

Brussels, 10 April 2018

Dear Mr Timmermans,

We write in relation to the risks to human health and the environment posed by releases of pharmaceuticals into the environment. In particular, we are very concerned about how these releases affect ecosystems and are contributing to the development of antimicrobial resistance (AMR), one of the major threats to human health today. We would like to discuss with you the opportunities that the Commission has in the coming months to spearhead action against the global rise of drug resistance, including within the framework of its Proposal for a Regulation on veterinary medicinal products and its upcoming Strategic Approach to Pharmaceuticals in the Environment.

In its report on *Frontiers 2017: Emerging Issues of Environmental Concern*, UN Environment identifies growing AMR linked to the discharge of drugs and particular chemicals into the environment as one of the most worrying health threats today.¹ Indeed, experts view the promotion of antibiotic resistant bacteria as “by far the greatest human health risk” posed by the presence of pharmaceutical residues in the environment and note that, in addition to fostering the spread of resistant pathogens, antibiotic residues can also turn harmless environmental bacteria into carriers of resistance.²

Europe’s AMR burden in terms of lives lost, morbidity, healthcare costs and productivity losses is much greater than currently available statistics suggest. Recent projections estimate a 15-fold increase in morbidity in Europe due to AMR by 2050, with 390,000 deaths every year as a result of drug-resistant infections.³ The use of antibiotics in intensive livestock farming promotes the development of resistant bacterial strains and the environment plays not only an important role in the spread of those, but also wildlife organisms and ecosystem services are at risk.⁴

We are concerned that the pharmaceutical industry is currently excluded from any kind of environmental legislation, which is untenable in the light of the risk that pharmaceutical pollution poses to the environment and to human health. We expect legislative action from the Commission to tackle this issue, similar to the regulation of the chemical industry through REACH.

Since AMR is a quintessential cross-border issue, it is important that the EU-One Health Action Plan against AMR is supported by policy measures and legislation in other areas, along the lines with those proposed in our recent briefing⁵ on policy options to be considered in the context of the Strategic Approach to Pharmaceuticals in the Environment and the proposal for a Regulation on veterinary medicinal products⁶ to ensure that we tackle the problem in a comprehensive way.⁷

We would therefore like to request a meeting with you to discuss the main policy measures available to successfully tackle this problem.

Yours sincerely,



Nina Renshaw,
Secretary-General,
epha



Nusa Urbancic,
Changing Markets
Foundation



Anders Bolmstedt,
President of the
Board
HCWH Europe



Jeremy Wates,
Secretary General,
EEB



Dr. Peter Clausing
Executive board
PAN Germany

¹ UN Environment, December 2017, Antimicrobial resistance from environmental pollution among biggest emerging health threats, says UN Environment

www.unenvironment.org/news-and-stories/press-release/antimicrobial-resistance-environmental-pollution-among-biggest

² Ågerstrand, M., Berg, C., Björleinius, B., Breitholtz, M., Brunstrom, B., Fick, J., Gunnarsson, L., Larsson, D.G.J., Sumpter, J.P., Tysklind, M., Rudén, C., 2015. Improving environmental risk assessment of human pharmaceuticals. Environ. Sci. Technol. <http://dx.doi.org/10.1021/acs.est.5b00302>

³ Antimicrobial Resistance: Tackling a crisis for the health and wealth of nations, URL: https://amr-review.org/sites/default/files/AMR%20Review%20Paper%20-%20Tackling%20a%20crisis%20for%20the%20health%20and%20wealth%20of%20nations_1.pdf

⁴ Ecological Impacts of Veterinary Pharmaceuticals: More Transparency - Better Protection of the Environment http://www.pan-germany.org/download/veterinary_pharmaceuticals/tierarztnei-EN-160321-web.pdf

⁵ Policy options for regulating pharmaceuticals in the environment

<http://eeb.org/publications/31/chemicals/89560/policy-options-for-regulating-pharmaceuticals-in-the-environment.pdf>

⁶ Antibiotics in Livestock Farming. What can be done to reduce environmental threats and avoid the development of antibiotic resistance? http://www.pan-germany.org/download/veterinary_pharmaceuticals/Antibiotics_in_Livestock_Farming.pdf

How to tackle the environmental pollution by Veterinary Pharmaceuticals? http://www.pan-germany.org/download/tierarztneimittel/PositionStatement_ENGL_F.pdf

⁷ EPHA Position on the AMR Action Plan (2017), <https://epha.org/prevention-is-better-than-cure-europes-chance-to-act-on-amr-is-now/>