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2	Making waves: How does the emergence of antimicrobial resistance affect
3	policymaking?
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9	
10	Abstract
11	This article considers current trends in antimicrobial resistance (AMR) research and
12	knowledge gaps relevant to policymaking in the water sector. Specifically, biological
13	indicators of AMR (antibiotic-resistant bacteria and their resistance genes) and detection
14	methods that have been used so far are identified and discussed, as well as the problems
15	with and solutions to the collection of AMR data, sewage surveillance lessons from the
16	COVID-19 pandemic, and the financial burden caused by AMR, which could be
17	synergically used to improve advocacy on AMR issues in the water sector. Finally, this
18	article proposes solutions to overcoming existing hurdles and shortening the time it will
19	take to have an impact on policymaking and regulation in the sector.

21 Keywords

AMR surveillance, microbial indicators, precautionary approach, regulation, water sector

24 **1. Introduction**

25 Antimicrobials and, specifically, antibiotics have become one of the main pillars of 26 modern medicine, saving millions of lives since they were first introduced in the 1940s. 27 Antibiotics are essential in treating bacterial infections in both humans and animals, but 28 the emergence of antimicrobial resistance (AMR) has limited their effectiveness (Nathan, 29 2020). As a result, governments, industry, and scientists are adamant the AMR crisis is 30 one of the most pressing global threats. Several initiatives are in place to deal with this, 31 mainly in clinical and environmental settings. In clinical settings, the focus has been on 32 surveillance, reducing the use of existing drugs, establishing incentives for the discovery 33 and production of new antibiotics, implementing global guidelines, and, when possible, 34 local regulations. In environmental settings, the focus has predominantly been on research 35 initiatives to monitor the presence and impact of antibiotics, decreasing antimicrobial 36 therapy in agriculture and livestock, determining minimal acceptable thresholds for 37 antibiotics in treated effluents, and exploring the potential role of wastewater treatment 38 to reduce antibiotics and AMR determinants in treated water (Hong et al., 2018; Stanton 39 et al., 2020; Murray et al., 2021). However, the ability to monitor how AMR spreads from 40 the environment to clinical settings is limited (Hofer, 2019) due to the lack of a single or 41 set of universal biological indicators that can establish the rate of AMR spread in 42 environmental settings and their potential risk to human health. The only short-term 43 solution repeatedly recommended is the precautionary approach (Manaia, 2017).

In this article the precautionary principle has been expanded with the following objectives: (i) exploring how AMR surveillance has been implemented and data has been generated in both clinical and water/environmental settings; (ii) discussing how biological indicators related to AMR have been used in pilot surveillance efforts and how data has been generated and shared; (iii) reflecting on sewage surveillance lessons from the 49 COVID-19 pandemic and how this could help better manage AMR in water; and (iv) 50 commenting on the financial burden of AMR and how this could be used to drive change 51 in policymaking. The aim of this article is therefore to highlight current knowledge gaps, 52 anticipate future trends, and suggest actionable insights to advance AMR regulation in 53 the water sector.

54

55 **2.** AMR in the water sector

56 Antimicrobial resistance is complex to define and quantify. Broadly speaking, AMR is 57 an intrinsic or acquired ability of microorganisms to resist an antimicrobial. In the latter 58 case, they can acquire resistance to antimicrobials by either genetic mutation or by 59 accepting AMR genes from other bacteria. In fact, AMR genes are considered as 60 environmental pollutants if anthropogenic disturbances increase their prevalence above 61 the usually occurring background levels (Martinez, 2009). Moreover, bacteria associated 62 with hospital acquired infections and their ability to resist antibiotic treatment are under 63 the spotlight in the AMR crisis (Chandler, 2019). AMR extends not only to antibiotics 64 but to a number of chemical classes, including heavy metals and disinfectants/biocides 65 (Singer et al., 2016).

The accepted framework for dealing with AMR is the "One Health" approach. Fundamental to this is interdisciplinary collaboration and communication on health in the human, animal, and environmental sectors. Areas of action include monitoring targets known to decrease infectious risk, such as improving sanitation, providing access to clean water, improving medical care, tackling environmental pollution, and managing the overuse of antimicrobials in both human healthcare and animal husbandry (Essack, 2018; Jovanovic et al., 2021).

73 As water bodies frequently receive treated and untreated wastewater effluents and 74 anthropogenic pollution, water is an ideal environment for the acquisition and spread of 75 AMR. In fact, this impact can be exacerbated in developing countries where the presence 76 of wastewater treatment is limited or even absent (Pandit and Kumar, 2015; Pandey et al., 77 2021). Consequently, the "One Water" approach has been suggested to complement the 78 One Health framework in order to monitor and manage AMR in the water sector. The 79 One Water approach proposes that drinking and wastewater are interconnected and need 80 to be managed holistically. Both the One Health and the One Water frameworks guide us 81 to holistically manage wicked problems – such as global water supply, climate change, 82 and the AMR crisis – while considering the environment, and human and animal health 83 (Shafer and Fox, 2016; Hong et al., 2018). Moreover, considering that the United Nations 84 Sustainable Development Goals (SDGs) will be the point of reference for any strategy or 85 policy towards a more sustainable future, those goals relating to water and sanitation 86 should be taken into account in formulating effective policies. The SDGs include eight 87 targets that address drinking water, sanitation and hygiene services, wastewater treatment, 88 water quality, water use, water management, transboundary cooperation, water-related 89 ecosystems, official development assistance and participation of local communities 90 (WHO-UNICEF, 2021).

91

92 **3. Surveillance as a tool for AMR containment**

93 AMR cannot be eradicated either in clinical or environmental settings. The containment 94 of AMR, however, is possible (Jovanovic et al., 2021), and to achieve this the World 95 Health Organization (WHO) has highlighted that surveillance of AMR is essential. Data 96 acquired through surveillance can be used to monitor the development and spread of 97 AMR, and also to measure the impact of strategies and interventions to mitigate it (Smith 98 and Coast, 2002). Although the consensus that resistance development, rather than just 99 transmission, exists in environmental settings and is vital to AMR containment, this 100 precautionary topic has been extremely difficult to advocate and gain the attention of 101 policymakers (Wellcome Trust, 2020). In order to address this, several AMR databases 102 and data collection initiatives have been revisited to better connect the resulting data, 103 thereby generating new insights and influencing policymaking.

104

105 4. Databases generated on AMR surveillance

106 The major surveillance programs targeting AMR at global scale have placed emphasis on 107 monitoring of clinically relevant pathogens (such initiatives are listed below). 108 Surveillance of AMR emergence and spread in water/environmental settings has been 109 more consistently done in research at local level (Rodriguez-Mozaz et al., 2015; Majeed 110 et al., 2021), regional/continental monitoring campaigns (Cacace et al., 2019; Pärnänen 111 et al., 2019) or selected countries at global scale (Hendriksen et al., 2019), targeting 112 particular antimicrobial resistance 'hotspots', such as wastewater treatment plants 113 (Lekunberri et al., 2017), contaminated watersheds (Koczura et al., 2016), 114 soil/agricultural land (Singer et al., 2016), and seawater ecosystems (Blanco-Picazo et al., 115 2020). Moreover, there is insufficient or no information from other countries or regions, 116 especially from low-income and middle-income countries where the AMR surveillance 117 in water is limited.

The global open-access triple antimicrobial resistance database led by the WHO, the Food and Agriculture Administration (FAO) and the World Organisation for Animal Health (OIE) provides access to information on the status of countries' implementation of the global action plan and actions to address antimicrobial resistance across all sectors. Data collection here is based on a country self-assessment questionnaire, the *Global Database* 123 for the Tripartite Antimicrobial Resistance AMR Country Self-assessment Survey 124 (TrACSS) (https://amrcountryprogress.org/). A second database of interest is the Global 125 Surveillance Antimicrobial Resistance System (GLASS) 126 (https://www.who.int/glass/en/), which focuses on eight target pathogens detected in four 127 human specimen types (blood, urine. stool, and genital swabs) 128 (https://www.who.int/glass/en/). A third initiative, led by the US based Centre for Disease 129 Dynamics, Economics & Policy (CDDEP), put together a resistance map using data 130 collected from North America, more than 30 European countries, and several low and 131 medium-income countries (https://resistancemap.cddep.org/). This database monitors 132 resistance of principal pathogens versus various classes of antibiotics. Others include the 133 US Centers for Disease Control (CDC), which has its own database 134 (https://arpsp.cdc.gov/profile/geography) that maps various statistics on pathogens per 135 US state; and the European Centre for Disease Prevention and Control (ECDC), which 136 "surveillance atlas" country-by-country has а basis on а 137 (https://www.ecdc.europa.eu/en/antimicrobial-resistance/surveillance-and-disease-

data/data-ecdc). The most recent input date in the atlas is 2019. The ECDC is also focused
on producing surveillance reports for the continent. The Sweden based Joint
Programming Initiative on Antimicrobial Resistance (JPIAMR) – an international
collaborative platform engaging 28 nations and the European Commission to curb
antimicrobial resistance (AMR) – has various funding and project consortium initiatives
to fund AMR research globally and has gathered a collection of multipurpose databases
(https://www.jpiamr.eu/).

145 The recently formed Global AMR R&D Hub is a knowledge center focused on 146 monitoring R&D and investment initiatives to address challenges and improve 147 coordination and collaboration in global AMR research development using the One Health approach. It is a partnership of countries, non-governmental, and
intergovernmental organizations (https://globalamrhub.org/). Other organizations include
PAR, The Foundation to Prevent Antibiotic Resistance (https://parfoundation.org/); the
industry consultancy-led AMR Insights (https://www.amr-insights.eu/); and the STARIDAZ International Consortium on Animal Health (https://www.star-idaz.net/).

153 These various initiatives are encouraging; however, in order to fully extract and utilize 154 the value and meaning of their data, these databases need to be harmonized so that trends 155 can be truly observed, actions be taken, and overarching environmental AMR regulations 156 implemented (Aarestrup and Koopmans, 2016; WHO, 2015). Recently, it has been 157 suggested that data technologies, such as blockchain, IoT (Internet of Things) and others, 158 may help to achieve better management and use of AMR data globally (https://www.amr-159 insights.eu/). For that to occur, however, legal barriers impeding data sharing between 160 countries and organizations will need to be tackled at governmental levels.

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162 5. How far advanced are biological indicators for AMR in water?

163 For implementing impactful surveillance of AMR in environmental settings, a standard 164 methodology should be selected, as well as a set of relevant biological indicators, to be 165 able to establish an economically feasible and long-term sustainable monitoring regime. 166 Although standard culture-based methods used to evaluate microbial safety of drinking 167 water and wastewater have provided valuable information (Marano et al., 2020), these 168 methods have limited applicability in AMR surveillance and are biased towards cultivable 169 organisms. AMR is mostly related to microorganisms harboring antibiotic resistance 170 genes (ARGs), for which the detection depends almost exclusively on molecular methods 171 (Gao and Sui, 2020).

172 Cutting-edge genomics (e.g., microarray technology) and metagenomics have been 173 proposed as a possible next step to achieve global monitoring of AMR in 174 water/environmental settings (Duarte et al., 2020; Hendriksen et al., 2019; Hong et al., 175 2018). They have been successfully used in sewage surveillance and have proven to be flexible, scalable, relatively easy to implement and standardize - features that could 176 177 potentially benefit also their application in low and medium-income countries (MacLean 178 and San Millan, 2019). However, these methods are not exempt from disadvantages and 179 limitations, such as how the complexity in sequence assembly and/or functional genes of 180 one microorganism cannot be fully linked to its phylogeny (Forbes et al., 2017; Cheng et 181 al., 2019). The joint use of standard culture-based methods and cutting-edge genomics 182 can therefore overcome these limitations. Trends observed using these methods need to 183 be correlated with observations in clinical settings so that insightful correlations can be 184 established between the emergence of antibiotic-resistant pathogens and ARGs 185 encountered in the environment.

186 Such evidence is essential to persuade both the public and policymakers of the urgent 187 need to act on AMR (Jovanovic et al., 2021). Specific examples that establish how the 188 spread of ARGs occurred from water/environmental sources to impact on clinical settings 189 are starting to emerge. These include the mobility of *bla*_{CTX-M} (gene encoding resistance 190 for β-lactamases responsible for inactivating third generation cephalosporins) (Cantón, 191 2009; Jovanovic et al., 2021), mcr-1 (resistance to colistin or polymyxins), bla_{NDM-1} 192 (resistance to a large range of β -lactamases, including carbapenems) (Jovanovic et al., 193 2021). The risk of the spread of ARGs from antibiotic-resistant bacteria to final 194 consumers has recently been established in animal farming settings (Van Gompel et al., 195 2020).

196 Recommended approaches to determine biological indicators for AMR surveillance in 197 water include monitoring resistance in: (i) microorganisms watched by official lists 198 (WHO, UNESP, USCDC, ECDC, etc.) (Jovanovic et al., 2021); (ii) faecal and other 199 benchmark microbial indicators (such as bacteriophages) routinely monitored in drinking 200 and wastewater facilities (Larsson et al., 2018); (iii) clinical relevant antibiotic-resistant 201 bacteria; and (iv) the general presence of ARGs in the target water setting, also known as 202 evaluation of the environmental 'resistome'.

203 While the correlations between the presence of these AMR 'precautionary microbial 204 indicators' and the risk they may pose of migrating from water to a clinical setting are 205 established, the precautionary approach can further inform improving water safety. In 206 established high risk environments for AMR spread, such as effluents of hospital and 207 antibiotic production facilities, wastewater treatment facilities need to be upgraded to 208 reduce pollution and to more effectively remove not only antibiotics and antimicrobials 209 but also AMR indicators such as resistant bacteria and ARGs (Hong et al., 2018). These 210 changes, however, are only likely to occur with enforcement of stronger water 211 regulations. Compliance here will depend upon the development and availability of fit-212 for-purpose and economically viable water treatment technologies (de Almeida Kumlien 213 et al., 2021). An important case-study to help advance AMR regulations in water can be 214 drawn from the latest pandemic, our views on which are discussed below.

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216 6. Lessons from the COVID-19 pandemic

The COVID-19 pandemic has quickly advanced our knowledge and practice of sewage surveillance and epidemiology of SARS-CoV-2 studies in water, which has extensively benefited from wastewater-based epidemiology. This latter is a relatively new approach that has the potential to provide comprehensive health information using communityderived wastewater (Sims and Kasprzyk-Hordern, 2020). In fact, the European Commission has recently proposed recommendations for a common approach to establish a systematic surveillance of SARS-CoV-2 and its variants in wastewaters in the EU (European Commission, 2021), which would undoubtedly help to identify health-related relevant parameters to be regularly monitored in wastewaters. These initiatives represent an opportunity to implement their recommendations and advance AMR surveillance (Wilson et al., 2020).

228 Even though a conclusive quantitative microbial risk assessment (QMRA) to influence 229 policymaking on AMR in water is needed given the threat AMR poses to public health, 230 the case for using the precautionary approach should be considered, particularly when 231 data is still not conclusive. Risks that cannot be calculated can be predicted, or at least 232 estimated, by deploying data analytics, scientific leadership, and knowledge and, within 233 local financial and technical limits, be corroborated on a pilot scale through multinational 234 projects. This, however, needs to happen through parallel taskforces that also focus on 235 driving changes in current water legislation.

236 Established networks and projects rapidly pivoted during the years 2020 and 2021, such 237 as the Dutch led 'Sewers for COVID' (https://devpost.com/software/sewers4covid) and 238 the Spanish 'SARSAIGUA' (https://sarsaigua.icra.cat/), and can be aligned with existing 239 AMR surveillance initiatives to speed up AMR surveillance and containment in the 240 environment (Singer et al., 2016). Using the precautionary approach, existing strategies 241 to determine AMR precautionary indicators, even though not definitive, could be used to 242 pilot more significant AMR surveillance schemes in water. One concrete way to drive 243 that change is to add such indicators to watchlists and, with more aggressive advocacy by 244 the right actors, to water regulations. Here, the ideal target monitoring sites would be

hospital and antibiotic facilities wastewaters, potentially regulated through changes in
overarching and enforcing law, such as the Water Framework Directive in Europe.

247 The question that should be asked at this point is: how can actionable insights be created 248 to influence policymaking with the data available now? For a vital issue such as AMR, 249 advocacy on the theme is both relevant and recommended. The important action is to 250 determine who are the actors at community, research, policymaking, and water utility 251 levels that need to be involved, both in arguing for the AMR cause and in driving change. 252 A way to bring these actor together is through smart specialization clusters, a 253 collaboration strategy mediated by governmental funding schemes, well known to speed 254 up innovation in the water sector (de Almeida Kumlien et al., 2019, 2018). Figure 1 255 illustrates a systematic process to develop policies that can address public health problems 256 such as AMR.

257

258 7. Driving change in policymaking of AMR in water

259 Similarly to the dispersion of data collected in various AMR surveillance efforts, the 260 current and future costs of the AMR crisis to countries are still only estimates. Apart from 261 realizing robust QMRA data, a fundamental factor to drive change in AMR policymaking 262 in water is by clearly demonstrating the financial losses caused by this crisis (Roope et 263 al., 2019). Although data here is still approximate, estimates show a difficult scenario on 264 the horizon for global economies. Recent estimates put the AMR cost globally at US\$100 265 trillion through loss of productivity. In the USA, (data from 2019) more than 2.8 million 266 multidrug-resistant bacterial infections occur annually, with an estimated 35,000 deaths 267 and a US\$20 billion health-care burden (Strathdee et al., 2020). In Europe, the annual 268 economic cost associated with the treatment of antibiotic-resistant infections has been 269 estimated to be around €1500 million. This figure includes the economic impact associated with the number of days of lost productivity, estimated to be approximately
€450 million each year (Roca et al., 2015). AMR affects national budgets, mortality, and
related disability-adjusted life-years (DALYs). In the EU and European Economic Area
(EEA) its impact has been comparable to the combined effects of tuberculosis, influenza,
and HIV (Cassini et al., 2019).

275 Progress has been made in establishing methodologies to determine AMR costs. A 276 comprehensive framework for categorization of AMR costs, which evaluates human, 277 animal, and environmental factors, and its effects up through societal levels is "The 278 Global Antimicrobial Resistance Platform for ONE-Burden Estimates (GAP-ON \in)". This 279 initiative, funded under the JPIAMR, considers local direct and indirect epidemiological 280 costs and data, and is adaptable for a broad range of etiological pathogens and geographic 281 locations (Morel et al., 2020).

282 Recommendations by the WHO, or, in the absence of a central government that regulates 283 AMR stewardship, by other organizations which act locally, have shown slow progress. 284 Currently, only 5% of countries have a multisectoral AMR action plan that has been 285 implemented with identified funding sources and monitoring processes in place (O'Neill, 286 2016). Compliance, even when it is attained in some countries, might not be possible to 287 achieve due to lack of financial and human resources (Chandler, 2019; Roope et al., 288 2019). The cost of implementing AMR governance is considerable, and most likely 289 unaffordable for developing nations. The cost of remediating the AMR crisis, however, 290 will be much higher.

The WHO has recently highlighted the need to develop new AMR regulations with global reach (Hoffman et al., 2015). This could be achieved by revising the International Health Regulations (IHR), developing a new treaty on pandemics, or a separate agreement on

AMR. Regardless of the path of action chosen, we need to seize chances to achieve newregulations for AMR now.

296 Given this, scientific leadership is essential to advise policymakers on which are the best 297 control points and methodologies for implementing regulation of AMR in the water 298 sector. Among them, the following should be taken into consideration: (i) precautionary 299 indicators to achieve more effective surveillance of AMR in water/environmental 300 settings; (ii) harmonization and better accessibility of methodologies to detect AMR and 301 data generated; (iii) reflecting on lessons learnt from the pandemics, especially regarding 302 sewage surveillance schemes; and (iv) making the case on the financial impact of the AMR crisis. 303

These points need to be advocated, aligned, and incorporated in a centralized enforcing AMR regulation, pivoted by the right leadership (being at WHO or UN level), and only achievable with stronger collaboration between AMR stakeholders, at community/country, research, industry, water utility and policymaking levels.

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309 8. Conclusions

- Polluted aquatic environments (e.g., wastewaters) present a potentially high risk
 of the spread of AMR affecting public health and thus should be carefully
 monitored.
- Scientific leadership needs to work with policymakers to advocate for immediate
 water regulation based on precautionary microbial indicators and methodologies
 to detect and evaluate the potential impact of AMR on human health.
- Harmonization of detection methodologies and indicators through the combined
 participation of research institutions worldwide is crucial to reach these goals.

- The generation of new data, improvements in existing data communication,
 accessibility, and harmonization between global AMR databases will help
 generate insights into the impact of AMR from the water environment on human
 health.
- Lessons on sewage surveillance learnt from the COVID-19 pandemic and the
 estimated financial impact of the AMR crisis can help drive better advocacy for
 new regulations in water.
- 325

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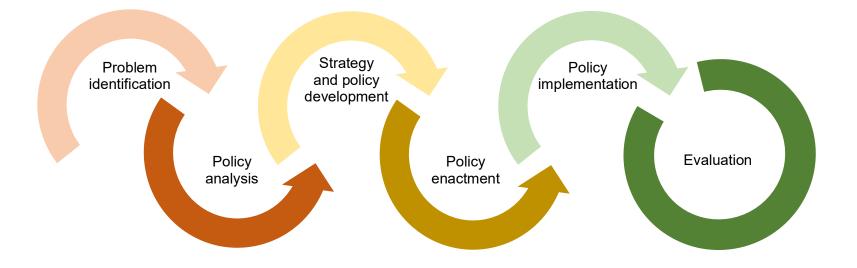


Figure 1. A proposed framework to identify the different actions and steps in the policy process. This figure has been adapted from the CDC's Policy Analytical Framework (https://www.cdc.gov/).