the impact of
988 remote infectious disease consultancy program via telemedicine.⁷⁶ After the
989 implementation of the telemedicine service, the authors showed a trend in the reduction
990 of nosocomial infectious disease rate, with a reduction in the overall antibiotic cost and in
991 the average antibiotics packages used per admission. They also observed a significant
992 reduction in the multi-drug resistant isolation rate.

993 **Electronic clinical decision support systems (eCDDS)**

994 eCDDSs can assist clinicians to make more accurate and timely diagnosis, and aid in the
995 decision to prescribe antimicrobials for a patient. Key infectious diseases bodies support
996 the use of eCDDSs as potentially useful tools in AMS programs, especially for providing
997 access to data that can support quality improvement initiatives. Many studies report cost
998 avoidance or cost minimisation as a result of implementing an eCDDS, although rigorous
999 cost-effectiveness or cost-benefit analyses are lacking. Reported savings include reduction
1000 in antimicrobial expenditure, reduction in length of stay, and reduction in hospitalisation
1001 costs.⁵⁷

1002 eCDDSs that effectively support the AMS clinical team incorporate alerts, prompts and
1003 restrictions, and allow integration with pharmacy and microbiology laboratory systems.

1004 The most common uses of IT systems to provide decision support for AMS include: 1)
1005 Passive decision support through electronic access to guidelines and mobile applications;
1006 2) Electronic antimicrobial approval systems; 3) Electronic infection prevention surveillance
1007 systems; 4) Electronic prescribing (e-prescribing) and electronic medication management;
1008 and 5) Advanced decision support.

1009 **Biomarker-based antibiotic stewardship**

1010 The clinical implications of AMR include treatment failure of antibiotic therapy due to
1011 insufficient efficacy or occurrence of toxicity. Current solutions involve therapeutic drug
1012 monitoring to optimize antibiotic exposure. Biomarker-based strategies have been
1013 proposed as a powerful tool to further quantify and monitor antibiotic treatment response
1014 and reduce variation in treatment response between patients.⁷⁷

1015 Proposed suitable biomarkers include C-reactive protein (CRP; a hepatic acute phase
1016 protein playing a crucial role in the innate host defence by activating the complement
1017 system and promoting phagocytosis of pathogens) and Interleukin-6 (IL-6; a cytokine
1018 produced by immune cells and stromal cells, involved in inflammation, and plays a pivotal
1019 role in orchestrating the immune response to infection). Procalcitonin (PCT) is particularly
1020 promising.⁷⁸

1021 PCT is a precursor to the hormone calcitonin, and, under normal conditions, produced only
1022 intracellularly by parafollicular cells in thyroidal tissues. However, during microbial
1023 infections and severe systemic inflammation, PCT production is induced throughout the
1024 body where it is thought to be associated with immune modulatory properties. PCT-guided
1025 antibiotic treatment termination can lead to a significant reduction of antibiotic exposure
1026 in sepsis and respiratory tract infections. Recent data showed also that PCT was able to
1027 distinguish those COVID-19 patients with secondary bacterial infection.⁷⁹ PCT appears also
1028 as having economical value and cost saving benefits have been reported.⁸⁰

1029 Furthermore, combination of biomarkers is another strategy with potential added value
1030 and accuracy of diagnosis was improved in conditions, like neonatal sepsis for example.⁸¹

1031 **Figure 9** illustrates the use of biomarker informed treatment individualization strategies.

1032
1033

1034 *Figure 9 Overview of the use of biomarker-informed treatment individualization*
 1035 *strategies*

1036

Phase	1 Start of treatment	2 During treatment	3 End of treatment
Action	Select drug and dose	Adjust drug and dose	De-escalation
Tools	Pathogen identification Pharmacokinetic biomarkers Susceptibility testing Pharmacogenomics	Efficacy biomarkers Toxicity biomarkers Therapeutic drug monitoring Pharmacokinetic related biomarkers	Clinical symptoms Efficacy biomarkers Microbial cultures

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Source: Aulin et al. 2021 ⁷⁷

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Current empirical antibiotic treatments are associated with significant risk of toxicity, treatment failure, and antibiotic resistance development. These risks could be reduced by optimizing antibiotic treatments at an individual level. Specifically, treatment individualization strategies informed by biomarkers could play an important part. Such biomarkers can inform on pharmacokinetics, efficacy, and toxicity, and guide the treatment throughout all phases of infection. ⁷⁷

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Point-of-care testing (POCT)

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Point-of-care testing (POCT) is a form of testing in which the analysis is performed where healthcare is provided close to or near the patient. It is one of the top strategies targeted at clinicians to reduce antibiotic prescribing, and it is increasingly being promoted to enhance antibiotic stewardship. The measurement of CRP blood concentrations by POCT enables clinicians to discern bacterial infections from other inflammatory disorders and helps them to identify the patients who benefit the most from antibiotics. The robustness and accuracy of CRP-POCT compared with laboratory testing have been demonstrated by diagnostic studies. CRP-POCT has also been integrated into some clinical guidelines as part of the assessment for respiratory tract infections (RTIs) to reduce diagnostic uncertainty and to aid prescribing decisions. According to a 2020 meta-analysis, CRP-POCT significantly reduced immediate antibiotic prescribing at the index consultation compared with usual care (RR 0.79, 95% CI 0.70-0.90) but not during 28-day ($n=7$) follow-up. The immediate effect was sustained at 12 months ($n=1$). In children, CRP-POCT reduced antibiotic prescribing when CRP (cut-off) guidance was provided ($n=2$). Meta-analyses showed significantly higher rates of re-consultation within 30 days ($n=8$, 1 significant). Clinical recovery, resolution of symptoms, and hospital admissions were not significantly different between CRP-POCT and usual care. CRP-POCT can reduce immediate antibiotic prescribing for RTIs in primary care [number needed to (NNT) for benefit=8] at the expense of increased re-consultations (NNT for harm=27).⁸²

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A number of studies published after the meta-analysis add to the evidence of effectiveness. For instance, one study randomized general practitioners to either antibiotics guided by sequential procalcitonin (PCT) and lung ultrasonography point-of-care tests (UltraPro; $n=152$), PCT-guided antibiotics ($n=195$), or usual care ($n=122$). Compared with usual care, point-of-care PCT led to a 26% absolute reduction in the probability of 28 day antibiotic prescription without affecting patients' safety.⁸³ In a nursing home study, CRP-POCT for suspected lower RTI safely reduced antibiotic prescribing compared with usual care in residents.⁸⁴

1073 Two additional studies highlight the importance of availability of CRP-POCTs. In one study,
1074 GPs were exposed to a multifaceted intervention and given access to a CRP rapid test,
1075 while in the partial intervention group, GPs were only exposed to the multifaceted
1076 intervention. Antibiotic overprescribing was only reduced when CRP rapid test was
1077 available.⁸⁵ These data have been supported by a recently published prospective audit
1078 study that was carried out in 18 countries.⁸⁶ Although a high confidence in decisions about
1079 antibiotic prescribing was reported, there was also considerable variation in GPs antibiotic
1080 prescribing behaviour for RTIs antibiotics and overall there was more prescription than is
1081 considered appropriate. POCTs testing have the potential to enhance the quality of
1082 antibiotic prescribing decisions to the extent to which it is able to safely reverse decisions
1083 confidently made on clinical grounds alone to prescribe antibiotics. Importantly, in Section
1084 2 of this Opinion, the conditions and strategies associated with effective implementation of
1085 POCTs are described.

1086 **Omics technologies to detect antibiotic resistance genes in the environment**

1087 Recent advances in “omics” technologies (genomics, transcriptomics, proteomics, and
1088 metabolomics) are attributed to innovative breakthroughs in genome sequencing,
1089 bioinformatics, and analytic tools such as liquid and gas chromatography and mass
1090 spectrometry, along with high-throughput technologies. Omics technologies have provided
1091 crucial insights into processes related to bacterial physiology, virulence, stress, and the
1092 mechanisms of action of antimicrobial compounds. The use of these tools provides deeper
1093 and more robust data and has greater potential to reveal new therapeutic targets than
1094 conventional assays. These approaches have the potential to provide new insights into our
1095 comprehension of antimicrobial resistance/susceptibility, creating new perspectives for the
1096 struggle against bacteria, and leading to the development of novel products in the future.⁸⁷

1097 **Multi-omics approaches for screening**

1098 Whole-genome sequencing for antibiotic susceptibility testing (WGS-AST) is widely used in
1099 clinical microbiology to predict the AMR phenotype. To release the limitations of the
1100 genomic information and improve the WGS-AST prediction, an integrated multi-omics
1101 approach has been suggested. Preliminary evaluation results show that the integrated
1102 multi-omics approach is able to visually reveal AMR phenotype of the gut microbiota via
1103 antibacterial spectrum, and achieves relatively better performance than the conventional
1104 Whole Genome Sequencing for bacterial antimicrobial susceptibility testing.⁸⁸ Multi-omics
1105 analysis on antimicrobial resistance has also been successfully used to collect extensive
1106 standardized freshwater dataset from hundreds of European lakes, which can be used as
1107 a comprehensive resistome dataset to facilitate and monitor changes in the development
1108 of AMR.⁸⁹

1109 **Metagenomics and network medicine**

1110 Metagenomic next-generation sequencing (mNGS) is a more rapid and agnostic diagnostic
1111 approach for microbiome and resistome investigations. So far, mNGS have proven to detect
1112 multidrug-resistant organisms (MDROs) from rectal swabs in concordance with standard
1113 microbiology results.⁹⁰ Metagenomic techniques, using short-read next-generation
1114 sequencing data, benefit from the ability to quantify thousands of especially transmissible
1115 resistance genes in a single sample. Moreover, it can provide additional information about
1116 the presence of bacterial species, pathogens, and virulence genes and the data can be re-
1117 analyzed if novel genes of interest are identified.

1118 Metagenomic analysis has been used to analyse untreated sewage to characterize the
1119 bacterial resistome from 79 sites in 60 countries.⁹¹ From a surveillance point of view, urban
1120 sewage is attractive because it provides sampling material from a large and mostly healthy
1121 population, which otherwise would not be feasible to monitor.

1122 Clinical metagenomics (CMg) has the potential to be translated from a research tool into
1123 routine service to improve antimicrobial treatment and infection control decisions. CMg
1124 testing provides accurate pathogen detection and antibiotic resistance prediction in a

1125 same-day laboratory workflow, with assembled genomes available the next day for
1126 genomic surveillance. The provision of this technology in a service setting could
1127 fundamentally change the multi-disciplinary team approach to managing intensive care
1128 unit (ICU) infections, improving the initial targeted treatment and rapidly detecting
1129 unsuspected outbreaks of AMR.⁹²

1130 Network medicine is a rapidly growing discipline that considers diseases as the
1131 consequences of perturbed interactions between multiple interconnected biological
1132 components. This powerful integrative approach has enabled a number of important
1133 discoveries in complex disease mechanisms. The combination of multi-omics approaches,
1134 deeply characterizing the clinical phenotype and machine learning through network
1135 medicine offer new perspectives to prevent AMR and for the understanding of complex
1136 health interactions

1137 Drug-repurposing algorithms rank drugs based on one or multiple streams of information,
1138 such as molecular profiles, chemical structures, adverse profiles, molecular docking,
1139 electronic health records, pathway analysis, genome wide association studies, and network
1140 perturbations.⁹³

1141 **1.4.4 Strategies to develop new antimicrobials**

1142 **CRISPR-Cas9 antimicrobials**

1143 The clustered regularly interspaced short palindromic repeats (CRISPR)-associated
1144 (CRISPR-Cas) system, as a bacterial adaptive immune system, is recognized as one of the
1145 new strategies for controlling antibiotic-resistant strains. The programmable Cas nuclease
1146 of this system used against bacterial genomic sequences could be lethal or could help
1147 reduce resistance of bacteria to antibiotics.⁹⁴

1148 CRISPR-Cas9 is an "Ribonucleic acid (RNA)-guided-Deoxyribonucleic acid (DNA) cutter".
1149 Upon bacteriophage infection inside the bacteria, the Cas barcodes small phage genome
1150 sequences into the genome of bacteria to counter-attack using CRISPR-Cas9 to cleave
1151 foreign genetic material. One of the most dynamic and specific key features of this system
1152 is 'sequence-specific targeting', the ability to distinguish between commensal and
1153 pathogenic bacterial species. Guide CRISPR-RNA can be constructed to target only
1154 chromosomal and virulence genes that are highly specific to pathogens, therefore, enabling
1155 this system to be reused against the bacteria rather defending against invaders. For
1156 instance, the newly developed CRISPR/Cas9 "pro-active" genetic system (Pro-AG) could
1157 potentially be used to eliminate of bacterial virulence factors carried on virulence plasmids
1158 and resistance determinants in commensal bacteria. Since Cas9 has nuclease activity, it
1159 can be programmed with a particular target sequence, enhancing the cytotoxicity of
1160 resistant cells. Therefore, a CRISPR-guide RNA can be designed specifically to target
1161 resistance or virulence genes, it will induce a break inside the double-stranded DNA of
1162 resistant bacteria, reverting them into the antibiotic sensitive ones.⁹⁵

1163 However, the utilization of CRISPR-Cas to eliminate AMR genes has only been assessed in
1164 near-clonal bacterial populations and not in a complex microbial community. Using such
1165 an approach in natural environments, where bacteria are typically lodged in a microbial
1166 community, is challenging.

1167 Moreover, despite increasing studies have shown the use of phage-based delivery of
1168 CRISPR-Cas antimicrobials to remove AMR plasmids or kill AMR pathogens, there are still
1169 some limitations in the therapeutic applications of CRISPR-Cas antimicrobials in terms of
1170 this phage-based delivery method. In addition to establish delivery vehicles for CRISPR-
1171 Cas antimicrobials, how to transport them to target intracellular pathogens is another
1172 major challenge.⁹⁶

1173 Although studies have shown the strong potency in bacterial killing using the CRISPR-Cas
1174 antimicrobials, there are still colonies survived by escaping genome targeting. Several
1175 factors mainly contribute to the emerged resistance against CRISPR-Cas antimicrobials in

1176 the escaped colonies, such as the spontaneous mutations in the Cas genes or the target
1177 sequences, spacer excision owing to the homologous recombination between the repeats,
1178 presence of the anti-CRISPR Acrosin (Acr) genes in the target host genomes, and repressed
1179 expression/activity of Cas proteins.⁹⁶

1180 **Machine learning**

1181 The recent advances made in data science, artificial intelligence (AI) and machine learning
1182 algorithms offer novel opportunities for the surveillance of antibiotic resistomes, as well as
1183 experimental formulation of combinatorial drugs.

1184 Machine learning might help also to distribute more efficiently tasks and actions to tackle
1185 AMR across the health systems, and contribute in several ways.

1186 The following are some potential applications of machine learning in fight against AMR:

1187 a) To decelerate the spread of antibiotic resistant genes, surveillance of the resistome
1188 is of utmost importance. The integrative applications of whole-genome sequencing
1189 and metagenomics together with machine learning models serve as means for
1190 state-of-the-art surveillance of the antibiotic resistome.⁹⁷

1191 b) AI can be used for monitoring and quick alert. It can be applied to generate
1192 standardized data that can be compared between nations, track the emergence and
1193 spread of AMR genes and assist in the allocation of required resources.

1194 c) Given the recent advances in AI, these and other models will likely add to the future
1195 identification of new antibiotics. The general power of neural networks for detecting
1196 new antimicrobial candidates has already been demonstrated.⁹⁸ By using a
1197 computational model that screens hundreds of millions of chemical compounds in a
1198 few days, potential antibiotics could be proposed rapidly.

1199 d) Inclusion in the process of antibacterial drug discovery and development.

1200 e) More efficient distribution of tasks and actions to tackle AMR across the health
1201 systems. Tasks can be shifted from health workers to patients and their care givers,
1202 to machines, and to other health workers. Where these shifts have been evaluated,
1203 they often, but not always, are associated with outcomes that are as good or even
1204 better than with the status quo.⁹⁹

1205 **Table 5** provides a summary of the innovations and new technologies being developed
1206 and deployed to tackle AMR, along with an assessment of associated opportunities and
1207 challenges, and effectiveness and cost-effectiveness data when available.

1209

1210 *Table 5 Innovations and new technologies being developed and deployed to tackle AMR*

Innovations and New Technologies	Opportunities	Challenges	Effectiveness	Cost-effectiveness
Strategies to reduce infections				
Vaccine and alternative approaches	Treatment, prevention and control	Broader adoption by the community	Reduction of infections and AMR	Savings on healthcare expenses
Strategies to reduce use of antimicrobials				
Education of prescribers	Optimise antimicrobial use	Multidisciplinarity and coordination	Reductions in unnecessary antimicrobial consumption	Reduction in costs
Innovative reimbursement strategies	Control of antimicrobial prescription			Savings on antimicrobials expenditures
Public awareness campaigns	Effective implementation of critical interventions	Integral component of other AMS interventions	Scarce evidence as a stand-alone intervention	Lower cost compared to non-digital
Strategies for rapid diagnosis based on emerging technologies and digital interventions				
Telemedicine	Support AMS activities	Deployment	Decrease antimicrobial consumption in small rural or community hospitals	Low-cost videoconferencing and education programs
Electronic clinical decision support systems	Provide access to data that support quality improvement	Important to incorporate alerts, prompts and restrictions, and allow integration with pharmacy and microbiology laboratory systems	Support AMS	Savings on antimicrobial related expenditures
Biomarkers based antibiotic stewardship	Optimize antibiotic treatments at an individual level Reduction of diagnostic uncertainty	Need to integrate multiple datasets	Reduction of treatment toxicity, treatment failure and AMR	Reduction in costs and improved clinical outcomes
Point-of-care testing	Discern bacterial infections from other inflammatory disorders Rapid diagnosis Reduce clinical uncertainty	Setting legal framework in primary care Cost / reimbursement	Reduction in antibiotic prescribing	Expected higher cost than central clinical laboratories but more targeted test prescription and sustainable approach
Omics technologies to detect antibiotic resistance genes in the environment	Potential to reveal new therapeutic targets Improved surveillance	Complexity, and wide dynamic range of the samples	Improved prevention, surveillance and control	High operating costs
Multi-omics approaches for screening	Predict AMR phenotype	Data management and integration	Better performance than the conventional Whole Genome Sequencing	High operating costs and need of bioinformatic support
Metagenomics / mNGS and network medicine	Improve the initial targeted treatment; AMS	Labor-intensive, highly skilled	mNGS have proven to detect MDRO from rectal swabs in concordance with	Expensive

Managing antimicrobial resistance across the health system

Innovations and New Technologies	Opportunities	Challenges	Effectiveness	Cost-effectiveness
			standard microbiology results	
Strategies to develop new antimicrobials				
CRISPR-Cas9 antimicrobials	CRISPR-Cas9 can be designed specifically to target AMR	Need to establish delivery vehicles for CRISPR-Cas antimicrobials; how to transport them to target intracellular pathogens; how can the emergence of resistance to CRISPR-Cas be avoided	Use of phage-based delivery of CRISPR-Cas antimicrobials to remove AMR plasmids or kill AMR pathogens	Investment for more research, developments and translation to practices
Machine Learning	Support to clinical decision Surveillance of AMR Identification of novel treatments	Need of structured and interoperable data Security and safety of data exchanges Human warrantee	Identification of new drugs Monitoring of AMR	Improved efficiency and maximize human resources Sustainable

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1212 **2 Policy analysis**

1213 **2.1 A One Health Approach to tackling AMR**

1214 In May 2014, the World Health Assembly issued resolution WHA67.25 to develop a global
1215 action plan (WHO GAP) on antimicrobial resistance. The plan was developed by the World
1216 Health Organization in collaboration with the Food and Agriculture Organization of the
1217 United Nations (FAO) and the World Organisation for Animal Health (OIE). These three
1218 organizations are referred to as “the Tripartite” and have since been joined by the United
1219 Nations Environment Programme (UNEP) to form the Quadripartite. The Quadripartite
1220 coordinates global activities to address health risks at the animal-human-ecosystems,
1221 promoting the One Health Approach as the guiding frame for national responses to AMR.

1222 The WHO GAP was endorsed in May 2015 and identifies five strategic objectives:

- 1223 a) to improve awareness and understanding of AMR through effective communication,
1224 education and training;
- 1225 b) to strengthen knowledge through surveillance and research;
- 1226 c) to reduce the incidence of infection through effective sanitation, hygiene and
1227 infection prevention measures;
- 1228 d) to optimize the use of antimicrobial agents in human and animal health; and
- 1229 e) to develop the economic case for sustainable investment that takes account of the
1230 needs of all countries, and increase investment in new medicines, diagnostic tools,
1231 vaccines and other interventions.¹⁰⁰

1232 For each objective, it detailed specific actions for Member States, its Secretariat, and
1233 international and national partners. Countries agreed to develop national action plans on
1234 AMR that are consistent with the WHO GAP and to implement relevant policies and plans
1235 to prevent, control and monitor AMR. In brief, actions to address awareness include
1236 communication programmes, AMR as a core component of professional education, training,
1237 and certification, and inclusion of antimicrobial use and resistance in school curricula.
1238 Actions to address surveillance include developing a national surveillance system for AMR
1239 that includes a national reference centre able to systematically collect, analyse, and report
1240 data and at least one reference laboratory capable of susceptibility testing using
1241 standardized tests and operating under agreed quality standards to fulfil the core data
1242 requirements. In the area of infection prevention and control, recommendations include
1243 training and education in hygiene and infection prevention and control component of
1244 professional education, training, and certification, developing/strengthening policies and
1245 standards while monitoring implementation and adherence, and incorporation of collecting
1246 and reporting of data on antimicrobial susceptibility of microorganisms causing health care-
1247 associated infections. With respect to optimization of antimicrobial use, actions include
1248 developing/implementing enforceable regulatory frameworks for marketing, distribution,
1249 prescriptions, dispensing, and reimbursements, as well as provision of stewardship
1250 programs and modification of economic incentives to encourage appropriate use of
1251 antimicrobial agents. Lastly, with respect to the economic case, actions include assessing
1252 and financing national action plans and participating in research to support the
1253 development of new medicines, diagnostic tools, and vaccines.

1254 In 2016, the organizations launched the first Tripartite Annual Country Self-Assessment
1255 Survey (TrACSS).¹⁰¹ National authorities conduct a self-assessment of actions in relevant
1256 sectors, identifying progress under a series of topics. Each country is asked to submit one
1257 combined official response, validated by all sectors involved, which summarises national
1258 progress. The responses are structured according to the first four WHO GAP objectives.
1259 Most questions ask for a rating of national capacity and progress on a five-point scale (A
1260 to E) which encompass both progress and functionality. They indicate whether policies and
1261 plans are in place and how far activities are being implemented. Several questions refer to
1262 tools or guidance developed by FAO, OIE or WHO that can help build country capacity in

1263 addressing particular areas. The survey is now conducted annually and the resulting data
1264 have contributed to the development of a Strategic Framework that addresses identified
1265 areas of need and, at the same time, incorporates new questions as guidance evolves.

1266 The Strategic Framework, published in April 2022,¹⁰² documents the goal and two
1267 supporting objectives, along with overall impact, longer-term outcomes focusing on
1268 countries, and two intermediate outcomes and related functions/outputs at 1) country level
1269 and 2) global/regional levels.

1270 The overall goal of the Strategic Framework is to preserve antimicrobial efficacy and ensure
1271 sustainable and equitable access to antimicrobials for responsible and prudent use in
1272 human, animal, and plant health, contributing to achieving the Sustainable Development
1273 Goals (SDGs). The two objectives are:

1274 f) to optimize the production and use of antimicrobials along the whole life cycle from
1275 research and development to disposal;

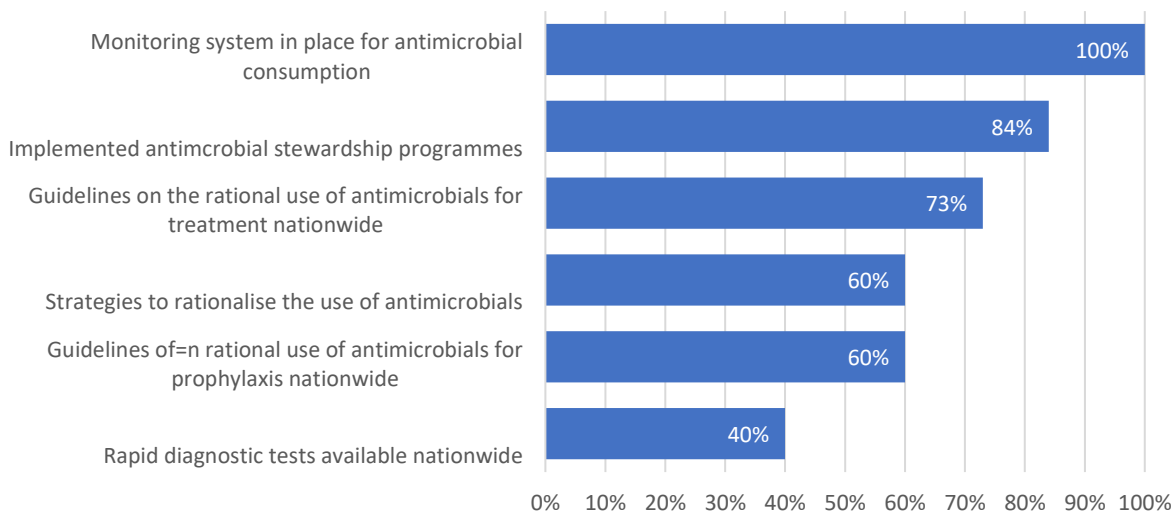
1276 g) to decrease the incidence of infection in humans, animals, and plants to reduce the
1277 development and spread of AMR.

1278 The annual TrACSS surveys reveal considerable differences in the progress made by
1279 countries, and in their capacity, resources and context. For instance, although most
1280 countries surveyed have developed a national action plan, few have the necessary
1281 approved and budgeted operational plan to implement it. This reflects lack of capacity to
1282 coordinate, monitor, and adapt responses to AMR. Less than half of the countries surveyed
1283 have nationwide implementation of infection prevention and control in human health
1284 facilities aligned with WHO guidelines. Multi-sectoral working groups, which are critical to
1285 a successful One Health approach to tackling AMR, are functional in only half of countries
1286 surveyed and only a third balance representation across human, animal, and plant health
1287 and the environment.

1288 Specific to health systems, in an examination of 29 OECD countries, the numbers
1289 implementing policies to promote the rational use of antimicrobials vary by policy (**Figure**
1290 **10**). While all 29 reported a monitoring system in place for antimicrobial consumption, only
1291 40% reported rapid diagnostic tests available nationwide.¹⁶

1292
1293

1294 *Figure 10 Proportion of OECD countries implementing specific policies to promote the*
 1295 *rational use of antimicrobials*



1296
1297

1298 **2.2 AMR Policy in the European Union**

1299 In 2016 the Council issued a series of conclusions on “next steps under a One Health
 1300 approach to combat antimicrobial resistance”. It called upon member states to develop
 1301 national action plans based on the One Health approach and in line with the WHO GAP
 1302 objectives, on the member states and the Commission to work together to develop an
 1303 Action Plan, and the Commission to take a series of measures to support these
 1304 developments.¹⁰³ The Action Plan was published the following year.¹ The Plan sets out a
 1305 series of high level objectives, backed up by a list of actions to be taken by the Commission.

1306 The key objectives of the plan are built on three main pillars:

- 1307 a) Making the EU a best practice region. As the evaluation of the 2011 action plan
 1308 highlighted, this will require better evidence, better coordination and surveillance,
 1309 and better control measures. EU action will focus on key areas and help Member
 1310 States in establishing, implementing and monitoring their own national One Health
 1311 action plans on AMR, which they agreed to develop at the 2015 World Health
 1312 Assembly;
- 1313 b) Boosting research, development and innovation by closing current knowledge gaps,
 1314 providing novel solutions and tools to prevent and treat infectious diseases, and
 1315 improving diagnosis in order to control the spread of AMR;
- 1316 c) Intensifying EU efforts worldwide to shape the global agenda on AMR and the related
 1317 risks in an increasingly interconnected world.

1318 While the Action Plan is written for the Commission, most of the commitments it contains
 1319 are equally relevant for member states (**Table 6**).

1320 *Table 6 Recommendations from the EU One Health Action Plan*

1321

Goal	Commission action
Strengthen One Health surveillance and reporting of AMR and antimicrobial use	Review EU implementing legislation on monitoring AMR in zoonotic and commensal bacteria in farm animals and food, to take into account new scientific developments and data collection needs.
	Review EU implementing legislation on reporting communicable diseases in humans to take into account new scientific developments and data collection needs.

Managing antimicrobial resistance across the health system

	Identify and assess under the Animal Health Law and with the support of the EFSA, resistant bacteria that cause transmissible animal diseases and, if necessary, develop harmonised rules for their surveillance.
	Improve AMR detection in the human health sector by providing EU support for networking collaboration and reference laboratory activities.
	Consider options for the harmonised monitoring of AMR in the environment, including through the network of national reference laboratories in the veterinary sector.
Benefit from the best evidence-based analysis and data	Provide evidence-based data, with the support of the ECDC, the EMA and the EFSA, on possible links between the consumption of antimicrobial agents and the occurrence of antimicrobial resistance in humans and food-producing animals.
	Define, with the support of the ECDC, the EMA and the EFSA, a limited number of key outcome indicators for AMR and antimicrobial consumption to measure the EU's and Member States' progress in the fight against AMR.
	Develop, with the support of the OECD, a model aimed at helping Member States to assess the economic burden of AMR imposes on people and to estimate the cost-effectiveness of their national policies to reduce it.
Increase awareness and understanding	Provide insights into reported public use of and knowledge about antimicrobials through Eurobarometer surveys.
	Support Member States' national awareness-raising efforts with specific communication tools targeting key audiences and contribute to the annual European Antibiotic Awareness Day (EAAD).
Improve the coordination of Member States' One Health responses to AMR	Make available regular information on AMR in the context of the AMR One Health network, which gives an overview of the AMR epidemiological situation at Member State and EU level.
	Support the implementation of national One Health action plans against AMR through joint Commission and the ECDC visits to Member States upon request.
	Launch a joint action to support collaborative activities and policy development by Member States to tackle AMR and healthcare-associated infections.
	Make increased use of the EU Health Security Committee and the Commission Working Group on AMR in the veterinary and food areas to strengthen coordination and to share information.
	seek to co-fund and collaborate with the WHO on activities to help EU Member States develop and implement national One Health action plans against AMR.
Better implementation of EU rules	Assess the effectiveness of the implementation of EU legislation on, inter alia, monitoring AMR in food-producing animal populations and food by continuing to carry out regular audits in Member States.
	Develop training programmes on AMR for Member State competent authorities under the Better Training for Safer Food (BTSF) initiative and for health professionals through the ECDC and the EU health programme.
Strengthen infection prevention and control measures	Help to address patient safety in hospital environments by supporting good practices in infection prevention and control.
	Support activities jointly funded by the EU and Member States for infection prevention and control in vulnerable groups, in particular to tackle resistant tuberculosis strains.

	Promote the uptake of vaccination in humans as a public health measure to prevent infections and subsequent use of antimicrobials.
	Continue to promote animal husbandry, including aquaculture and livestock farming systems, and feeding regimes, which support good animal health and welfare to reduce antimicrobial consumption.
Promote the prudent use of antimicrobials	Work towards EU implementing and delegated acts under the forthcoming veterinary medicinal products and medicated feed Regulations (once adopted by the European Parliament and the Council), including rules on reserving antimicrobials for human use, drawing up a list of antimicrobials that cannot be used off-label, and methods for data gathering and reporting on the sales and use of antimicrobials.
	Develop EU guidelines for the prudent use of antimicrobials in human medicine.
	Assist Member States implement EU guidelines for the prudent use of antimicrobials in veterinary medicine, including identifying and disseminating good practices.
	Encourage the EMA to review all available information on the benefits and risks of older antimicrobial agents and consider whether any changes to their approved uses in the Member States are required.

1322
 1323 The Action Plan concludes by proposing the development of a limited number of key
 1324 outcome indicators, based on data already collected, to be developed with the support of
 1325 the EU scientific agencies. They are intended to enable member states to assess, in a clear
 1326 and simple way, progress made in the implementation of their national One Health action
 1327 plans on AMR. The indicators are also expected to help Member States to set measurable
 1328 goals to reduce infections by key antimicrobial resistant microorganisms in humans and
 1329 food-producing animals, to improve the appropriateness of the use of antimicrobials in the
 1330 human and veterinary sectors and to combat AMR in all sectors.

1331 Progress will be discussed at regular intervals in the One Health network on AMR, with
 1332 assessments being used to guide individual Member States and to determine if new actions
 1333 are needed at EU level.

1334

1335 **2.3 National AMR Policies in Europe**

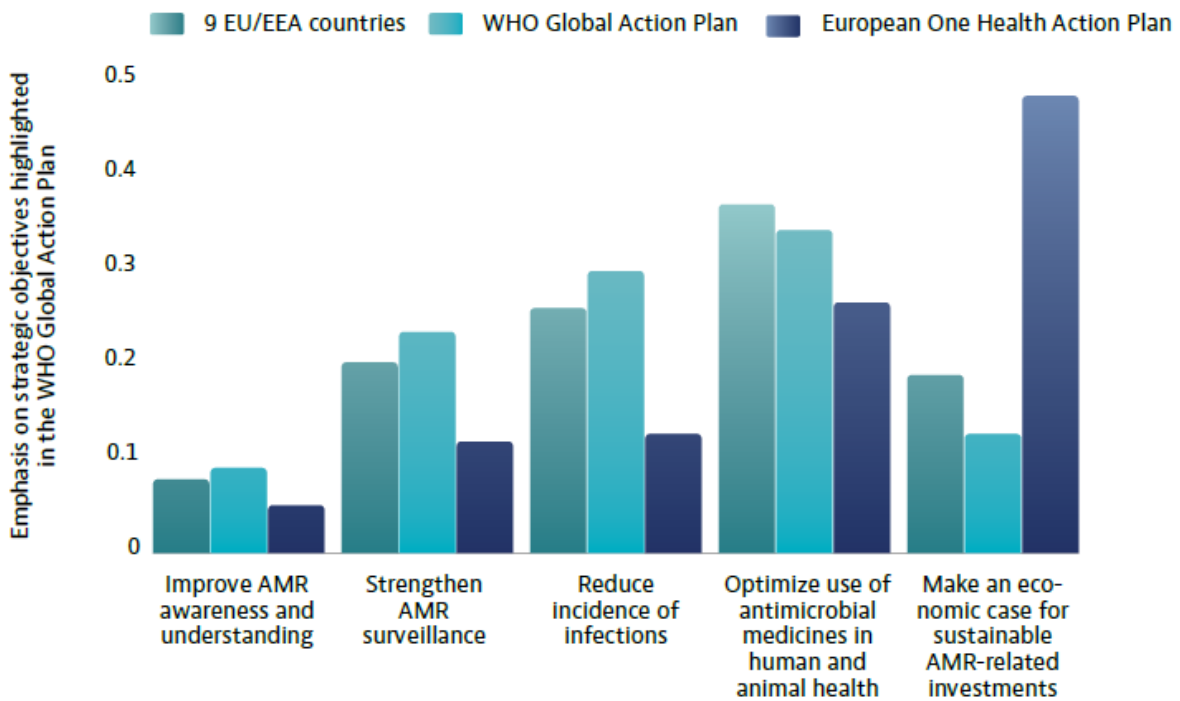
1336 In 2018, a study by the European Public Health Alliance (EPHA) confirms the diversity in
 1337 content and implementation of national action plans across 31 European nations. Only half
 1338 used a One Health approach. Setting measurable targets, integrating monitoring and
 1339 evaluation methods, and identifying funding sources were identified as important,
 1340 according to the report, to ensure that estimated financial resources have supported
 1341 national action plan implementation.¹⁰⁴

1342 In TrACSS findings, as of May 2021, Member States report that 25 out of 29 EU/EEA
 1343 countries had developed an action plan to tackle AMR. Progress on plan development and
 1344 implementation are as follows:

- 1345 • No national AMR Action Plan: Poland
- 1346 • National AMR Action Plan is under development: Bulgaria, Estonia, Lithuania
- 1347 • National AMR Action Plan developed: Belgium, Czech Republic, Slovenia, Hungary,
 1348 Greece, Portugal, Romania, Cyprus
- 1349 • National AMR Action Plan being implemented: Finland, Ireland, Croatia, Austria,
 1350 Germany, Denmark, Netherlands, Latvia, Sweden
- 1351 • National AMR action plan being implemented and actively monitored through a
 1352 monitoring and evaluation framework: Slovakia, France, Italy.

1353
 1354 An OECD analysis of action plans from nine EU/EEA countries (based on their TrACSS 2020-
 1355 2021 report) reveals that, consistent with the WHO-GAP, national action plans emphasise
 1356 policies to optimise antibiotic use in human and animal health the most, followed by policies
 1357 to strengthen AMR surveillance, and Infection Prevention and Control (IPC) measures.⁵
 1358 These findings are displayed in **Figure 11**.

1359 *Figure 11 Comparing the content of 9 national action plans in EU/EEA countries, the*
 1360 *European One Health Action Plan and the WHO Global Action Plan*



1362
 1363 *Source: OECD Briefing Note from March 2022*⁶

1364
 1365 In May 2022, the European Commission’s AMR One Health Network held a Subgroup
 1366 meeting focused specifically on reviewing the content of National AMR Action Plans of the
 1367 EU-27 with respect to One Health. Their review⁷ reports that:

- 1368 • 26 of the EU-27 countries have a One Health National AMR Action Plan.
 - 1369 ○ 12 countries have valid and approved plans.
 - 1370 ○ 10 countries have plans that lapse in 2022.
 - 1371 ○ Cyprus has a plan approved prior to the adoption of WHO GAP Objectives.
 - 1372 ○ 4 do not have valid and approved plans:
 - 1373 ▪ Hungary has a two-sectoral plan
 - 1374 ▪ Estonia and Romania have a one-sector plan
 - 1375 ▪ Poland does not have a National One Health AMR Plan

⁵ <https://www.oecd.org/health/Antimicrobial-Resistance-in-the-EU-EEA-A-One-Health-Response-March-2022.pdf>

⁶ <https://www.oecd.org/health/Antimicrobial-Resistance-in-the-EU-EEA-A-One-Health-Response-March-2022.pdf>

⁷ https://ec.europa.eu/health/events/amr-one-health-network-subgroup-meeting-national-action-plans-naps-2022-05-31_en

1377 Even prior to the TrACCS, since 2006, ECDC conducted national country visits to discuss
1378 AMR when invited by national authorities in EU/EEA countries. Between 2006 and 2019,
1379 AMR country visits were made to 27 EU Member States and one EEA country. These visits
1380 offer an opportunity to provide a comprehensive assessment of what is being done to
1381 combat AMR and highlight areas where additional work would be beneficial.¹⁰⁵

1382
1383 In 2016, the scope of these visits was expanded from their earlier focus on human health
1384 to become joint 'One-Health' visits, with the inclusion of veterinary and environmental
1385 experts, working in collaboration with the European Commission.¹⁰⁵ The assessment
1386 instrument used in the 2020 version includes a series of indicators in the following
1387 domains: inter-sectoral coordination mechanisms, national action plans, organised
1388 multidisciplinary collaboration at local level, clinical diagnostic and reference laboratory
1389 services, monitoring of AMR, monitoring of antimicrobial consumption, antimicrobial
1390 stewardship and treatment guidelines, IPC, AMR and IPC education, public information and
1391 behavioural change interventions for AMR ("One-Health" - all sectors), and marketing
1392 issues.¹⁰⁶

1393
1394 The resulting reports provide specific recommendations for the country visited,¹⁰⁷ providing
1395 an opportunity for shared learning about strengths and weaknesses of different approaches
1396 and the ways that are most likely to succeed when implementing national action plans.
1397 Highlights from some of the most recent visits are summarized in the following paragraphs.

1398
1399 **Ireland's** commitment to the management of AMR, in all sectors, was seen, in October
1400 2019, as a good model for other countries to follow. It had a comprehensive inter-sectoral
1401 NAP on AMR covering the years 2017-2020, with clearly defined strategic objectives and
1402 related actions, timetables, and responsibilities, albeit it lacked quantitative targets or
1403 other indicators to measure the plan's success. A 2017 Carbapenemase-producing
1404 Enterobacteriaceae (CPE) outbreak and subsequent declaration of a National Public Health
1405 Emergency on CPE raised awareness and put AMR on the agenda of all the key actors. On
1406 the other hand, the importance of maintaining control of other pathogens with AMR was
1407 emphasised, as was the prevention of HAIs in general and the long-term sustainability of
1408 the CPE control measures that had been implemented.

1409 A March 2019 visit assessed that **Estonia** had yet to develop a One Health approach to
1410 AMR. The report noted that "the relatively limited size of the problem of AMR has led to
1411 underestimating the potential consequences that AMR could have in the future, and
1412 possibly to deprioritising the necessary measures to safeguard the healthcare system from
1413 AMR".

1414 A visit to **Malta** in November 2018 found little progress since a previous one in 2007.
1415 Concern was voiced about low levels of public understanding of the indications for antibiotic
1416 use, associated with high levels of demand for antibiotics by patients. Concerns were also
1417 raised about the influence of the pharmaceutical industry on doctors' prescribing,
1418 associated with high levels of broad-spectrum antibiotics in particular. Other concerns
1419 arose in relation to the governance of hospitals.

1420 A visit to **Romania** in June 2018 raised considerable concerns, including the importance
1421 of preparing a National Action Plan for AMR that would take a 'One Health' approach, a
1422 series of recommendations on aspects of diagnosis, surveillance, prevention, and control
1423 of multidrug-resistant organisms, and the need for an inter-sectoral coordination
1424 mechanism, are among the key recommendations.

1425 A visit to **Spain** in January 2018 expressed concern that "the high levels of CPE and AMR
1426 observed were sometimes accepted, as if they were unavoidable and health professionals
1427 felt that they had done everything they could - or everything within their remit and the
1428 limit of their resources - to control the spread of CPE". Spain was one of a number of
1429 countries where responsibility for health policy is decentralized, so that plans are

1430 implemented, and in some cases developed by, regional governments. An example from
1431 Catalonia is described in Box 1.

1432

1433 *Box 1 Regional AMR Plan – Catalonia*

1434 Within the framework of the patient safety strategy, and in accordance with the Spanish
1435 National Antibiotic Resistance Plan, the Catalan Department of Health established “PROA
1436 Cat”. “PROA Cat” is a global, cross-cutting, and integrative approach that aims to reduce
1437 AMR by optimizing the prescription and use of antimicrobials, and favoring coordination
1438 between the different agents involved in the use of antibiotics in all healthcare settings in
1439 Catalonia.

1440 PROA Cat has three main pillars: monitoring of antibiotic sensitivity, monitoring antibiotic
1441 consumption, and tailored interventions. Monitoring of antibiotic sensitivity is done locally,
1442 with the collaboration of all Catalan laboratories. Catalonia started monitoring of antibiotic
1443 sensitivity at primary care centers (adults and children) and for adult hospitalizations in
1444 2020, and for child hospitalizations in 2021. In 2022, monitoring of antibiotic sensitivity at
1445 long-term care centers will commence. The data is returned to all professionals in the
1446 region. Tables and maps of aggregate data are provided. Tailored interventions are
1447 designed in order to adapt empirical treatments and antimicrobial therapeutic guideline
1448 recommendations to the local sensitivity values.

1449

1450 In addition, the consumption of antimicrobials in the adult and paediatric population is
1451 monitored. A standard surveillance system is place, which includes an AMR registry, the
1452 deployment of interventions, and monitoring of indicators in the different healthcare
1453 settings. In parallel with the tailored interventions, antimicrobials use is protocolled to treat
1454 the most prevalent infections, promoting the use of diagnostic tools. Two educational
1455 programs are in place: one targets community pharmacies and another targets the public
1456 on the benefit of medicines and the adequate use of antibiotics.

1457 Source: PROA Cat 2019-2025¹⁰⁸

1458

1459 A visit to **Belgium** in November 2017 called for an increase in the sense of urgency to
1460 bring about change among prescribers and the general public, with the visitors pointing to
1461 a need for strong leadership and guidance.

1462 The visit to **Italy** in January 2017 led to expressions of concern, as in Spain, that high
1463 levels of AMR are often accepted as unavoidable by many groups within the healthcare
1464 system. As in Belgium, the visitors urged a greater sense of urgency about the AMR
1465 situation at all levels and among all stakeholders in the country. They also emphasized the
1466 need for clear definitions of the responsibilities of those concerned, coupled with central
1467 coordination, supervision, and auditing of progress in the regions, and particularly those
1468 where the burden of AMR is greatest. Italy has developed a performance evaluation
1469 system, illustrated as a good practice in Appendix A.

1470

1471 **2.4 Evidence regarding the effectiveness of existing AMR policies to tackle AMR**

1472 It is challenging to ascertain the effectiveness, or cost-effectiveness, of policies to tackle
1473 AMR because (1) it is difficult to untangle the relative impact of the different types of
1474 activities that are combined with a given national action plan, (2) the impact of a specific
1475 activity depends on its implementation, and (3) the mechanisms through which a given
1476 activity leads to downstream impact are not fully clear. Despite these challenges, a 2019
1477 Policy Brief on Averting the AMR Crisis¹¹⁰ synthesizes existing evidence for the key activities
1478 related to each of the 5 strategic WHO GAP objectives. The following conclusions can be
1479 drawn from an attempt to summarize and extend the findings described in Section 1 by
1480 WHO GAP Objective and identify areas for improvement.

1481 **WHO GAP Objective 1: To improve awareness and understanding of AMR through**
1482 **effective communication, education and training.** Although several countries

1483 experience a reduction in the number of antibiotic prescriptions following AMR awareness
1484 campaigns, the most effective public health messages and interventions are not clear.
1485 Training for professionals from health, animal, food and environmental sectors on AMR,
1486 AMS, and IPC is important. Guidance from the WHO in the form of a dedicated Competency
1487 Framework for Health Workers' Education and Training on Antimicrobial Resistance is
1488 available that outlines knowledge, skills, and attitudes for different groups.¹¹¹ Despite this,
1489 training varies in quality and coverage within and across countries.

1490 **WHO GAP Objective 2: To strengthen knowledge through surveillance and**
1491 **research.** Surveillance data will inform the development of the national action plan and
1492 offer feedback on implementation effectiveness once established. Such systems ideally
1493 span human, animal, plant, and environmental health. National systems should link into
1494 international ones, which require certain standards. This means ensuring adequate
1495 laboratories, equipment and technical expertise, along with regular external quality
1496 assessment. Both structures and processes must be in place for successful data collection.

1497 **WHO GAP Objective 3: To reduce the incidence of infection through effective**
1498 **sanitation, hygiene and infection prevention measures.** Infection Prevention and
1499 Control measures can be horizontal (applied generally across a whole institution) or vertical
1500 (address specific problems, such as a type of infection). However, it is not clear which
1501 strategy is more effective. OECD modelling suggests that improved hand hygiene would
1502 represent a particularly good investment, with an average annual implementation cost of
1503 USD PPP⁸ 8500 per 100 000 persons and a net return of approximately USD PPP 140 000.¹⁶

1504 **WHO GAP Objective 4: To optimize the use of antimicrobial agents in human and**
1505 **animal health.** In primary care, effective interventions to change the prescribing
1506 behaviour of clinicians use guidelines, outreach visits, clinical audit, and/or computerized
1507 reminders. Financial incentives have demonstrated effectiveness. Shared decision-making
1508 is highly effective. Rapid, affordable and easy-to-use diagnostic tools, including point-of-
1509 care tests, can be effective but are not widely available. Cost-effectiveness evidence is
1510 lacking. A Cochrane review of hospital AMS programs has shown that those involving
1511 enablement (e.g., the use of audit and feedback) and/or restrictive techniques (e.g., the
1512 use of rules and guidelines) are most effective.⁴⁶ However, better quality cost-effectiveness
1513 evidence is needed.

1514 **WHO GAP Objective 5: To develop the economic case for sustainable investment**
1515 **that takes account of the needs of all countries, and increase investment in new**
1516 **medicines, diagnostic tools, vaccines and other interventions.** OECD modelling
1517 suggests that effective implementation of AMS programmes could result in a 51% reduction
1518 of deaths from AMR and €2.3 billion saved.¹¹² The OECD Strategic Public Health Planning
1519 for AMR (SPHeP-AMR) model will compare health and economic impact of a number of AMR
1520 control policies relative to a business-as-usual scenario without interventions.

1521 **2.5 Effective implementation of national action plans**

1522 To assist nations in developing new and improving existing national action plans, the WHO
1523 created a guidebook to assist nations in developing new and improving existing NAPs.
1524 Other resources for nations include sample terms of reference for suggested coordination
1525 mechanisms, a generic template for a national action plan, a sample monitoring and
1526 evaluation plan, and a checklist produced by WHO in partnership with FAO and OIE to
1527 accompany this manual.¹¹³

1528 Yet, according to the Interagency Coordination Group (JACG) on Antimicrobial Resistance's
1529 2018 report, the greatest challenge in most countries is not writing or developing the
1530 national action plan, but implementing it in a sustainable manner. Barriers include lack of
1531 awareness and political will, finance, coordination, monitoring and data, and technical

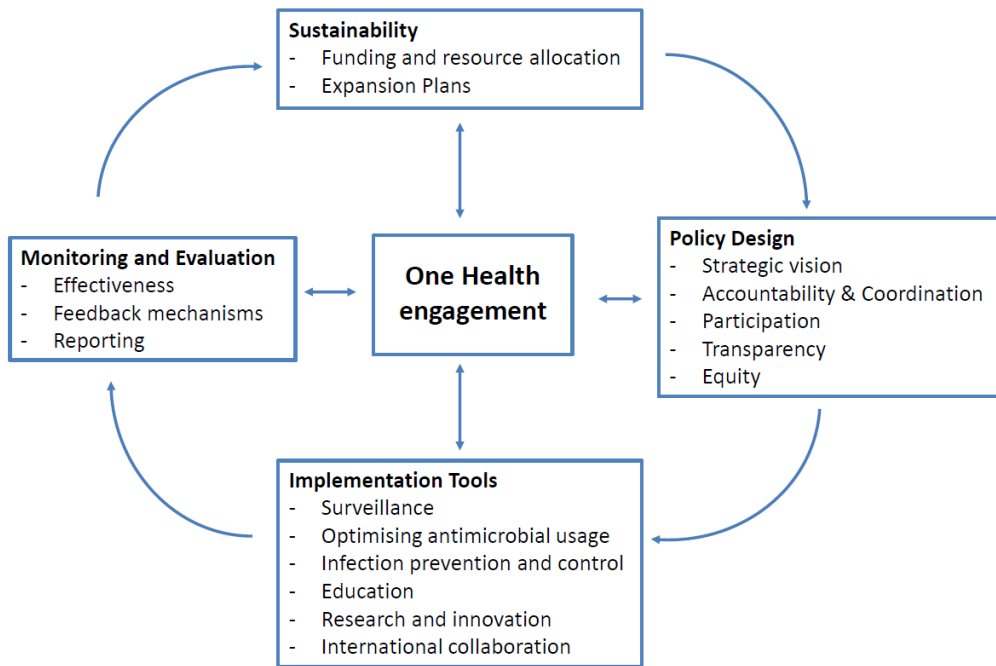
⁸ United States Dollar (USD) purchasing power parity (PPP) is used to equate currencies between countries, based on the currency's purchasing power for a select basket of goods in each respective country.

1532 capacity. It was established that good AMR policy governance is a significant determinant
1533 of success.¹¹⁴

1534 In 2019, European Observatory experts echoed this finding. Besides emphasizing the
1535 importance of comprehensiveness in national action plans, they indicated that
1536 implementation is the most difficult aspect of combatting AMR. Specific conditions must be
1537 in place and strong governance is a critical factor in achieving success.¹¹⁰

1538 A governance framework with 18 domains and 52 indicators has been found to be useful
1539 to address the dynamic nature of AMR. The framework is divided into three governance
1540 areas: "policy formulation," "implementation tools," and "monitoring and evaluation." The
1541 framework is designed as a cyclical process that is responsive to the context and enables
1542 for continual refinement and adaptation of AMR national action plans (**Figure 12**).⁸⁰ This
1543 approach has been used to analyse national action plans in Southeast Asia as a proof of
1544 concept.¹¹⁵

1545
1546 *Figure 13 Framework for continuous improvement and adaptation of national action*
1547 *plans for AMR*



1549
1550
1551 Source: Anderson et al. 2019¹¹⁰

1552 Part of Monitoring and Evaluation involves the selection of appropriate indicators.
1553 Developing indicators and targets for AMR action plans in the EU was one of the key
1554 recommendations ("calls to action") resulting from the Joint Action EUJamrai. Between
1555 2017 and 2021, the EUJamrai Project mapped and assessed participating countries,
1556 adopted a WHO tool for the EU, implemented infection prevention and control frameworks
1557 in five countries, and published a set of AMR guidelines for European countries.¹¹⁶ The AMR
1558 Policy Analysis Coding Tool is a potential solution. It is a quantitative technique for national
1559 action plan policy analysis.¹¹⁷ The tool provides empirical results that may be used as
1560 indicators of a country's priorities and AMR policy gaps. It may also help to create an AMR
1561 policy database and stimulate innovative policymaking in this way.
1562

1563 In February 2022, the WHO published a comprehensive implementation handbook for
1564 national action plans specific to the human health sector.¹¹⁸ The handbook focuses on
1565 implementation and monitoring and evaluation and emphasizes multisectoral governance.
1566 It offers 6 steps for sustainable implementation of national action plans:

- 1567 1. Strengthen governance
- 1568 2. Prioritize activities
- 1569 3. Cost the operational plan
- 1570 4. Mobilize resources
- 1571 5. Implement prioritized activities
- 1572 6. Monitor and evaluate

1573
1574 The chapters provide insight into the structures to be put into place and the processes or
1575 capacity building required. The handbook also provides links to existing tools to use to
1576 effectively carry out the recommended steps.
1577

1578 **Concrete implementation strategies for Member States to effectively carry out** 1579 **existing and planned policies to tackle AMR**

1580
1581 Part of implementation of a national action plan requires consideration of the conditions
1582 for successful deployment of a given intervention or packaged programme. Strategies that
1583 influence the effectiveness of specific AMR intervention have been examined, for instance,
1584 specifically with respect to POCTs. For instance, type of instrument, the number of times
1585 performing external quality assurance (EQA), performing internal quality control (QC)
1586 weekly, performing 10 or more tests weekly, and having laboratory-qualified personnel
1587 perform the tests were associated with good POCT performance.¹¹⁹ Similar factors should
1588 be examined and systematically evaluated for each component of the national action plan
1589 implemented.

1590 Good practice recommendations with respect to POCT implementation include use multi-
1591 dimensional checklist and multidisciplinary team work.¹²⁰ Several areas need to be covered
1592 such as technical description of the test, clinical pathway, patient stakeholders, economic
1593 evidence, test performance, usability and training. Another good practice with respect to
1594 POCT is Belgium's POCT framework, which is based on 4 priorities: (1) Extend the Belgian
1595 decree on certification of clinical laboratories to decentralised tests in primary care; (2)
1596 Introduce a separate reimbursement category for POCTs; (3) Introduce reimbursement for
1597 a limited number of specified POCTs; and (4) Set-up a Multidisciplinary POCT Advisory
1598 Council, the purpose of which is to draw up a model for reimbursement of POCT, to select
1599 tests eligible for reimbursement and to make proposals to the National Institute for Health
1600 and Disability Insurance (RIZIV/INAMI).

1601 **General implementation strategies**

1602
1603 The field of implementation science has dedicated research efforts on understanding
1604 implementation strategies. These strategies are separate from an intervention, program,
1605 or practice and can be defined as the "methods or techniques used to enhance the
1606 adoption, implementation, and sustainability of a clinical program or practice".¹²¹ They are
1607 proposed as a way to bridge the research-to-practice gap. A number of taxonomies of
1608 implementation strategies exist. The Expert Recommendations for Implementing Change
1609 (ERIC) study generated expert consensus on implementation strategies via a three-round
1610 modified Delphi process that refined prior work.¹²² The result was a final compilation of 73
1611 discrete strategies with definitions that represent a range of possible strategies that can
1612 be used to implement new programs and practices. Specific strategies may be selected
1613 based on a particular conceptual framework underlying implementation (e.g., the
1614 Consolidated Framework for Implementation Research (CFIR)¹²³ or Promoting Action on
1615 Research Implementation in Health Services (PARIHS) framework.¹²⁴ It may also be useful
1616 to develop a logic model, which is a type of program theory evaluation hypothesizing the
1617 proposed casual mechanisms through which a strategy is purported to induce change in
1618 the health system.¹²⁵ The systematic approach to selecting strategies emphasizes that

1619 context-dependent nature of effective systemic deployment of national plans. Each region
1620 or country will likely need different implementation strategies that are adapted or tailored
1621 to their needs. Box 2 identifies some key ERIC strategies relevant to implementation of
1622 national action plans to tackle AMR.

1623
1624 *Box 2 Common useful implementation strategies for systemic deployment to*
1625 *tackle AMR*

- | | |
|------|--|
| 1626 | 1. Build health information technology to support data-informed quality improvement |
| 1627 | - Adapt and tailor to context (e.g., via stakeholder input) |
| 1628 | - Use evaluative iterative strategies (e.g., audit and feedback, Plan-Do-Check-Act cycles) |
| 1629 | - Utilize financial strategies (e.g., funding and contracting) |
| 1630 | - Change infrastructure (e.g., records systems) |
| 1631 | - Provide interactive assistance (e.g., from local, trusted sources) |
| 1632 | |
| 1633 | 2. Build quality improvement (QI) capacity and improve outcomes |
| 1634 | - Provide interactive assistance (e.g., context-specific implementation facilitation) |
| 1635 | - Use evaluative iterative strategies (e.g., identify barriers and enablers, develop a local |
| 1636 | implementation blueprint or plan) |
| 1637 | - Support clinicians (e.g., reminders and regular contact) |
| 1638 | - Develop stakeholder inter-relationship (e.g., identify clinician champions of the |
| 1639 | program) |
| 1640 | - Engage consumers / patients (e.g., develop patient educational materials) |
| 1641 | |
| 1642 | 3. Enhance clinician and practice member knowledge |
| 1643 | - Train and educate stakeholders (e.g., develop and distribute educational materials, |
| 1644 | conduct outreach visits, provide on-going consultation and training) |
| 1645 | - Develop stakeholder inter-relations (e.g., visit other sites to share best practices) |
| 1646 | |
| 1647 | 4. Build connections across the health system (*adapted for AMS*) |
| 1648 | - Support clinicians (e.g., develop resources sharing agreements across facilities in the |
| 1649 | health system) |
| 1650 | - Engage consumers / patients (e.g., include diverse stakeholders – hospital, primary |
| 1651 | care centers and long-term care facilities - and patients on QI teams) |
| 1652 | - Use evaluative and iterative strategies (e.g., obtain and use feedback from |
| 1653 | stakeholders) |

1654 Source: Author's compilation based on ERIC implementation strategies ¹²² clustered by
1655 functional group ¹²⁶

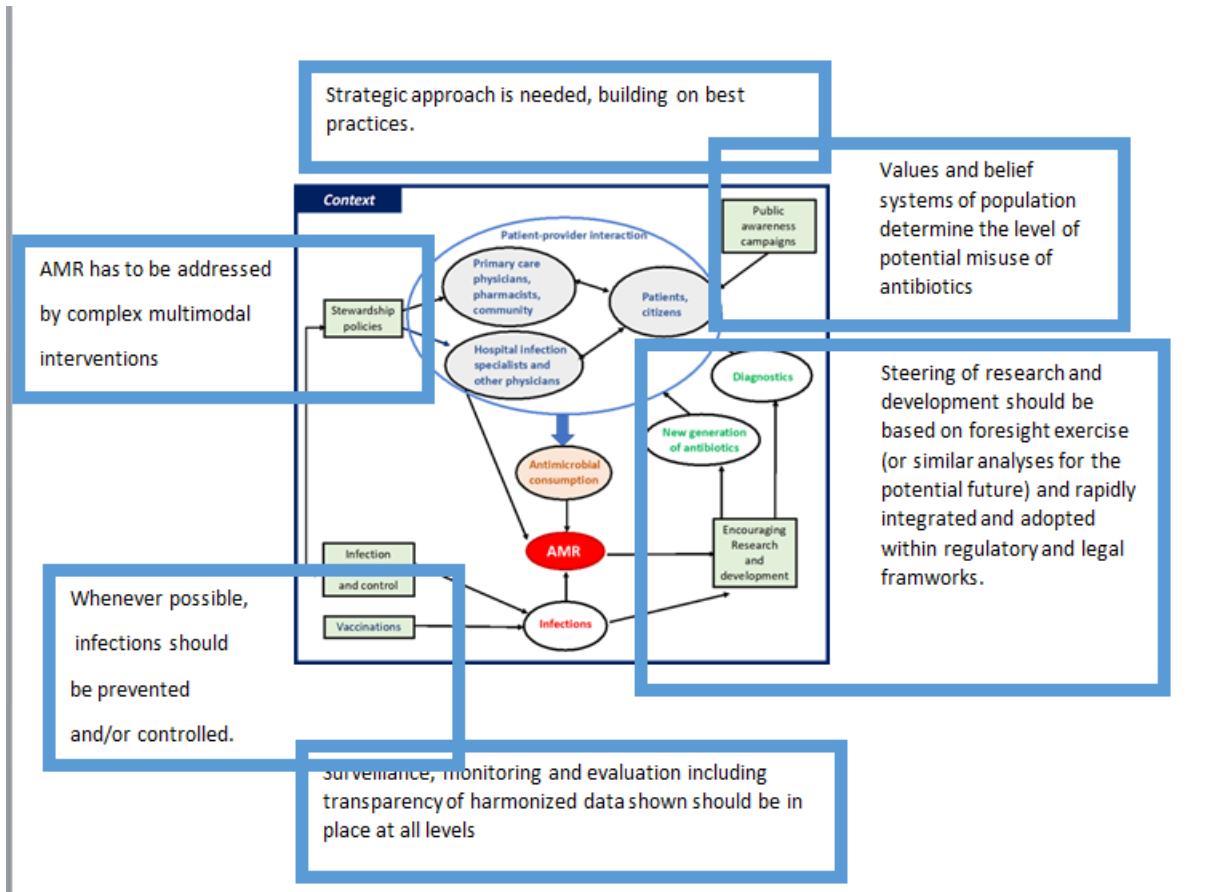
1656

1657 **3 Recommendations**

1658 In developing our recommendations, we explicitly build on the European Union's 2017 EU
1659 One Health Action Plan against AMR,¹ which provides a detailed assessment of the scale
1660 and nature of the threat posed by AMR and an extensive list of actions that the European
1661 Commission has committed to undertake. Selected examples from Chapter 2 of the plan,
1662 on making the EU a best practice region, are listed in Table 7. We fully endorse the Action
1663 Plan and do not seek to duplicate it.

1664
1665 Our recommendations build on the conceptual model presented earlier and are
1666 superimposed on them in Figure 15.

1667
1668 *Figure 15 The Expert Panel's recommendations for tackling AMR*



1669

1670 Recommendation 1: **As required under the WHO GAP approach, each Member state**
 1671 **should strengthen their systems for convening all AMR stakeholders and**
 1672 **improving the quality of their national assessments.** This requires a strategic
 1673 approach with support mechanisms in place. Comprehensive national assessments of the
 1674 quality of the plan content should continue, with emphasis on the effectiveness of plan
 1675 implementation. In addition to outcome indicators, process indicators need to be
 1676 incorporated into AMR plan monitoring and evaluating. AMR initiatives have to be seen as
 1677 essential parts of quality and safety actions in healthcare. MSs are holding the
 1678 accountability for the results and the adaptations of the actions, and committed to report
 1679 them regularly (every second year) at EU level.

1680 The European Commission should establish an annual system, that would involve a
 1681 collaborative effort by those Directorate Generals and Agencies most directly involved, to
 1682 report progress on the measures set and in the European One Health Action Plan against
 1683 Antimicrobial Resistance that would be published and presented to the Council and the
 1684 Parliament.

1685 EU should support exchange of evidence from research and experience of good practice
 1686 among member states on surveillance of AMR, ensuring the closest possible coordination
 1687 of organisations responsible for both human and animal health and the environment, with
 1688 a focus on generating information that can inform timely and effective policy responses,
 1689 as well as governance structures at all levels of health systems that increase the
 1690 effectiveness of such responses.

1691 Recommendation 2: **As set out in the EU One Health Action Plan against AMR, the**
 1692 **process of developing indicators for the surveillance, monitoring and evaluation**

1693 **of AMR should be completed.** The Member States and the EU should improve One Health
1694 surveillance through the collection and reporting of harmonized data on AMR and antibiotic
1695 consumption. Transparent surveillance, monitoring and evaluation across all sectors can
1696 continue to be facilitated by the EU. AMR data collection for animals should be expanded
1697 to human health.

1698 Recommendation 3: **Member states should ensure that there are stewardship**
1699 **systems in place throughout their health systems.** This requires Member States to
1700 address determinants of antibiotic prescribing based on evidence of what works, including
1701 education and training in shared-decision making between physicians and patients and in
1702 inter-professional collaboration among physicians, laboratory staff, and pharmacists. A
1703 combination of complementary and mutually reinforcing measures within a robust system
1704 of governance is needed that can ensure that those designated as responsible for the
1705 system have the appropriate levers to make it work. Implementation strategies like
1706 computerized reminders, outreach visits and clinical audits have demonstrated
1707 effectiveness. Such stewardship systems should be designed at MSs level, considering the
1708 gaps identified and the respective context. Multimodal interventions appear necessary to
1709 address appropriate antimicrobial prescription at the time of pandemics.

1710 EU should support exchange of evidence from research and experience of good practice in
1711 methods to reduce the incidence of nosocomial infections, drawing on a wide range of
1712 disciplines including, but not limited to, research on building design, clinical methods,
1713 epidemiology, and behavioral sciences.

1714 EU should support undertaking a review of potential innovative financing systems that
1715 provide the pharmaceutical industry with adequate incentives to develop new products
1716 while ensuring that both the risks and the benefits are shared by the public and private
1717 sectors.

1718 EU and MSs should continue to support exchange of evidence of good practice in creating,
1719 implementing, and monitoring clinical governance systems that encourage appropriate use
1720 of antimicrobials (including timely surveillance of prescribing data), thereby implementing
1721 provisions of the 2017 EU Guidelines for the prudent use of antimicrobials in human health
1722 and supporting research on ways of implementing these systems in different contexts.

1723 Recommendation 4: **Steering of research and development to tackle AMR should be**
1724 **based on foresight exercise and rapidly integrated and adopted within regulatory**
1725 **and legal frameworks.**

1726 Undertaking a foresight exercise to identify gaps in the existing range of antimicrobials and
1727 the pipeline of future products and, in consultation with the wider scientific community (in
1728 industry, civil society, and academia) identify potential solutions.

1729 Consistent with the EU One Health Action Plan against AMR, the EU should support
1730 undertaking a foresight exercise to identify the opportunities offered by advances in
1731 vaccine science, in particular those offered by mRNA vaccines, to reduce the burden of
1732 infections requiring treatment by antimicrobials and use the findings to inform a
1733 programme of research.

1734 The EU, in collaboration with Member States, should go beyond the Pharmaceutical
1735 Strategy for Europe and provide a clear strategic direction and goal-setting for
1736 pharmaceutical research and development of new antibiotics and emerging technologies.

1737 The EU and Member States should support initiatives that provide incentives through
1738 funding or other ways to stimulate the development of new antibiotics and testing.

1739 There is scope for Member States to improve the regulatory and legal frameworks to
1740 facilitate the rapid integration and adoption of appropriate new technologies. The EU could
1741 stimulate and facilitate harmonization of these standards and criteria across Member
1742 States.

1743 EU and MSs should be supporting research on diagnostic tools that can identify the agents
1744 causing infections and their susceptibility to antimicrobials and encouraging exchange of
1745 evidence of good practice in their use, including how best they can be incorporated into
1746 routine clinical practice.

1747 Recommendation 5: **Leverage the knowledge that values and belief systems of**
1748 **population determine the level of potential misuse of antibiotics.** There is scope
1749 for Member States to introduce targeted, well-designed and effective AMR public
1750 awareness campaigns. The EU can play a role in facilitating the sharing of best practices
1751 supported by demonstrated evidence through learning communities.

1752 EU should be supporting exchange of evidence of good practice in public engagement on
1753 the appropriate use of antimicrobials, drawing on insights from cognitive and behavioral
1754 sciences, with an emphasis on equity (given the risks that disadvantaged groups may be
1755 excluded) and on co-creation of messages and means of dissemination.

1756

1757

1758 LIST OF ABBREVIATIONS

1759	ACR	Acrosin
1760	AMR	Antimicrobial resistance
1761	AMS	Anti-Microbial Stewardship
1762	ATC	Anatomic Therapeutic Chemical (classification code)
1763	BTSF	Better Training for Safer Food
1764	CFIR	Consolidated Framework for Implementation Research
1765	CMg	Clinical Metagenomics
1766	CPE	Carbapenemase-producing Enterobacteriaceae
1767	CRISPR	Clustered Regularly Interspaced Short Palindromic Repeats
1768	CRP	C-Reactive Protein
1769	DALY	Disability Adjusted Life Year
1770	DDD	Defined Daily Doses
1771	DNA	DeoxyriboNucleic Acid
1772	EAAD	European Antibiotic Awareness Day
1773	EARS-Net	European Antimicrobial Resistance Surveillance Network
1774	ECDC	European Centre for Disease Prevention and Control
1775	eCDDS	Electronic clinical decision support systems
1776	EFSA	European Food Safety Authority
1777	EJP	Joint Programme
1778	EMA	European Medicine Agency
1779	EPHA	European Public Health Alliance
1780	EQA	External Quality Assurance
1781	ERIC	Expert Recommendations for Implementing Change
1782	ESAC-Net	European Surveillance of Antimicrobial Consumption Network
1783	EU/EEA	European Union / European Economic Area
1784	FAO	Food and Agriculture Organisation

1785	GAP	Global Action Plan
1786	GP	General Practitioner
1787	HERA	European Health Emergency Preparedness and Response Authority
1788	ICU	Intensive Care Unit
1789	IDS	Infectious Diseases Specialist
1790	IL-6	Interleukin-6
1791	IPC	Infection Prevention and Control
1792	JACG	Interagency Coordination Group
1793	JPIAMR	Joint Programming Initiative on AMR
1794	MDRO	MultiDrug-Resistant Organism
1795	mNGS	Metagenomic next-generation sequencing
1796	MRSA	Methicillin-Resistant Staphylococcus Aureus
1797	NA	Not available
1798	NIHDI	Belgian National Institute for Health and Disability Insurance
1799	NNT	Number Needed To
1800	OECD	Organization for Economic Cooperation and Development
1801	OIE	World Organisation for Animal Health
1802	PARIHS	Promoting Action on Research Implementation in Health Services
1803	PCT	Procalcitonin
1804	POCT	Point-Of-Care Tests
1805	Pro-AG	Pro-Active Genetic system
1806	QC	Quality Control
1807	QI	Quality Improvement
1808	RCT	Randomised Controlled Trial
1809	RNA	RiboNucleic Acid
1810	RTI	Respiratory Tract Infections
1811	SDG	Sustainable Development Goal
1812	SPHeP	Strategic Public Health Planning
1813	TrACSS	Tripartite Annual Country Self-Assessment Survey
1814	UI	Uncertainty Interval
1815	UltraPro	Ultrasonography point-of-care tests
1816	UNEP	United Nations Environmental Programme
1817	UTI	Urinary Tract Infection
1818	WGS-AST	Whole-Genome Sequencing for Antibiotic Susceptibility Testing
1819	WHO	World Health Organization
1820	WHO GAP	World Health Organization Global Action Plan
1821		

1822

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DRAFT

2292 **Appendix A**

2293

2294 *Performance Evaluation System in Italy*

2295

2296 In Italy, MeS Lab monitors antibiotics' consumption: 1) at the inter-regional level; 2) at
2297 regional level; and 3) through ad hoc analysis. The Inter-Regional Performance Evaluation
2298 System¹⁰⁹ currently encompasses the following indicators:

- Antibiotic consumption (community)
- Antibiotic consumption - under 14 years of age (community)
- Cephalosporin consumption - under 14 years of age (community)
- Quinolone antibiotic consumption (community)
- Injectable antibiotics proportion (community)
- Antibiotic consumption (hospital)
- Quinolone antibiotic consumption (hospital)
- Carbapenem consumption (hospital)
- Injectable antibiotics proportion (hospital)

2299 Five of the previous indicators are not only monitored, but rather benchmarked against
2300 standards that have been agreed by the Inter-Regional Performance Evaluation System.
2301 Standards are set according to the Italian Local Health Authorities' performance, and by
2302 comparing it with international performance. Table 7 reports the standards agreed in 2021.

2303 *Table 7 Benchmarking Standards for Antibiotic Consumption per Italian Local Health*
2304 *Authorities*

Indicator	Metric	Red band (bad performance)	Orange band	Yellow band	Light green band	Green band (great performance)
Antibiotic consumption (community)	DID	>25.50	22.50-19.50	19.50-16.50	16.50-13.50	<11.50
Antibiotic consumption - under 14 years of age (community)	DID	>28.00	28.00-23.60	23.60-19.20	19.20-14.80	<14.80
Cephalosporin consumption - under 14 years of age (community)	DID	>4.20	4.20-3.10	3.10-2.00	2.00-0.90	<0.90
Quinolone antibiotic consumption (community)	DID	>2.40	2.40-1.90	1.90-1.50	1.50-1.00	<1.00

Managing antimicrobial resistance across the health system

Injectable antibiotics proportion (community)	%	>2,30	2,30-1,80	1,80-1,20	1,20-0,70	<0,70
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2306 Ad hoc analyses are performed by MeS Lab. Figure 20 shows example data available.
2307 Current indicators include:
2308

- Proportion of Access antibiotics out of total antibiotic consumption
- Proportion of Reserve antibiotics out of total antibiotic consumption
- Local expenditure on antibiotics (per capita consumption and average cost per DDD)

2311
2312 Some of the previous indicators have been monitored and included in the Tuscan pay for
2313 performance scheme for Health Authorities' CEOs, as detailed in Table 8.

2314 *Table 8 Indicators used for monitoring and pay for performance scheme in*
2315 *Tuscany, Italy*

2317

Indicator	Level	Year	Goal
Antibiotic consumption	Community	2016	Less than or equal to 18 DDD per 1000 inhabitants per day
Antibiotic consumption	Community	2017	Less than or equal to 18 DDD per 1000 inhabitants per day
Antibiotic consumption	Community	2018	Less than or equal to 18 DDD per 1000 inhabitants per day
Antibiotic consumption	Community	2019	Less than or equal to 16.5 DDD per 1000 inhabitants per day
Antibiotic consumption	Community	2020	Less than or equal to 16,5 DDD per 1000 inhabitants per day
Antibiotic consumption	Community	2021	Less than or equal to 16.5 DDD per 1000 inhabitants per day
Quinolone antibiotic consumption	Community Hospital	- 2021	Reduction compared to 2019
Carbapenem consumption	Hospital	2021	Reduction compared to 2019
Incidence of amoxicillin	Community	2021	Reduction compared to 2019
Injectable antibiotics proportion	Community	2021	Increase of 50 percent compared to 2019
Consumption of carbapenems	Community and Hospital	2022	Reduction compared to 2019

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Consumption of amoxicillin	Community and Hospital	2022	Reduction compared to 2019
Consumption of quinolones	Community and Hospital	2022	Reduction compared to 2019
Antibiotic consumption	Community	2022	Less than or equal to 16.5 DDD per 1000 inhabitants per day

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