

To: The European Commission
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Antimicrobial resistance – recommendation for greater action

SwedenBIO's feedback on *Call for evidence for an initiative (without an impact assessment)*.

SwedenBIO, the national non-profit association for the life science industry in Sweden, welcomes the opportunity to comment on the European Commission's call for evidence on antimicrobial resistance (AMR), that aims to set concrete objectives and activities to strengthen national action among member states against AMR.

We would like to emphasize the importance of thinking in new ways and combining knowledge across both research fields and borders. The national execution of policies directed at decreasing antibiotic use and increasing the use of alternative, preventive and complimentary treatments must be quicker - we need enforcement of stricter and harmonized requirements for use of antibiotics across the EU.

Here are some concrete actions we would like to see happen. Starting off with health economics and economic measures; an area where further support and guidance would be extremely valuable, particularly for Small and Medium sized Enterprises (SME). Healthcare expenditure represents a major cost to society; developing products that reduce hospitalization rates due to AMR related infections would result in significant savings. Unfortunately it is still a competence that most SMEs are lacking. As for economic measures the work with *push* and *pull* initiatives should continue. *Push* initiatives that accelerate new innovations are needed to derisk R&D stages for SMEs and likewise *pull* initiatives are required overcome market failures. Two *pull* initiatives are currently being discussed: *Subscription Contract* and *Transferable Exclusivity Extension (TEE)*. However, none of these options alone satisfy all needs. We suggest the solution may be a hybrid model combining TEE at an EU level with a *Subscription Contract* at national level, to balance the needs of innovators, healthcare systems and patients.

Furthermore, we suggest pooling resources internationally to create knowledge programmes for healthcare providers that evaluate and educate about the preventative actions required to decrease the risk of AMR-related infection. Such programmes could

include lists of alternative treatments for a specific indication and direct links to proof of concept and trustworthy information. In addition, we would like to see a clarification and mapping of all AMR-related initiatives on an EU level, to ensure efficient project investment. This would also simplify learning from successful projects such as Sweden's *Strategic Programme Against Antibiotic Resistance* (Strama) and help develop EU stakeholder platforms to exchange knowledge and implement treatment guidelines and policies. Finally, an evaluation of previous and current national programmes should be made to investigate results and learn from them.

However, we also firmly believe coordinated actions between countries to tackle the problem are crucial since AMR is a global health threat. For example, Sweden together with the UK has been piloting entirely novel procurement and reimbursement mechanisms for antimicrobials. Novel models and international coordination are something more countries should explore since it will be important for *pull* initiatives to continue and have an effect. Also, the work of European Health Emergency Preparedness and Response Authority (HERA) supporting research and realisation of new medical countermeasures is important and should be strengthened.

Lastly, SwedenBio would like to continue this dialogue and provide input to the suggested consultation strategy drawing on our experience as iii) researchers and innovators and as v) health technology and pharmaceutical industry stakeholders.

Sincerely,
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About SwedenBIO

SwedenBIO is the national non-profit association for the life science industry in Sweden, with more than 300 members. Sweden has an innovative life science industry, strong academia and world leading infrastructure for research. SwedenBIO's members are companies active within pharma, biotech, diagnostics and medtech and comprise the entire range from small start-ups, to SMEs and large enterprises. Many are engaged in research and development. Other members are experts in fields such as IP, law, finance, product development, life science communication, and business development. SwedenBIO works to create the optimal conditions for these actors to succeed.