

PAN Germany Position

on

the staff working paper of the services of the Commission on antimicrobial resistance

(Hamburg, 31 March 2010)

Background

The European Commission (DG SANCO) has invited stakeholder for an online consultation on a staff working paper of the services of the Commission on antimicrobial resistance¹.

The purpose of the paper is to serve as a basis of discussion and further reflections on the ways to tackle the growing public and animal health problem of antimicrobial resistance (AMR). The working paper provides an overview of the activities already undertaken of the EU in combating the AMR in the past decades. The paper collects the activities related to AMR in the areas of public health, zoonosis control, animal health and welfare. It covers among others monitoring, risk assessment, risk management and research on AMR. It also identifies areas where further actions, like improvement of surveillance systems in human medicine and ensuring the prudent use of antimicrobials in animal husbandry, may need to be reflected. At the end of the consultation period (31 March 2010), a short report will be drafted with the main reactions and made available to all those who replied².

¹ EC (2009): Staff working paper of the services of the Commission on antimicrobial resistance. SANCO/6876/2009r6, 18.11.2009:
http://ec.europa.eu/food/food/biosafety/salmonella/antimicrobial_resistance.pdf

² Link to consultation: http://ec.europa.eu/food/food/biosafety/public_consultation_AMR_en.htm



PAN Germany position

PAN Germany welcomes the interdisciplinary work on (AMR) and the first efforts at EU-level, particularly provided by the European Commission's Scientific Committee on Emerging and Newly Identified Health Risks (SCENIHR) concerning the interlinkages between AMR and biocides use³. We also very welcome the new easy-to-read website on effects of biocides on antibiotic resistance established by DG Health and Consumer Protection based on the SCENIHR opinion⁴. This website supports transparency and the right-to-know for the public on this issue.

The website points out that "The possibility that the use of biocides could lead to the development of antibiotic resistant bacteria has already been indicated by several laboratory studies" and that "biocides could pose a direct threat to human health if they lead to the survival of some harmful bacteria which are resistant to antimicrobial products".

PAN Germany recommends the application of the precautionary principle and the implementation of concrete risk reduction measures although a final understanding on the relevance of biocides induced AMR is missing at the moment.

In principal, we also acknowledge the recommended activities on biocides-related issues like in the framework of the review programme pursuant to the Biocide Directive (98/8/EC), the need of reporting on relevant cases of AMR or to generate relevant quantitative data regarding exposure.

However we believe that the intended measures should be obligatory and completed with additional sufficient measures. In particular, we recommend:

1. Increase monitoring on biocides and AMR: Introduce a work programme and (time) schedule in order to establish guidance on how to monitor the development of resistance in environmental conditions of use of biocides. For the short-term it is necessary that the competent authorities should prescribe concrete data requirements which should be actively generated by the authorisation holder and the users. Such data should be annually evaluated and published by the competent national authority and the Commission. Interlinkages between AMR, release of disinfectants in the environment and the loss of biodiversity should be also investigated.
2. Intensify scientific research on biocides and AMR: It is necessary that scientific studies will be carried out in a systematic manner (coordinated studies in several countries) and that the

³ EC (2009): Assessment of the Antibiotic Resistance Effects of Biocides. SCENIHR opinion, adopted 19 January 2009: http://ec.europa.eu/health/ph_risk/committees/04_scenihr/docs/scenihr_o_021.pdf

⁴ Link to website „Effects of Biocides on antibiotic resistance“:
<http://ec.europa.eu/health/opinions/en/biocides-antibiotic-resistance/index.htm>



implementation of this approach is binding (in the document concerned relevant studies are only suggested). The Member States and the Commission should provide financial support, e.g. by research programmes.

3. Improve the biocide authorisation: Biocides of concern regarding the development of AMR has to be banned or permitted for restricted use only, accompanied by a mandatory post-authorisation monitoring, carried out by the applicants and controlled by competent authorities. The Commissions draft of a new biocide regulation (Com(2009)267 final) should be improved accordingly

4. Improve biocide monitoring: Reporting should be improved in order to get a better overview on biocide use in public/ private area as well as in professional area, particularly of sales volumes and exposure / impacts of disinfectants. The Commissions draft of a new biocide regulation (Com(2009)267 final) should be improved accordingly, e.g. annually reporting by the member states of all relevant data, harmonised statistics, systematic monitoring of market, use, human and environmental impacts by biocides etc.).

4. Public awareness raising and restrictions of specific biocide applications: There should be a clear legislation to avoid the use of disinfectants and treated articles with disinfectants in private households as they are not necessary in principle and as they are associated with many challenges for the development of AMR. All competent national authorities in Germany have been clear stated that disinfectants are not necessary in private households and that such applications is associated with human health risks several times⁵ However, there is no initiative by the industry for self-control of such products for private use. In contrast, the number of disinfectants and treated articles increase promoted by an aggressive advertisement in TV, newsletter and other media.

Therefore restrictions of such household disinfectants have to be implemented by the European and national legislation. In addition there should be established mandatory and EU-harmonised guidelines for the professional usage of disinfectants, e.g. for hospitals, food industry and others.

5. Support alternatives – Reduce risks: Efforts should be strengthened in order to support the development of sound alternatives of sanitation and preventative measures in order to reduce the probability of AMR-occurrence. For this, PAN Germany recommends an EU-wide and national action plans with concrete time table and objectives for risk reduction which should be established in a new EU Framework Directive on the sustainable use of biocides.

⁵ Common press release by the Robert-Koch Institute, the Federal Environment Agency and the Federal Institute of Risk Assessment „Antibakterielle Reinigungsmittel im Haushalt nicht erforderlich“. 22 August 2000: <http://www.bfr.bund.de/cd/890>



Strategies should be discussed and initiated to clarify how AMR can be reduced via communication, public awareness raising and capacity building, in cooperation with all relevant stakeholders.

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