ReAct - Action on Antibiotic Resistance
Response to the Draft recommendations of the ad hoc Interagency Coordination Group on Antimicrobial Resistance

KEY GENERAL MESSAGES

➢ We commend IACG on the strong emphasis on affordable and equitable access throughout the recommendations, and the link with the principles from the Political Declaration. There are strong reasons to reiterate the importance that present and future initiatives should follow all the principles already agreed on by the Member States.

➢ There is a lack of reflection on the process and the ways forward on how to implement the recommendations. We wish to see a more clear suggestion on who should be responsible to carry forward the recommendations, and more closely link them with global and national mandates and mechanisms for accountability.

➢ The relevance and importance of the individual recommendations would benefit from being framed within a larger systems perspective. All recommendations are connected and important for taking action. For example the role of civil society (C1) and how important their contribution to accelerate implementation of National Action Plans (A2).

➢ Make the urgency of reacting to the challenge of antimicrobial resistance more prominent in the recommendations. The imminent and already present threat posed by antimicrobial resistance must come across more strongly and that policy makers must urgently act and make it in connection with a pay now or pay much more later argument.

➢ Target-setting must be emphasized much more prominently throughout the recommendations. Targets must be set both at the country level and globally. Measurable and achievable milestones will serve as a crucial accountability mechanism.

➢ Conflicts of interest must be addressed at all levels of the recommendations, particularly where industry is suggested to play a role or contribute in global governance, financing, and implementing interventions on stewardship or access.

➢ The recommendations should more strongly emphasize the need to mainstream AMR into broader agendas on universal health coverage, sustainable development, water and sanitation, infection prevention and control, food production and sustainable environment.

1 Global discussions on AMR today are often mostly about antibiotic resistance (ABR) even if the AMR term is used more broadly. The AMR vs. ABR distinction should be kept in mind when discussing solutions for ABR because funding strategies and interventions for HIV, malaria and TB can be very different from tackling challenges of ABR in human, animal and environment sectors.
A. ACCELERATE PROGRESS IN COUNTRIES

Country action as detailed in Recommendation A1 is key for success. However, the efforts listed fall short of being “practical and feasible to implement”. Some concrete actions that could be taken as a first step are mentioned instead under considerations and should be lifted up. These include target setting, surveillance and addressing shortages and stock outs.

Recommendation A2 should present practical and feasible options for supporting countries to implement National Action Plans. There were several proposals that are worth highlighting here, including the ones raised in the IACG Discussion papers on National Action Plans, and on Meeting the Challenge of Antimicrobial Resistance: From Communication to Collective Action. For example:

- Support countries with the costing and prioritization of NAP implementation.
- Provide technical support in different sectors and for example in raising awareness and knowledge, surveillance, stewardship and IPC.
- Provide assistance to strengthen national regulatory systems.
- Map various stakeholders, programs, funding streams for AMR that are accessible for countries.

In the Considerations of Recommendation A2, a stronger case for target setting and data collection should be made. This could be framed as how essential data is for taking action, both for developing local/national guidelines and policies, increasing accountability and monitoring progress of the response. Building capacity and systems will be essential for country level surveillance of resistance and consumption data. Complementary data collection approaches will be important where there is not yet capacity to develop surveillance systems. Setting measurable targets is an essential accountability and monitoring instrument. There should be targets for access to antibiotics, curbing excessive use, and lowering drug resistance levels.

A key to action at country level has been the presence of champions and we commend the mention of champions in Recommendation A2, but would like to see their role expanded on in the Considerations. Creating networks of cross-sectoral national experts and champions can drive NAP implementation. These champions need to have the mandate and resources to for example engage stakeholders, build in-country collaborations, mobilize human resources, and ensure accountability.

Recommendation A3 is good as a first step, but it will be crucial to put in place monitoring systems to make sure use is not just re-labelled from growth promotion to routine prevention. It will also be important to create improved and sustainable animal husbandry conditions as antibiotic use can mask problems of infection control and decrease of antibiotics can have consequences for animal welfare if not addressed. Higher animal welfare is a goal in itself, and will lead to higher productivity and decreased antibiotic use as healthy animals do not need antibiotics.
B. INNOVATE TO SECURE THE FUTURE

- We commend the IACG for reiterating that “all research and development efforts to address antimicrobial resistance should be needs-driven, evidence-based and guided by the principles of affordability, effectiveness, efficiency and equity.” However, the principle of delinkage is completely missing from the recommendations, despite being put forth in the UN Political Declaration. The recommendation could specify that all the principles already agreed on by the Member States should be followed.

- Recommendation B1 should more clearly highlight the need for investments and innovation across different areas of research and development. We commend IACG on the last point of the considerations addressing the need to fund a broader research agenda within areas such as implementation and behavior change communication. This should be lifted into the main text of recommendation to highlight the urgency for committed funding within these domains. In relation to this there is a need to make the point that most existing international mechanisms for research and development do not have this specific focus, and that mechanisms for funding this type of research must be made accessible.

- We support the IACG that funding must be mobilized for innovation. However, under considerations for recommendation B1 and B2 a number of existing initiatives in R&D are named for which the IACG “recommends full and sustained funding”. As it stands it is unclear on what basis these initiatives have been selected. It would be advisable that a thorough independent analysis is conducted before resources and funding is committed to any specific initiative. A guiding principle could be to direct funding to new or existing initiatives if they follow the principles of being needs-driven, evidence-based and guided by the principles of affordability, effectiveness, efficiency and equity.

- Most current initiatives only cover parts of the drug development pathway. Incentives for R&D should focus on the scientific bottleneck of early drug discovery as well as address market and structural barriers to ensure affordable and equitable access to health technologies needed to address AMR.

- The call in recommendation B3 for “undertaking coordinated global mapping of research and development activities” would benefit from being elaborated on in the considerations. Most current efforts to map research efforts are not global, and there is a need for seeking broader inclusion and buy-in from in particular more LMICs in these initiatives. This could also be further expanded on and include a recommendation to develop a coordinated research agenda across the whole spectrum of sectors and disciplines.
C. COLLABORATE FOR MORE EFFECTIVE ACTION

- We commend that the IACG lifts the importance of CSOs and their role, and strongly commend the IACG for lifting the “Provision of political, financial and technical support for civil society organizations to enhance their engagement, including for work with governments” to secure that CSOs can have this important role. CSOs also have an important role in ensuring transparency and accountability in the National Action Plan implementation process, and so the recommendations should push for greater CSO involvement in the implementation of NAPs. It will important to safeguard this support from the global community, as in many countries the role of CSOs has been seriously challenged.

- Conflict of interest and due diligence regarding private sector engagement must be addressed under Recommendation C2. It is of particular concern that the recommendations promote the engagement of the private sector in ensuring access, equity, prudent use and stewardship. The involvement of the pharmaceutical industry in leading activities on prudent use and stewardship is a clear risk of being influenced by conflicting economic interests and marketing. A recent example is the partnering of the Indian Council of Medical Research with Pfizer to form a center that serves as a nodal point to launch pan-India interventions on Surveillance, Stewardship, Advocacy and Awareness, despite numerous evidence of huge conflicts of interest in pharmaceutical companies getting involved in stewardship efforts. The public sector must be in charge of securing access and equity, so it would be important that this role of the public sector is much more prominent in the recommendations.

D. INVEST FOR A SUSTAINABLE RESPONSE

- The structure of the recommendations could more clearly show that investments fall into three major categories: already existing funding that goes to AMR; applying an AMR lens to existing funding streams and approaches; the need for new financing mechanisms.
  - It is commendable that existing institutions and funds are recommended to give greater priority to AMR in their resource allocations. However, it should be noted that not all areas touched by AMR are covered by existing initiatives and financing streams. Making sure that funding exists for all areas should be a priority. There should be a better allocation of the money and investment into more cost-effective strategies such as IPC and improving health care systems.
  - Applying an AMR lens to existing initiatives is an important instrument that we agree with. However, for this approach to be effective, there should be a strategy to measure the results and impact of the funding. This should be supported by the availability and transparency of granular information on existing initiatives and funding flows on AMR sensitive workstreams.
○ Proposals for how new money also need to be raised to fulfill functions at both global and country levels, not only “relabeling” of existing funds. We have put forward several recommendations for future actions on financing that can be found in a paper published by ReAct and Dag Hammarskjöld Foundation².

● We are lacking a clear message on the urgency to mobilize investments at all levels. More concrete proposals should be made on financial solutions for the near future and longer term.

● The recommendations should more clearly reflect that investments are needed both on national and global levels. On a national level the recommendations should call for Member States to step up their domestic funding efforts for the implementation of National Action Plans. On a global level the recommendations should call for securing finance of the functions required for the global coordination of the response to AMR.

● There is a need to more closely link the considerations to each point of the respective recommendation, especially for D1, so it becomes more specific and concrete. The considerations should elaborate and provide clarity on practical and feasible ways forward on the proposed mechanisms to mobilize funding. South-south cooperation is mentioned but also north-south and triangular cooperation can serve the needs of LMICs. It could also be highlighted that such cooperation will have benefits not only for resource mobilization, but also for capacity building and knowledge sharing.

● Given the push for an increased mandate for the Tripartite, the recommendations should also call for the individual members of it to step up their funding towards AMR work within the Tripartite collaboration. An increased funding commitment by Member States toward the agencies is also needed to support capacity-building and enable technical assistance from the Tripartite to countries. Clear milestones and evaluation strategies should also be established to measure the progress of the Tripartite. If the Tripartite falls short, a larger UN response should be triggered.

E. STRENGTHEN ACCOUNTABILITY AND GLOBAL GOVERNANCE

● Under Recommendation E1, we commend the mention of the Committee on World Food Security (CFS) as a model governance mechanism. The responsibility and decision power of Member States must be emphasized in the proposal for global governance. The composition and operations of the One Health Global Leadership Group should meet the governance functions needed on a global level, including coordination at the intergovernmental level as well as across international agencies and organizations. The primary role of the global governance should be to facilitate national work and allow financing mechanisms

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to function properly. The responsibility and decision power of Member States must therefore be emphasized in the proposal for global governance.

- The consideration should bring clarity on how to avoid or manage conflict of interests in all governance structures and multi-stakeholder engagements. In this regard, we oppose SUN as a model governance example as its structure allows for industry interference. There is a need to better clarify the roles, mandates and functions of the different stakeholders in the multi-stakeholder partnership platform, by for example defining decision power and advisory roles of the governance structure.

- We commend IACG on Recommendation E2 to convene an Independent Panel of Evidence for Action against AMR. To ensure that the Panel’s work remains independent, its hosting, staffing and funding should not be tied to agencies that might otherwise have a vested interest. The value of this Independent Panel is to remain above, separate and truly independent of any particular intergovernmental agency’s efforts, and also focused on AMR-specific concerns.

- We commend IACG on Recommendation E4, on urging the finalization of the process of the Global Stewardship and Development Framework. There should be a clear call for the IACG recommendations to be considered in the Global Stewardship and Development Framework. However, in the first consideration, the IACG notes that “The IACG recommends that priority be given to adopting and implementing global standards and best practices established by the Tripartite agencies (FAO, OIE and WHO) and other international and national authorities, and that the current debates and discussions should not distract from this priority.” If focus is only on non-binding options such as sharing best practices, important pathways including legally binding options the Framework could consider may be lost.