



Emily O'Reilly  
European Ombudsman  
1, Avenue du President Robert  
Schuman CS 30403  
F – 67001 Strasbourg Cedex  
eo@ombudsman.europa.eu

Stockholm, 26 July 2021

Our ref: DIR-2021-OUT-3277-AAMaSa  
Your ref: Strategic inquiry  
OI/3/2020/TE

**Re: Decision of the European Ombudsman in the inquiry on how the European Centre for Disease Prevention and Control gathered and communicated information during the COVID-19 crisis**

Dear Ms O'Reilly,

Thank you for the letter of 05 February 2021, regarding your Decision in the Strategic inquiry OI/3/2020/TE on how the European Centre for Disease Prevention and Control (ECDC) gathered and communicated information during the COVID-19 crisis.

ECDC has carefully reviewed the report and taken into consideration the proposed recommendations for improvements. With this letter and the enclosed document ECDC is informing the European Ombudsman of the actions taken in relation to the mentioned suggestions, following the discussion with the ECDC Management Board in June 2021.

Naturally, ECDC remains at your disposal for any further information you may require.

Yours sincerely,

Signed on behalf of  
Andrea Ammon,  
Director

Encl.: *ECDC response to the European Ombudsman report and recommendations*

## ECDC reply to the European Ombudsman report and recommendations on how the ECDC gathered and communicated information during the COVID-19 crisis

On 23 July 2020, the Ombudsman opened a strategic (own initiative) inquiry, with a view to providing an independent assessment of ECDC's information-gathering capacity and how transparently ECDC communicated that information to the public. The Ombudsman's findings are intended to feed into the ongoing discussion on strengthening the role of ECDC in a possible future European Health Union.

As a result of this inquiry, the Ombudsman issued six suggestions for improvements that aim to facilitate greater transparency of ECDC work. With this document ECDC is informing the Ombudsman of actions taken in relation to the suggestions for improvements. These actions have been discussed with the ECDC Management Board in June 2021, and in that context the Management Board requested at its meeting on 16 June 2021, that the planned ECDC actions for the Ombudsman's recommendation No 5 would remain general, as ECDC communication to the general public is one of the topics still under discussion in the Council as part of the amended ECDC Founding Regulation (Article 12).

## ECDC replies to the Ombudsman's recommendations

Suggestion	Recommendation	ECDC Reply
<p>1. Enhance the transparency of the evolution of ECDC's risk assessments, such as by highlighting where elements or guidelines were updated after new scientific evidence became available</p>	<p><i>The ECDC should indicate consistently in its risk assessments when it changes its advice based on new scientific evidence becoming available, in order to enhance transparency of how its scientific assessment evolves.</i></p>	<p>On updated RRAs and any technical reports ECDC will indicate on which new evidence basis the assessment of the risk has changed.</p> <p>When a new update of a previously prepared RRA is being discussed and the risk questions are being chosen, ECDC pays attention in keeping the same risk questions of the previous RRA, so to help spot when the level of risk has changed.</p>
<p>2. Publish the results of its surveys on specific issues to the greatest extent possible.</p>	<p><i>The ECDC should, on the basis of a publication policy, seek to publish the results of surveys, ensuring the highest standards of transparency and taking into account the public's legitimate interest in these results, in particular during a public health emergency.</i></p>	<p>ECDC regularly publishes the results of surveys that it undertakes, with examples such as the EULabCap survey of laboratory capacity and surveys of progress of Member States towards achievement of Sustainable Development Goals for HIV. The ECDC Communication policy, foreseen in the end of 2021, will provide the main elements guiding the publication practice in ECDC including surveys and other ECDC outputs.</p>
<p>3. Improve the transparency of the data in TESSy by creating an archive on its website, which contains all weekly overviews on TESSy data and indicates where the data may not be complete (for example from which Member States).</p>	<p><i>The ECDC should create an archive on its website, which contains all weekly overviews on whether the data in TESSy is complete, facilitating scrutiny of that data. In order to provide greater clarity, the ECDC should include in its risk assessments a reference to where on its website this information is available.</i></p>	<p>The appraisal of the evidence is covered in our <a href="#">RRA methodology</a> [page 5, section "Stage 4: Appraising evidence"]. ECDC will ensure that in new RRAs the evidence is appropriately explained in a transparent way with the needed references.</p> <p>ECDC has created an archive, which is available <a href="#">here</a>. The page contains ECDC <a href="#">Country overview</a> and <a href="#">Surveillance reports</a> published since 10 July 2020. The archive for historical Council map data is available as from May 2021 and it contains all produced Council maps (from week 46 2020). <a href="https://www.ecdc.europa.eu/en/publications-data/archive-data-maps-support-council-recommendation-coordinated-approach-travel">https://www.ecdc.europa.eu/en/publications-data/archive-data-maps-support-council-recommendation-coordinated-approach-travel</a></p>

<p>4. Examine if and to what extent exchanges between the ECDC and international partners – such as the WHO and the Chinese CDC - could be made public, in order to allow for greater scrutiny.</p>	<p><i>The ECDC should examine whether and, if so, to what extent and when exchanges it has with international partners could be made public, in order to allow greater public scrutiny of whether the information in these exchanges is timely, complete and of the necessary quality.</i></p>	<p>The COVID-19 pandemic has shown the importance of strong international cooperation and coordination with partners, in particular with the WHO and other Centres for Diseases Prevention and Control, CDCs.</p> <p>Throughout the pandemic, collaboration between ECDC and WHO Europe has become even more robust and adaptive to the rapidly changing situation. This included regular and intense contacts at various organisational levels, from operations to Directors.</p> <p>ECDC had already, in 2019, established an informal Network of other CDCs, such as the US, China, Canada, Israel, the Caribbean, and Africa CDCs, and have intensified the exchange since the onset of the COVID-19 pandemic with other CDCs, such as Singapore, South Korea, and Mexico and recently UK joining. ECDC has convened this forum for regular information and experience sharing during the pandemic. Additionally, ECDC intensified its collaboration with other CDCs at bilateral level, in particular with China and US CDCs.</p> <p>ECDC intends to make public the exchanges with international partners to the extent possible considering the nature of the international relations, the confidentiality clauses included in the memoranda of understanding, and the risk of potentially damaging the collaboration with international partners. For example, ECDC could examine the possibility of sharing the minutes of the meetings of the Network of CDCs, currently shared with the participating CDCs and the Commission, with the Health Security Committee or making public summaries of these meetings, subject to the agreement of the participating parties.</p> <p>Furthermore, relevant information gained through discussions with ECDC international partners is already used in the preparation of ECDC risk assessments, which are published on ECDC website.</p>
---	--	--

		<p>On the other hand, sharing information on specific questions exchanged via emails on a daily basis, which was the case in our contacts with our international partners during the COVID-19 pandemic, should not be included in this process as disclosure might impact ECDC's international collaboration and information flow that is extremely important in public health crisis as the current pandemic.</p>
<p>5. Revise its communication strategy, with a view to designating a wider target audience (the general public) for its communication work.</p>	<p><i>The ECDC should revise its communication strategy, with a view to designating a wider target audience (the general public) for its communication work, promoting more proactive media relations, and enhancing its use of digital communications channels by developing tailor-made content.</i></p>	<p>As the ECDC amended Founding Regulation remains under negotiations in the Council and the Parliament ECDC, the following should - at this stage - provide only an idea of possible avenues ECDC could be embarking depending on the final legal text.</p> <p>The general public is a secondary target audience in the present ECDC communication strategy, and it is ECDC's intention to tailor and enhance future efforts towards general public as part of the communication policy foreseen to be presented to the ECDC MB in late 2021 or beginning of 2022.</p> <p>This shift would be in line with the Centre's present mandate (Article 12 of the ECDC Founding Regulation) and it would also serve as a response to the recommendation of the ECDC third External Evaluation and the consequent MB recommendations.</p> <p>ECDC recognises the challenges in addressing general public and to mitigate these the Centre would act at the European Union level working closely with the Member States' authorities, according jointly agreed procedures.</p> <p>Media is considered pivotal in ECDC's efforts to raise awareness about prevention and control of infectious diseases. Based on the lessons learned during the COVID-19 crisis, ECDC would take a more proactive approach in its interactions with media. The media, from the Centre's perspective, includes general and specialised health journalists, along with editors, working in international, national, and regional outlets.</p>

		<p>Furthermore, ECDC would consider improving its outreach through digital channels by tailoring its communication outputs to satisfy the needs of its target audiences. These efforts would be based on ECDC’s scientific evidence, data, and publications. ECDC would continue its engagement to develop annual integrated communication campaigns on topics such as vaccination and prudent use of antibiotics, including template materials to be shared with the Member States for them to adapt and use as part of their national campaigns.</p>
<p>6. Update its language policy, with a view to making available more information in official EU languages other than English.</p>	<p><i>The ECDC should update its language policy, with a view to making available public information material in official EU languages other than English. To this end, the ECDC should take into account the Ombudsman’s practical recommendations on the use of official EU languages when communicating with the public.</i></p>	<p>Based on the present ECDC language policy, key publications for the general public are provided in all official EU languages, plus Icelandic and Norwegian, within available budget. Due to the high cost of translation, content targeted at the expert community is provided in English only. Furthermore, the content of these documents, due to the nature of communicable diseases and their spread can change rapidly, and thus translations could become a limiting factor for timely knowledge transfer.</p> <p>However, some documents targeted at less technical audiences, for example, policymakers, are also translated after consultation with the Member States, via their National Focal Points (NFPs) for communication, considering the public health relevance in each target language and weighting it against the cost implications.</p> <p><a href="#">Job vacancies</a> are translated into all official EU languages.</p> <p>The <a href="#">European Antibiotic Awareness Day (EAAD) campaign website</a> and the <a href="#">European Vaccination Information Portal (EVIP)</a> are translated into all official EU languages; EAAD is also available in Icelandic and Norwegian.</p> <p>The ECDC Language policy will be reviewed in 2023 in the light of the foreseen ECDC communication policy and PR guidance.</p>