

# Australian Society for Antimicrobials

ABN: 31 081 739 370

PO BOX 6705  
East Perth 6892  
Western Australia

W. [www.asainc.net.au](http://www.asainc.net.au)  
E. [info@asainc.net.au](mailto:info@asainc.net.au)



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Dr Denison Chang  
Consultant  
Biointelect  
[dchang@biointelect.com](mailto:dchang@biointelect.com)

Dear Dr Chang

## **RE: Review of the draft AMR One Health Surveillance System Plan**

Thank you for giving the Executive Committee of the Australian Group on Antimicrobial Resistance (AGAR) the opportunity to review the draft document “One Health Antimicrobial Resistance and Antimicrobial Usage Surveillance System – A One Health Surveillance System (OHSS) Plan”.

Although high level, the plan is thorough and provides practical steps to implementation. The phased approach with different rates of development between the health, and animal/environmental/food sectors is sensible and reflects the different stages of maturity in these sectors.

The AGAR Executive fully supports the four overarching principles of the plan for the development of an effective OHSS. In particular, we strongly support principle 4:

“That information for action will be maximised by linking (ultimately) with determinants and outcomes of AMR and AMU, requiring a vision for long term integration with other national data assets.”

We fully support the concept of better integration of the unique datasets that contribute to our national AMR and AMU approaches.

We are pleased to see the need for sustained funding for surveillance is recognised in the plan. A properly funded surveillance program in each jurisdiction and mechanisms/funding to act on that information when needed are critical. Similarly, we are pleased the plan identifies the need for investment in laboratory and IT infrastructure. We believe a review of

the funding mechanisms for AMR testing and characterisation (ie extended phenotypic AMR, PCR, NGS) is timely.

It is not clear in the plan if there will be an action arm beyond data collection/data linkage. However, this may be outside the scope of the plan. Similarly, the governance and integration arrangements with a future ACDC is not mentioned.

#### **AGAR specific issues**

- We welcome the opportunity to link AGAR data linkage with animal and environmental health AMR data. Our major concern, however, involves data management and ownership, as this is not clear in the plan. Who will manage the secondary use of AGAR data, ie once all the data is pooled?
- Although probably more relevant to other AURA programs, we do not believe it is realistic shorter reporting periods can be applied to the AGAR AMR surveillance programs.

Although we recognise this is a high-level document, we are disappointed there is nil or minimal acknowledgement of the current mechanisms of AMR/AMU data surveillance, ie ACSQHC, AURA, AGAR, APAS, NAUSP, NAPS, CARAlert, AGSP, AMSP.

Although we acknowledge there is a need to develop a higher level of AMR surveillance in the non-human sectors this does not apply to the human sector. However, a baseline assumption of terra nullius is prominent in the document, with an inference the AMR surveillance problem in Australia is a lack of any system to analyse and report rather than lack of funding for surveillance analysis. This inference allows an argument that the existing systems are flawed in their approach rather than simply being underfunded.

Overall, we are supportive of the plan. However, we recognise data governance will be critical. The OHSS may be more effective as a distributed network which maintains state sovereignty in our federated system, or at least has operational controls embedded in each jurisdiction, directly proportional and related to the operational responses the data should be driving. Unless the OHSS takes over the action arms, or the governance can be embedded or properly integrated with state-level actions, we believe the disconnect between data and action will be inefficient and expensive.

Kind regards



Professor Geoffrey Coombs  
Chair AGAR  
President ASA  
On behalf of the AGAR Executive Committee