

# ECDC Public consultation

## “Proposals for draft EU guidelines on the prudent use of antimicrobials in human medicine”

Please refer to the [guidelines for submission of comments](#) and the [privacy statement](#).

**Deadline for comments: Monday 5 September 2016 sent to [ARHAI@ecdc.europa.eu](mailto:ARHAI@ecdc.europa.eu).**

### Note:

- Incomplete contributions will not be accepted.
- Please note that you may be contacted by ECDC at the specified e-mail address if there is a need for follow up questions or clarification on your submission.

Please choose **one** of the following:

I am submitting the comments contained in this document on behalf of **myself**.

(All fields mandatory)

First Name	Surname	Country	E-mail address	Affiliation

### -OR-

I am submitting the comments contained in this document on behalf of **organisation**.

(All fields mandatory)

Organisation	Country	E-mail address
Council of European Dentists	Belgium	ced@cedentists.eu

## Comments on the document under public consultation:

Section of document (Introduction, Definitions, etc)	Page and line number	Comment and rationale	Proposed change
General comment	34	<p>The CED welcomes the expert consensus approach to the development of the draft EU Guidelines and in the large majority supports the general approach and the recommendations presented in each section. In particular, CED considers that it is, indeed, timely and appropriate to provide guidance on generic elements of good practice.</p> <p>The CED General Meeting has for some time unanimously agreed a resolution that supports best practice in prescribing and emphasises the responsibility of the dental profession in contributing to the reduction of AMR.</p>	
5. Prescribers	Page 5, 219	<p><i>"In the Community: (...) dentists should prescribe antimicrobials according to guidelines.</i></p> <p>The CED fully understands this principle and supports it as it stands but wishes to comment that there may be situations where a dentist may feel justified in prescribing outside the national guidelines. Guidelines are exactly that – guidelines and not legislative standards. Where a dentist, with fully informed and valid consent from the patient, prescribes outside the guidelines, the justification to do so should be properly recorded and justified.</p>	<p><i>....dentists should aim to prescribe antimicrobials according to guidelines. Where the dentist feels it appropriate to prescribe, or not prescribe, outside the guidelines, valid consent should be sought from the patient and justification for the decision fully documented and justified.</i></p>
5 Prescribers	Page 5 219-220  Page 2 90	<p><i>Antimicrobials should not be used as a substitute to dental operative intervention [40-42]"</i>.</p> <p>The CED fully supports this statement but wishes to add to it. General Medical Practitioners, who, in England and Wales see c.600,000 dental consultations per annum, not having the</p>	<p><i>Antibiotics should not be used by dentists or other healthcare professionals as a substitute to dental operative intervention.</i></p>

	<p>Page 6 281-287</p> <p>Page 2 92-94</p>	<p>knowledge or equipment to consider dental operative interventions, are more prone than General Dental Practitioners to use antibiotics as a substitute.</p> <p>The dentist's ability to fulfil this imperative will be significant aided by public health education and proper funding of public dental services. The CED feels that these issues are partly addressed in Section 2k and Section 10 in relation to public attitudes and behaviours.</p> <p>Section 2l. refers to incentive schemes for appropriate prescribing and Section 2s refers to system change approaches. It would be helpful if these are interpreted to encompass an acknowledgment that dentists require time to make a proper diagnosis and to carry out time consuming clinical interventions.</p>	<p>Add to Section 2 <i>Ensure that proper funding policies are established for the provision of dental unscheduled clinical interventions for the management of dental infections.</i></p>
Education/academics	<p>Page 6 274</p>	<p><i>... "require participation in a minimum number of certified education activities on antimicrobial prescribing and use"</i></p> <p>It should be expected that regulated professional clinicians are reflective practitioners and will plan their training and education in the light of their regular reflection of their learning needs. All postgraduate clinicians should work to a Personal Development Plan that should be a strategic, dynamic and responsive document that should direct the timing of and required number of all education and training activities. Far more important is to ensure that learning opportunities in relation to antimicrobial prescribing are readily accessible, high quality, relevant and frequently presented.</p>	<p><i>...recommend participation in a minimum number of certified education activities on antimicrobial prescribing and use ensuring that such opportunities are high quality, relevant, readily accessible and frequently presented</i></p>