Consultation on establishment of a One Health Global Leaders Group on AMR
ReAct Europe, 8 November 2019

ReAct Europe welcomes the opportunity to provide feedback on the proposed Terms of Reference on the establishment of a One Health Global Leaders Group on Antimicrobial Resistance (AMR).

We are concerned that the consultation only relates to the establishment of the Global Leaders Group as we strongly caution against such a group being established in isolation and not linked to an Independent Panel on Evidence and the Multi-Stakeholder Partnership Platform. A Global Leaders Group without the other two components will be a half-measure that won’t be sufficiently decisive and credible. The entire governance framework should be constructed at once (and each entity developed in parallel to each other simultaneously) to address any challenges that will emerge as to how different structures will relate to each other and to ensure no duplication of role or function. Otherwise, it might be difficult to correct such issues and make amends at a later stage. We also suggest examining the prior experience of the Committee on World Food Security (CFS), the reform of it defined the details of all components together in its Rules of Procedure.

We would like to express concerns of not including a broader group of other UN agencies within any global governance framework. The consequences of AMR reach far beyond health and One Health. It threatens poverty alleviation, global economy and development, and must be looked upon from a systems perspective where the overarching goal is to provide access to effective antimicrobials for all in need. To implement the IACG recommendations, greater commitment and engagement will be required of a diverse group of UN and intergovernmental agencies, from UNICEF and UNDP to the World Bank and UN Environment, as well as of groups from Unitaid to GAVI and the Global Fund to Fight AIDS, TB and Malaria. This should be a key goal for the Tripartite Secretariat and the Global Leaders Group. Leaving out the engagement of more multi-sectoral UN and intergovernmental agencies than the Tripartite in the proposed governance structure may send the wrong signal, and it is counterproductive to the strategy of making AMR a priority for all involved in sustainable development and system strengthening.

Furthermore, from the current Terms of References for the Global Leaders Group, it is suggested to include representatives from the Tripartite and some other selected UN agencies as members. However, it is our position that the UN agencies should not be voting members in the Global Leaders Group. A better approach would be to incorporate a broader spectrum of UN agencies, intergovernmental and other international organizations with advisory roles to the membership of the
Global Leaders Group, much like the existing role of UN agencies within the CFS. Further, we believe that philanthropies, while playing a critical role in building support, financing and partnering in the AMR response, should not have a privileged role within a future governance framework, and in particular, no representative of any philanthropic entity should be within the Global Leaders Group. Finally, the advisory roles of the civil society and other relevant constituencies, would appropriately be placed within the Multi-Stakeholder Platform. By Multi-stakeholder Partnership Platform, we wish to be clear that we are not suggesting a shadow governance structure, but rather an engagement platform that allows adequate consultation with public interest organizations and other relevant constituencies, with robust safeguards to protect against conflict of interest. Specifically, we would want to ensure that public interest NGOs, as opposed to those groups serving or funded by industry interests, are given a separate space to avoid clumping all civil society into the same mechanism.

**Specific remarks on the Independent Panel on Evidence:**

The need for independent and sound evidence is a well-acknowledged dimension of an effective and credible policy development process. In addition, for any governance mechanism to be globally respected and tasked to provide strategic direction and set priorities, it needs independent evidence to inform its decisions. Today there is no global, cross-sectoral mechanism to manage the assimilation of the rapidly expanding scientific literature on AMR, and there is a gap in providing independent and multi-sectoral analyses of existing evidence in a One Health context. There is also the need for a mechanism that can manage scientific disagreements and synthesize evidence from a systems perspective with engagement of experts from different disciplines. Such evidence and assessments will provide critical support to Member States, the Global Leaders Group, the Tripartite, other UN agencies, and other actors in designing strategies for addressing AMR. As such, an Independent Panel’s outputs would be an essential component of the global governance mechanism, to facilitate informed discussions and decision-making processes.

Adhering to the principles of transparency, scientific inclusiveness and independence is at the core of ensuring authoritative and credible outputs from the Independent Panel. To ensure that the outputs of the Independent Panel are authoritative, credible and legitimate, a rigorous and robust scientific process must be in place. Finally, the advice should be produced independent of the influence of governments and businesses, to safeguard from special and partial interests.

We do hope that these submissions would be taken up in earnest for consideration keeping in mind the crucial role that governance would play in tackling AMR and the urgency of moving in the right direction.