



CPME/AD/EC/300710/094_Final/EN

On 30 July 2010, CPME Executive Committee adopted the “CPME Reply to the Commission Consultation on Pandemic Influenza Preparedness and Co-ordination” (CPME 2010/094 Final EN)

CPME Reply to the Commission Consultation on Pandemic Influenza Preparedness and Co-ordination

1. It is important that individual country's plans work well with other countries in the EU.

Strongly Agree

2. Co-operation between Member States on pandemic influenza preparedness would help enhance preparedness at a national and European level.

Strongly Agree

3. There is a need for the European Commission to assist Member States in co-ordinating in areas of pandemic influenza preparedness and response where there is a cross border aspect involved.

It is precisely because communicable diseases do not know borders that these turn into pandemics. Therefore, a common preparedness and response would certainly help to face the pandemic when it comes.

At EU level, the European Commission and ECDC can potentially provide useful tools for this purpose.

However, in the CPME's view, the Commission and ECDC did not succeed in taking on the tasks of coordinator and advisors of the Member States during the H1N1 2009 crisis in a sufficient manner. Substantive communication was lacking and the inherent danger of excessive EU bureaucracy lead to slowed down or complicated procedures, when the crisis context would have required especially efficient procedures.

In retrospect, there is a strong need to first analyze how the crisis was managed and how the EU and ECDC performed. It will only then be possible to redefine and eventually properly enhance their role.

4. If strongly agree or agree, please describe the role you believe the Commission should take and how this would aid preparedness.

Once the review process has taken place and the role of the ECDC is firmly implemented, the CPME could envisage that the Commission takes on a facilitating, leading role, for example by considering a proposal of guidelines for member states and a common public relations strategy in order to improve coordination.

5. It is important that there is a plan in place at European level to support interoperability of Member States plans.

Agree

6. The interoperability of Member States plans should be facilitated at European level.

Agree

7. If strongly agree or agree, please describe how you think this should be done

A facilitating, possibly leading role, giving rise to coordination meetings, passing out information, etc.

8. Cross border issues within the EU complicated the response to pandemic (H1N1).

Disagree

9. If strongly agree or agree, please describe the cross border issues that arose. Please give as much detail as possible.

For the specific case of Switzerland- since it is not part of the EU- the cross border issues did complicate the response to the pandemic. The Swiss Medical Association reported difficulties for example with the admission procedures of the vaccines, which had to be repeated for each vaccine.

10. Stronger co-ordination of pandemic preparedness and response at European level would have reduced the impact of cross border issues that arose.

Agree

11. Please describe possible European level actions you believe would have prevented or lessened the impact of cross border issues you have identified.

Better-planned coordination, for example vaccination prevention programmes drawn up at EU level and implemented in all MS, could reduce or lessen the impact of cross border issues. For Switzerland, exchange of information (and on the Swiss side the possibility to have full knowledge of and the possibility to use the recognition procedures of the vaccines) would have enormously simplified their procedures.

16. The EU plan should be updated in the light of recent developments and lessons learnt from pandemic (H1N1) 2009.

Strongly Agree.

In order to indeed be able to learn lessons from the pandemic (H1N1), there is a strong need to first analyze how the crisis was managed and how the EU and ECDC performed. Only after such an analysis it will be possible to determine how work could be improved and how to update the EU crisis response plan.

17. Please identify any areas of the plan you think should be reviewed in particular or that are missing altogether from the 2005 plan.

Please refer to answer 26.

It needs to be defined what is exactly understood by the term 'pandemic' and also who is entitled to declare the pandemic.

18. The following are reasons the 2005 plan should be reviewed

Review of the IHR (International Health Regulations)	Agree
Review of WHO guidance	Strongly agree
Need for better Intersectoral preparedness	Agree
New developments in medicine and science	Agree
Other - please specify	-

19. Better co-ordination of national pandemic plans could be helped by a revision of the EU preparedness plan.

Strongly Agree

20. Please give reasons for your answer to 19

Some elements of the EU crisis response plan can be included into national plans. Furthermore, there is a need for enhanced common activities.

21. Member States should ensure their national pandemic plans are coherent with the EU plan.

Agree

22. If strongly agree or agree, how would this best be achieved?

The EU crisis response plan should be shared as widely as possible and national authorities should be consulted at the earliest stage.

23. It is important to maintain the link between WHO pandemic alert phases and EU preparedness planning.

Strongly Agree

24. Please explain your answer to 23

See answer 27 below

25. The pandemic plan should be modified to take disease severity into account.

See answer 27 below

26. The EU should maintain the ability to declare a pandemic independent of WHO.

Disagree

27. Please explain your answer to 26

Ideally, and in order to maintain clarity which is crucial during alert phases, the WHO should be the only one body declaring the pandemic. Its procedures should be revised, so they are clear, efficient and reliable.

Nevertheless, as the WHO in 2009 modified the definition of pandemic alert phases to take the speed of proliferation of the disease into account and no longer give any information on its severity, this essential information is now lacking. CPME advocates that the ECDC should be responsible for providing information on disease severity (for Europe) and consequent recommendations to the Member States.

This should take place in close cooperation with the WHO in order to avoid ambiguous messages.

Additionally, the ECDC's early warning and response systems for pandemics should be further developed for this task. In particular, guidelines on the way national systems report to the ECDC could be proposed, so that they work in a coordinated and consistent way with the ECDC.

-Questions 28 to 33 on Monitoring and assessment for public authorities only-

Prevention and containment (including contact tracing, antivirals and vaccination)

34. There should be action at a European level to better facilitate the sharing of information on current containment and mitigation strategies across the EU.

Agree

35. If strongly agree or agree, please describe how this could happen.

This should be organized by the European Commission administration in cooperation with the Member State's ministries of health.

36. It would be useful to share the rationale and evidence behind Member State's strategies across the EU.

Agree

37. The EU should provide all Member States with up to date advice on public health strategies and the evidence behind these to aid their decision making in a pandemic.

Agree

38. Joint procurement or sharing mechanisms for pandemic vaccines at EU level would help ensure all MS have timely access to vaccines.

See answer 45 below

39. Joint procurement or sharing mechanisms for pandemic vaccines at EU level is desirable.

See answer 45 below

40. The European Commission should issue guidance on priority groups for vaccination to assist Member States implement pandemic vaccination programmes.

See answer 45 below

41. The EU should consider the development of a virtual stockpile of pandemic vaccine to facilitate sharing of vaccines among Member States in case of outbreaks.

See answer 45 below

42. The EU should consider working with Member States to develop virtual stockpiles of other medical countermeasures to facilitate sharing among Member States in case of outbreaks.

See answer 45 below

43. If strongly agree or agree, please tick which of the following you think should be considered for a virtual EU stockpile (ie; a sharing mechanism between member states not based on sharing of supplies in an outbreak).

See answer 45 below

44. The European Commission should take the lead role in managing any virtual stockpiles created.

See answer 45 below

45. If you have any other comments on virtual stockpiles or other alternative approaches please outline here.

Joint procurement mechanisms and/or the creation of virtual stockpiling of vaccines, antivirals, etc. would imply a shift of competences and funds from member states to the EU level. Before any such considerations can be made, the role of the EU and the ECDC must be reviewed fundamentally. Only once both entities have has proven their efficiency, good coordination, etc., it will be an option to consider a central EU stockpile.

46. The EU should consider working with Member States to develop a physical stockpile of medical countermeasures.

See answer 45 above

47. If strongly agree or agree, which of the following do you think should be considered for a physical EU stockpile?

See answer 45 above

48. The Commission should provide guidance on travel restrictions to Member States.

Agree

49. A more co-ordinated EU approach to port/land border health measures (such as entry / exit screening and advice for travellers) is needed.

Agree

Health systems response

50. The potential for co-operation and sharing of health services resources between Member States at times of pandemic should be explored at EU level.

Agree

51. Member States should consider how spare capacity within their health services (for example Intensive Care Units) could be used to assist other Member States who are affected by a pandemic.

Agree

Communication

52. Communication of public health information to citizens could be better supported at EU level.

The principal communication should take place at national level. However, in order to avoid contradicting messages, the national communication should be coordinated at EU level.

53. If strongly agree or agree, please describe how you think this could be improved.

54. Communication of information to health professionals could be better co-ordinated at European level.

Agree

55. If strongly agree or agree, please describe how you think this could be improved.

It is important to distribute expert opinions to health professionals across the EU.
A special commission (for instance a scientific group of ECDC) could be responsible for analyzing the incoming data.

As far as doctors are concerned, the information can best be provided through the National Medical Associations to its members.

European organizations based in Brussels such as the CPME (Standing Committee of European Doctors - Comité Permanent des Médecins Européens) can be the link to provide the information to the National Medical Associations (they are the CPME members).

International Co-operation

56. Do you have any views or ideas on how co-operation between the EU and non EU countries should be improved?

Switzerland should be included in the work of EU Agencies and in public health procedures such as Pandemic Plans.

57. What kind of (multi- or bilateral) relations to non-EU countries have been important for your country during the response to the Pandemic (H1N1) 2009?

Multi sectoral preparedness

58. It is important that sectors other than health have business continuity plans in place to ensure they can continue to operate during a pandemic.

Agree

59. The following sectors are critical and should have business continuity plans in place to ensure they can continue to function during a pandemic.

Energy	Agree
Water	Agree
ICT (Information- and communication-technologies)	Strongly Agree
Transport	Agree
Food	Agree
Chemical industry	Agree
Education (e.g. schools)	Agree
Civil protection (police, fireworkers)	Strongly Agree
Funeral providers	Agree

60. If there is another sector that you think is essential please identify it below and outline why it is so important.

61. Member States should ensure that critical sectors have business continuity plans in place.

Strongly Agree

62. The European Commission should take a coordinating role in multi-sectoral preparedness planning involving trans-national companies at EU level.

63. There are cross border implications for organisations / companies in the event of a pandemic.

Agree

64. Please highlight any specific cross border implications you have identified below.

65. Would your administration / organisation / company be willing to share your business continuity plan and best practice with other countries / competitors?

Yes

66. Has your administration / organisation / company participated in any cross sectoral planning simulations?

No

67. Would your administration / organisation / company be willing to participate in pandemic simulations to test planning in the future?

Yes