



“Antimicrobial Resistance - Recommendation for Broader Action.”

German Social Insurance welcomes the European Commission's initiative to maintain the effectiveness of antimicrobial agents for both humans and animals and to promote the development of new therapeutic and diagnostic tools. To reduce the risk of spreading diseases, serious illnesses and even death and to reduce the health, economic, social and environmental impacts of antimicrobial resistance.

A 2019 special report submitted by the European Court of Auditors found that a high health burden from antibiotic resistance is persistent. In particular, the dispensing of antimicrobial veterinary drugs is still far too high, despite some improvements, and this is partially responsible for developing resistance in humans and increasing resistance to reserve antibiotics. Considerable differences exist between the member states. German Social Insurance welcomes the legal measures taken by the European Union(EU) to prevent the misuse of antimicrobials in animals. German Social Insurance's view is that a further reduction in the dispensing of antimicrobial veterinary medicinal products and medicated feed is now a priority, especially as the EU has clear responsibilities in this area. Limiting the use of important reserve antibiotics to human medical purposes is what is important here. The metaphylactic use of antimicrobial drugs in animals needs to be reviewed against the background of the amended EU Regulation 2019/6 that covers veterinary medicinal products.

However, German Social Insurance's opinion is that infection prevention should now be given a higher priority than it has been given in the past. More investment is needed in responsible antibiotic usage programmes and the accompanying mass media campaigns. The member states must become involved in this process in a responsible manner. Infection prevention as well as infection control must be strengthened in both veterinary and human medicine and especially in health care facilities. Screening for resistant germs, hygiene measures in health and care facilities, staff and patient training, updated treatment guidelines, etc., can all prevent infections and the improper use of antibiotics can be avoided with comparatively little effort being involved. This was also confirmed in a 2018 report released by the OECD.

Rapid diagnostic procedures (CRP/POC tests), which can be evaluated directly in doctors' practices, are considered to be important with regard to widespread use. However, this is still questionable, because there is no scientific evidence of an additional benefit from these tests as compared to the usual laboratory tests with regard to antibiotic consumption or even reducing antimicrobial resistance.

Research and development into new antimicrobials, alternative treatments and vaccines is still an important component in the fight against antibiotic resistances. A market failure can be seen here, especially as reserve antibiotics have been withdrawn from widespread marketing for good reasons. The EC has spent more money on antimicrobial resistance research since 2000 than the all of the member states combined. Major breakthroughs have not been realised. Therefore, as part of

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the upcoming revision of pharmaceutical legislation, the development incentives, especially with regard to reserve antibiotics, that specifically address a predefined unmet medical need must be modified. Measures such as buying up patents or market entry premiums should also be examined. A public R&D subsidy for important new drug innovations should be reflected in a corresponding public return with full R&D cost transparency.