

Proposals for improving the Draft 1 of the Founding document of the Independent Panel on Evidence for action against Antimicrobial Resistance (IPEA)

We, the undersigned organizations and individuals, have closely followed the steps in the development of the IPEA. On the 11th of November, 2025, a Draft 1 on the founding document for the IPEA and several accompanying procedural documents were published for consultation with UN Member states.

In comparison with the Draft Zero, significant changes have been made, most notably the decision body of the panel which is now entirely composed of the Expert Committee with its 30 members. This is a clear step towards an expert-led independent panel.

However, the current proposed structure of the IPEA is not sufficient to deliver on its aim. At its core a global evidence panel should be a resource for the research community and policymakers alike to identify how the international community can improve human health and save lives, which requires policymakers to prioritize AMR alongside other competing challenges. It should create a research and evidence hub for comprehensive analysis of global AMR evidence that supports member states in their decision making and action.

We see several key considerations that need to be embedded in the structure of the IPEA in order for it to deliver on this aim. These include:

1. Member states need a clear mode of engagement with the IPEA to ensure the panel's outputs and recommendations are relevant to national and regional settings. Whilst it is critical that the analysis and synthesis conducted by the panel remains independent from political influence, it is also imperative that all member states see the panel as relevant, with its deliberations grounded in their needs. It is also important that the panel engages with existing AMR global governance functions, including the biennial ministerial meetings and the Global Leaders Group, to facilitate a coordinated global response. This will be crucial to ensuring that the panel's outputs are used for sustained policy development and prioritization.
2. Equally, the independence of the Expert Committee is key to ensuring the deliverables of the panel are distinct from any political or commercial considerations, and the qualifications of the Committee's members should be focused on technical and scientific expertise, not political affiliation.
3. The purpose and function of the various bodies need to be explicitly outlined to ensure roles and responsibilities are clear. In particular, the direction and prioritization of the IPEA's activity should be driven by the Expert Committee as the decision-making body, with the role of the secretariat clearly defined in the founding documents. Equally the form, function and purpose of the *ad hoc* Expert Groups need to be clearly stated within the founding documents.

This document provides a summary of these concerns, as well as comments on the supplementary documents (Rules of Procedure, Conflicts-of-Interests, and Process for Determining the Work Programme). The numbers below refer to the respective point in the Draft 1 of the Founding document.

I. Scope, objective and functions of the Panel

We believe that the suggested four functions of the panel (a-d) are insufficient to describe the core function and output from the panel. It should be spelled out in the introduction of this section that the core objective of the panel is to provide evidence and that the main outputs are synthesized

evidence in periodic reports to relevant stakeholders that will enable, facilitate and accelerate implementation.

II. Institutional arrangements

A. Expert Committee

Membership

It is essential that the panel has a broad composition of members, with proven knowledge, strategic skills and experience in areas relevant to antimicrobial resistance not only including experts from human health, animal health, and environment. Thus, we suggest that “other relevant fields” should be changed to “as well as social sciences including economics, behavioral sciences, political sciences, anthropology, bioethics, lawyers, experts in innovation, and other relevant fields”.

The principal qualifications are technical and scientific expertise in the above-mentioned fields. Complementing this, panel members should have experience across the science-policy and policy-practice interface, including research dissemination.

Furthermore, membership in both the Expert Committee and *ad hoc* groups must follow clear principles of merit and equity to safeguard the representation of works by underrepresented groups and promote inclusivity. We suggest the current text (under Membership, para 4) be amended to “The selection process should ensure equitable representation across geography, sectors, gender, and disciplines, including representation of Indigenous Peoples, from regions severely affected by AMR (including low- and middle-income countries)”.

There are major inconsistencies in describing the membership of the Expert Committee between the founding document and the document describing Rule of Procedures. In the latter, Rule 8 withholds that the first requested qualification (a) is professional and political experience such as “a serving [...] government official, or a serving [...] manager the private sector”. We strongly advise removing this from the text, as it would imply significant tensions in the choice of which governments or private sector companies that would be represented but not the least would jeopardize the independence of the panel. We suggest that the section that describes Membership in Rule 8 starts with (b) and that the text is amended according to our proposal above (first para under Membership).

Given the leadership role of the Co-Chairs and Vice-Co-Chairs, who are “responsible for ensuring the effective execution of the Committee’s functions”, it is crucial that these actors have necessary skills in management and leadership, alongside their strong scientific expertise. It is also crucial that the Co-Chairs and Vice-Co-Chair, if possible, should provide balanced representation between high, middle and low-income countries, and according to gender.

Along the same lines, the Co-Chairs and Vice-Co-Chair need more description. First, the procedures for which these actors will be recruited and to whom they will be accountable must be stated. Second, their full role must be described. Currently, its main role is to facilitate meetings and consult the Secretariat, but the Co-Chairs and Vice-Co-Chair must play a leadership role steering the strategic direction of the Panel. Additional responsibilities must be spelled out to ensure that the Panel and Chairs are able to exercise independent judgment and leadership.

Functions

The description of the functions of the panel does not provide a clear picture of the workflow and division of tasks leading to the main deliverables, i.e. periodic scientific reports. Given the rapidly

growing and extensive literature on AMR—with more than 25,000 publications per year even if we exclude ‘grey literature’ and local evidence—the power horses of the panel will be the “ad hoc expert groups”. They must receive a much more prominent place in the Panel’s work.

A mechanism for the internal governance of the Panel is now lacking, i.e., the Panel is currently self-governing (7j and 7k). The Chairs, in particular, should be granted sufficient discretion to set the operative course of action, with the Secretariat providing practical support to enable such leadership. The overall objectives of the work should, however, be determined collectively by the Expert Committee.

The Secretariat should review progress in the implementation of the work programme, monitor the management of resources, and support coordination with Member States and the overarching global AMR governance framework—without intervening in the scientific content of the Panel’s work.

B. Subsidiary groups

Rules of Procedure (rule 16, §6) states that the “procedures for the preparation and clearance of deliverables by *ad hoc* expert working groups are further defined in a separate procedural document, including the nomination and selection of experts by the Expert Committee.” This supplementary information is not, to our knowledge, included.

The Notes by the Quadripartite Joint Secretariat on AMR accompanying the Draft 1 of the Founding document withholds (point 4) that “Subsidiary groups such as *ad hoc* expert groups, supported by the Secretariat, implement the Panel’s work programme”. Still, the procedural underpinnings for this vast implementing function are largely neglected, particularly in the Rules of Procedure.

A good description of the role of such thematic expert groups can be found in the “[Rules and Procedures for the Work of the High Level Panel of Experts on Food Security and Nutrition](#)” (Agreed by the CFS Bureau on January 27th, 2010).

As the Expert Committee is the decision-making body of the panel, it should be stated that it has the power to prioritize reports that should be produced, and which *ad hoc* groups that must be composed to fulfil the task.

Each subsidiary group is currently expected to elect its own officers such as co-chairs and rapporteurs. This must be complemented with a risk analysis and mitigation strategy to ensure such crucial groups remain effective and legitimate.

C. Secretariat

The role of the Secretariat must be clarified. For instance, in the Process for Determining the Work Programme, §6, it says that “The Secretariat, in consultation with the Co-Chairs and Vice Co-Chairs of the Expert Committee, will consider and prioritize the requests, submissions and inputs, and prepare a draft work programme for approval by the Expert Committee. We assume this should be reversed, i.e. the Expert Committee—in consultation with the Secretariat—otherwise there will be institutionalized power for the Secretariat to prioritize.

We note that the Secretariat should facilitate the Expert Committee’s decision-making authority, strategic direction, and the effective management of its resources. It should also play a central role in communication with Member States, for example by supporting annual discussions at the World Health Assembly, bi-annual High-Level Ministerial meetings on AMR, and other relevant convenings where Member States address AMR-related issues. It should also engage with existing

AMR global governance functions, such as the Global Leaders Group on AMR, ensuring there is no duplication of activity.

III. Financial arrangements

We support the financial arrangements outlined in the Founding Document but would welcome a clearer description on how it will be sustainably maintained.

IV. Partnerships

Under Partnerships, we welcome the commitment to include civil society, academia and others as observers to the panel. Equally, the list of potential types of entities has been expanded and specified and does now include the private sector. It must be ensured that the partnerships cannot dictate the direction or prioritization of the panel and that the expert committee will have the final say. Although these entities would be obliged to abide by the Conflict-of-Interests policy, paragraph 21 limits the disclosure of information related to commercial interests, which opens up for interpretation. To ensure the independence of the panel, it would be important to understand what this type of partnership would aim to do and with what purpose.

The Panel should draw on private-sector members where they provide unique scientific expertise not readily available elsewhere, such as researchers in pharmaceutical companies, but we recommend excluding private-sector individuals whose primary roles concern policy, lobbying, management, or other executive functions.

V. Evaluation of the effectiveness of IPEA

Evaluation is crucial for the Panel's accountability, long-term effectiveness, and governance. As such, evaluation should be designed to assess the scientific quality of outputs (periodic reports) but also to strengthen the institutional processes that enable effective action and decision-making.

Periodic evaluations should examine how well the Panel's governance arrangements—including the modus operandi with Co-Chairs and Vice-Co-Chairs, as well as the leadership dynamics within *ad hoc* expert groups. This entails evaluating agenda-setting, transparency mechanisms, participation across sectors and regions, conflict-of-interest safeguards, and the coherence of decisions within and between the Expert Committee, Secretariat, and subsidiary groups.

Evaluation can also reinforce accountability to Member States by assigning the authority to the proposed Member State-elected governance body (see Functions above). This will help institutionalize evaluation as a core accountability mechanism and reinforce Member State ownership of the Panel's performance and long-term effectiveness.

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