



EVM reply to the public consultation on the GREEN PAPER on the EU Workforce for Health

EVM welcomes the Commission's initiative on the European Workforce for Health, which will contribute to build up the European Public Health Capacity required to cope with major health challenges, such as public health threats, diseases outbreaks, healthy ageing etc.

In its Green Paper, the Commission rightfully highlights the importance of some critical elements that will contribute to the successful adoption and the proper implementation of effective vaccination policies. This will in turn deliver appropriate and efficient responses to health challenges:

1. The promotion of patient safety and the prevention and control of infections, especially by ensuring the implementation and the extension of existing national recommendations regarding healthcare workers vaccination
2. Develop life-long learning to ensure periodic review of existing vaccine preventable diseases
3. Ensure adequate training in the area of vaccination to build up the necessary public health capacity and capabilities required for major health threat

1. Patient safety, including the prevention and control of infections through vaccination of the healthcare workers

Patient Safety constitutes a major health issue, as identified by the Commission in the White Paper "Together for Health: A Strategic Approach for the EU 2008- 2013". EVM agrees with this statement and strongly believes that it deserves an integrated approach in all relevant EU initiatives due to its critical role in the control and prevention of infections.

a. Hospital acquired infectious diseases and existing recommendations for vaccination

The Commission started implementing its strategies through initiative such as the Proposal for a Council Recommendation "on patient safety, including the prevention and control of healthcare associated infections".

EVM members companies are major suppliers of vaccines worldwide, producing the majority of vaccine doses in Europe. EVM members are: Baxter, Crucell, GlaxoSmithKline Biologicals, MedImmune, Novartis Vaccines, sanofi pasteur, sanofi pasteur MSD, Solvay Biologicals, and Wyeth Vaccines

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Several elements are essential to contribute to the prevention and the control of healthcare associated infections, such as respect of principles regarding hygiene, rationale use of antibiotics but also the vaccination of Health Care Workers.

According to the US Centers for Disease Control, 28 infectious diseases can be contracted in Health Care Environment¹ and most of them are vaccine preventable. For instance, each year in Europe, 304,000 persons working in a Health Care environment are injured with a Hepatitis B contaminated object². Similarly, pneumonia is known as one of the four diseases most commonly caused by a nosocomial infection³, including influenza. Influenza vaccination is documented to be an effective measure against pneumonia and is recommended by WHO⁴.

Health Care workers constitute a major factor of transmission to patients of nosocomial infections. Therefore, vaccination of the health workforce is recommended by WHO to limit the contagion of the workforce but also to ensure patient safety. WHO recommends vaccination of Health Care Workers against the following diseases⁵:

- Hepatitis A
- Hepatitis B
- Measles, Mumps and Rubella
- Varicella
- Pertussis (vaccination diphtheria, tetanus and pertussis)
- Meningitis (vaccination Neisseria meningitides)
- Influenza

Furthermore, vaccination of health care workers is also recommended in Directive 2000/54/EC on the protection of workers from risks related to exposure to biological agents at work.

b. Ensuring the implementation of these recommendations at Member State level is critical for both HCW and patient safety

Implementation of existing recommendations remains limited in Europe. For instance regarding influenza, despite the existing recommendations by WHO⁶ and by some MSs to vaccinate Health Care Workers, their vaccination coverage remains low in most of the EU MSs⁷. Public authorities should ensure that existing recommendations are implemented in order to avoid the re-emergence of communicable diseases due to insufficient coverage of the European Workforce.

¹ Center for Disease Prevention and Control <http://www.cdc.gov/ncidod/dhqp/id.html>.

² Prüss-Üstün A, Rapiti E, Hutin Y. Sharps injuries: global burden of disease from sharps injuries to health-care workers WHO Environmental Burden of Disease Series, No 3: http://www.who.int/quantifying_ehimpacts/publications/en/sharps.pdf

³ OMS, Prevention of hospital-acquired infections A PRACTICAL GUIDE, Chapter VI, WHO/CDS/CSR/EPH/2002.12

⁴ OMS, Prevention of hospital-acquired infections A PRACTICAL GUIDE, Chapter VI, WHO/CDS/CSR/EPH/2002.12

⁵ OMS, Prevention of hospital-acquired infections A PRACTICAL GUIDE, Chapter X, WHO/CDS/CSR/EPH/2002.12

⁶ OMS, Prevention of hospital-acquired infections A PRACTICAL GUIDE, Chapter VI, WHO/CDS/CSR/EPH/2002.12

⁷ Prof Szucs presentation at ESWI Annual Influenza Conference in Vilamoura <http://www.evm-vaccines.org/pdfs/annex5.pdf>

Professional organizations should play a role in supporting MSs to ensure that Health Care Workers are vaccinated routinely to prevent, in particular, those infectious diseases that can result in serious nosocomial infections (e.g. seasonal flu or tuberculosis).

In addition, it is essential that health authorities consider extension of existing recommendations to new vaccines when there is significant potential to prevent and control emerging nosocomial infections.

2. Develop life-long learning to ensure periodic review of existing vaccine preventable diseases

EVM also agrees with the strategic attention for education and training for healthcare workers in the draft Green Paper. All doctors, nurses and other health professional staff will regularly be responsible for the diagnosis and care of patients with infectious diseases. They would be expected to understand the principles of diagnosis and treatment of infectious diseases, as well as to have detailed knowledge of the preventative approaches, including vaccination. They constitute an effective safeguard to assist in the implementation of public health control measures. However, in many Member States of the EU there is generally little pre-graduate education in the curriculum of Medical Schools about vaccines and vaccine preventable infectious diseases.

Several existing vaccines, such as those against influenza, pneumococcus, and pertussis are still grossly under-utilized among health care workers, despite widely accepted recommendations. This can, at least partly, be explained, by lack of appropriate understanding by healthcare professionals about the burden of disease, vaccine benefits and risks associated with their usage.

Relevant training should therefore be provided to help deepen knowledge of the importance of vaccination as a preventative measure amongst healthcare workers. Specifically this should ensure healthcare workers understand why they should get vaccinated themselves and why it is important for them to proactively identify 'at risk' populations that can benefit from vaccination.

Pre-graduate education at medical school but also life-long learning for all health care workers on vaccine-preventable diseases is essential not only in view of re-emerging communicable diseases and possible major health threats, such as pandemic influenza but to keep the health workforce up to date on new developments concerning vaccine preventable diseases. In recent years, a variety of new vaccines have been developed and are registered for the prevention of different diseases, such as human papillomavirus (HPV), rotavirus, pneumococcal conjugate, meningococcal conjugate, shingles, or Japanese encephalitis. New vaccines have and will become available for other population segments than children, for which vaccines are "known". Healthcare providers will need to require knowledge about these new vaccines and prevention strategies to understand and implement their optimal use for the respective target populations. Professional organizations and academic institutions could play a key role in coordinating and delivering these training programmes.

3. Ensure adequate training in the area of vaccination to build up the necessary public health capacity and capabilities required for major health threats

EVM supports the Green Paper's objective to build a high-quality Public Health Capacity, and in particular in view of responding to outbreaks of infectious diseases

and global pandemics. Given the key role that vaccination policies play in preventing and responding to outbreaks of infectious diseases, it is crucial that the European health workforce has a uniform level of preparedness in this area including:

- Relevant training to face unusual health threats from infectious communicable diseases, such as an influenza pandemic
- Relevant training and plan to face health threats of very large proportions, i.e. requiring the intervention of a large number of health professionals in a short period of time
- Relevant training to raise awareness on the use of pre-pandemic and pandemic vaccines in order to prepare the healthcare workforce to respond to major pandemic outbreaks.

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