

15 January 2018

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Co-conveners of the Ad Hoc Interagency Coordination Group on Antimicrobial Resistance:

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Dame Sally Davies ([sally.davies@dh.gsi.gov.uk](mailto:sally.davies@dh.gsi.gov.uk))

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Cc: Ms Faith McLellan ([mclellanf@who.int](mailto:mclellanf@who.int)), IACG Secretariat; Dr. Ranieri Guerra ([guerrar@who.int](mailto:guerrar@who.int)), ADG WHO; Dr. Marc Sprenger ([sprengerm@who.int](mailto:sprengerm@who.int)), Director, AMR Secretariat, WHO; Mr. Nelson Muffah, Executive Office of the UN Secretary-General ([nelson.muffah@un.org](mailto:nelson.muffah@un.org))

Dear IACG Chairs and Co-Conveners,

We write to you today as part of the Antibiotic Resistance Coalition (ARC) along with other civil society partners. The ARC is an alliance of civil society organizations and stakeholders from across six continents that work within the health, agriculture, consumer and development sectors that use their voices to advocate and move forward efforts to prevent the spread of AMR.

We have been following closely the work of the IACG and submitted comments as part of the public consultation on the IACG workplan. We recognize the work being done by IACG to date and its key role in advancing the objectives of the UN Political Declaration on AMR and global action plans by monitoring global progress on AMR, ensuring cooperation across UN agencies and other stakeholders and providing a roadmap for sustained, effective action globally to address the AMR challenge.

The capacity of the IACG to undertake this work is not without limitations. One of these is the lack of funding. Another critical issue is the need for the IACG to ensure broad stakeholder consultation and engagement, together with transparency in all of its deliberations.

As agreed in the work plan and established as a priority in its fourth meeting, it is essential that the IACG seeks greater and continued engagement with stakeholders, allowing them to stay involved in IACG work.

We call on you to ensure that the IACG effectively implements this priority by reaching out more broadly to civil society organizations (CSOs) and faith-based organizations (FBOs).

The work of the IACG could be enriched through the yet-untapped resources of CSOs and FBOs, as sources of extensive knowledge of regional and national realities especially in rural parts of developing countries, with the ability to support country development and implementation of national action plans, including in the areas of awareness raising, behavioral change and service delivery.

In the annexed letter, we specifically refer to this IACG oversight. CSOs were not included in the CSO stakeholder consultation that was held during the fourth meeting of the IACG in October 2017 hosted by OIE in Paris, although engaging stakeholders from the livestock and animal health sector was a stated objective.

We recognize that the IACG is taking steps to convene a CSO panel during PMAC in Bangkok on 1 February 2018, though there are no details yet on the panel. We look forward to hearing from you as to how you will facilitate the engagement of CSOs as part of this meeting, as well as in the IACG's future meetings and policy deliberations.

Kind regards,

Alliance to Save Our Antibiotics (Europe)  
Centre for Science and Environment (India)  
Centre for Science in the Public Interest (USA)  
Consumers' Association of Penang (Malaysia)  
Ecumenical Pharmaceutical Network (International)  
Food Animal Concerns Trust (USA)  
Health Action International  
Health Care Without Harm Europe  
Initiative for Health & Equity in Society (India)  
Institute for Agriculture and Trade Policy (International)  
Keep Antibiotics Working Coalition (USA)  
La Fundacion IFARMA (International)  
ReAct Africa  
ReAct Asia Pacific  
ReAct Europe  
ReAct Latin America  
ReAct North America  
Sahabat Alam Malaysia (Friends of the Earth Malaysia)  
Sustainable Food Trust (UK)  
Third World Network (International)  
United States Public Interest Research Group (USA)  
What Next Forum

## Annex

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Professor Junshi Chen  
Dame Sally Davies  
Ms Martha Gyansa-Lutterodt

Cc:

Ms Faith McLellan, IACG Secretariat; Dr. Ranieri Guerra, ADG WHO; Dr. Marc Sprenger, Director, AMR Secretariat, WHO; Mr. Nelson Muffah, Executive Office of the UN Secretary-General

Dear IACG Chairs and Co-Conveners,

We write to you today as part of the Antibiotic Resistance Coalition (ARC) along with other civil society partners. The ARC is an alliance of civil society organizations and stakeholders from across six continents that work within the health, agriculture, consumer and development sectors that use their voices to advocate and move forward efforts to prevent the spread of AMR.

On October 17, the IACG held a session on the use of antibiotics in food production in Paris. Webcasted to the public, this event represented an important opportunity not only for IACG members to hear informed perspectives, but also to signal to the public the IACG's willingness to listen.

Remarkably, that opportunity resulted in two panels, without a single public interest, civil society perspective. Apart from the US Department of Agriculture's Agriculture Research Service, the two panels included all industry speakers, including representatives from the International Dairy Federation, International Meat Secretariat, International Egg Commission, International Poultry Council, Federation of European Aquaculture Producers, and Health for Animals (an organization representing manufacturers of veterinary pharmaceutical products). The absence of alternative perspectives to industry left the IACG without the opportunity to hear of many other dimensions of the problem of antibiotic use in our food production system.

This lack of civil society involvement in the IACG's first public consultation is concerning. Without hearing from civil society on the use of antimicrobials in animal health and agriculture, the IACG will be unable to fulfill its objective to "provide practical guidance for approaches needed to ensure sustained effective global action to address antimicrobial resistance."

Together, members of the ARC have come together to call on the IACG to increase the transparency of, and civil society involvement in, the IACG process. To round out the Paris meeting discussions, we urge the IACG to host a **civil society panel focused on antimicrobial use in animal health and agriculture**. This panel should be included in one of the upcoming IACG meetings and provide the opportunity for civil society voices, both present at the meeting and across the world, to present, ask questions and express their concerns.

The perspectives missed by the IACG, due to the composition of the panels in Paris, might have informed the group's deliberations to a host of concerns, including:

- The **emergence of plasmid-mediated colistin resistance** has sent shock waves throughout the global medical community as thirty countries have documented this resistance to a last-line antibiotic. Despite these high levels of concern, at least 10 countries continue to use colistin in food animal production; and in Europe where colistin was until recently the fifth most widely sold antibiotic for veterinary use, a tiered approach to curbing its use in Europe means that its use continues. If given the opportunity, civil society members could have asked what steps the IACG was considering to detect early and prevent the spread of the next emergent superbug.
- The **challenge of co-selection of resistance** suggests the need to reduce the use of all antibiotics, not just those critically important to human medicine. The use of targets, veterinary oversight and prescription tracking have contributed to the success stories in Europe. Diverse civil society representation would allow for the discussion to go further, covering **further solutions that are needed in view of the conditions in low- and middle-income countries**.
- Antibiotic use in food animal production is projected to increase by two-thirds between 2010 and 2030. Two-thirds of that increase will result from the greater demand for meat consumption, and a third from the shift to more intensive forms of livestock production. Hearing from voices representing healthcare, agriculture, consumer groups and the development community together would allow for a discussion of what **investments in improved animal husbandry practices or in lowering meat consumption** would together contribute best to a One Health approach to public health.
- The **antibiotic effluents from drug manufacturing** have become a source of environmental concern. However, most of the antibiotic active ingredients go into the drugs used in healthcare delivery and in food production systems, not into the effluent of manufacturing plants. Civil society voices working to prevent environmental contamination, as well as those involved in human healthcare and agriculture, could together call attention to the need--beyond just wastewater discharge from manufacturing plants--for the pharmaceutical industry and the agricultural sector to develop a plan for mitigating the significant run-off of antibiotics from farming operations.
- In missing civil society's perspective at the meeting, the IACG also has not heard of the important success of the **consumer movement in curbing antibiotic use in food production** by shifting demand in our restaurants, grocery chains, and schools and universities. Moving ahead of regulators, the people are taking steps to protect the future of antibiotic effectiveness.
- Lastly, civil society involvement would have allowed for a discussion of how the experience in the European Union suggests that without addressing the routine preventative use of antibiotics in food animal production, a ban on growth promotion may not be sufficient to turn around the level of antibiotics used. With the WHO's recommendations noting the **importance of curbing both growth promotion and routine preventative use of antibiotics in food animal production**, it is important to ask what inter-agency collaboration should follow.

This last concern, has brought ARC members together to also call on the IACG to include the **new WHO guidelines on use of medically important antimicrobials in food-producing animals in its report for the consideration of, and support by, Member States at the UN General Assembly and relevant international bodies**. These guidelines represent an important step in curbing the excessive use of antimicrobials in the food system.

ARC members were instrumental in calling for the creation of the IACG in the UN Political Declaration on AMR. However, the process has been less than transparent, and the public consultation process on antibiotic use in food animal production disappointing in its exclusion, to date, of civil society

perspectives. Civil society can offer useful insight and a deep reservoir of knowledge of regional and national realities as well as critical support in the implementation of National Action Plans on AMR. We hope that the IACG will take steps to address these concerns and to tap this resource.

Given the expertise, diversity and geographical spread of the ARC membership, we are also ready to provide names and contacts for the consultation process of the IACG.

Respectfully yours,

Alliance to Save Our Antibiotics (Europe)  
Centre for Science and Environment (India)  
Centre for Science in the Public Interest (USA)  
Consumers' Association of Penang (Malaysia)  
Ecumenical Pharmaceutical Network (International)  
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