

# Influenza vaccine supply for the Austrian population in the 2020/21 season

Recommendation of the Austrian Bioethics Commission – October 19, 2020

## The particular importance of influenza immunization during the COVID-19 pandemic

Since 2015, the Austrian Bioethics Commission has published several recommendations regarding vaccinations.<sup>1</sup> In June of this year, based on experience with the COVID-19 pandemic, it recommended measures aimed to promote active vaccination as a prophylaxis against certain diseases, including influenza (flu).<sup>2</sup> The simultaneous occurrence of COVID-19 and other infectious diseases increases the risk that the disease progresses particularly severely, not only in high-risk patients. Against this background, the Bioethics Commission considers it ethically essential to fully exploit the potential of vaccinations that are already available to fight these diseases, especially influenza. Prevention by immunization can provide effective protection against contracting the disease. This is not only in the interest of the individual, but also in the interest of the general public because this disease can have severe progressions and can tie up considerable capacities of the healthcare system. Its containment will therefore help ensure that the healthcare system remains operational during the COVID-19 pandemic. The available influenza vaccines can achieve the greatest effect if they are used to significantly increase the immunization rates, above all among risk groups.<sup>3</sup>

## Availability of the influenza vaccine in the 2020/21 season

In Austria, great efforts have been made to procure substantial quantities of the influenza vaccine to supply the population. In addition, pursuant to Section 57a of the Austrian Medicines Act (AMG) and an ordinance of the Federal Minister for Social Affairs, Health, Care and Consumer Protection (BMSGPK)<sup>4</sup> that was passed on the basis of Section 57a (2) of the aforementioned Act, there are special obligations in place for approval holders and pharmaceutical wholesalers which aim to ensure that the demand for influenza vaccines in Austria

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1 Bioethics Commission, Statement “Vaccination – ethical aspects”, June 1, 2015; Bioethics Commission, Statement on vaccination, May 6, 2019, available at <https://www.bundestkanzleramt.gv.at/en/topics/bioethics-commission/publications-bioethics.html>.

2 Bioethics Commission, Recommendation “Vaccination against diseases for which there are approved vaccines in times of the COVID-19 pandemic,” June 8, 2020, available at <https://www.bundestkanzleramt.gv.at/en/topics/bioethics-commission/publications-bioethics.html>.

3 Statement of the Standing Committee on Vaccination (STIKO) at the Robert Koch Institute (RKI), confirmation of the current recommendations for seasonal influenza vaccination for the 2020/21 influenza season in view of the effects of the COVID-19 pandemic (date: July 30, 2020), in: Robert Koch Institute (Ed.), Vaccination status of children and adolescents in the COVID-19 pandemic, p. 28 ff., available at [https://www.rki.de/DE/Content/Infekt/EpidBull/Archiv/2020/Ausgabe/32-33\\_20.pdf?\\_\\_blob=publicationFile](https://www.rki.de/DE/Content/Infekt/EpidBull/Archiv/2020/Ausgabe/32-33_20.pdf?__blob=publicationFile).

4 “Ordinance on Ensuring the Medicines Supply”, Federal Law Gazette II 30/2020.

is covered. In particular, this obligation precludes creation of quotas and movements of vaccines intended for the domestic market to other markets, both actions that could endanger the supply.<sup>5</sup>

The influenza vaccination is available at vaccination centers (e.g. health authorities, vaccination outpatient clinics, etc.), at various physicians' offices, and in some cases with a prescription directly at pharmacies as well as through certain vaccination programs, e.g. through employers. In the 2020/21 season, the influenza vaccine will also be distributed in particular through local authorities (Section 57 (1) no. 5 AMG). The Austrian Children's Vaccination Program of the federal government, the federal states and the social insurance system is organized by the federal states and is implemented somewhat differently in each state.<sup>6</sup>

## Importance of providing comprehensive and correct information on the influenza vaccination

As active vaccination prophylaxis against influenza has become so extremely relevant due to the COVID-19 pandemic, it is important to provide the public with as much information as possible about the significance, availability and recommended timing of an influenza vaccination. Such information should be provided, for example, by the Federal Ministry of Social Affairs, Health, Care and Consumer Protection (BMSGPK)<sup>7</sup>, by the health authorities of the states, and by the media. The Austrian Broadcasting Corporation (ORF) in particular can make a significant contribution in the context of its specific legal mandate to provide comprehensive information to the general public, especially on health issues (Section 4 (1) no. 1, 14 in conjunction with Section 4c ORF Act). Particular importance should be attached to providing objective and transparent information with the aim of showing people an effective way to get an influenza vaccination. Professional associations of doctors and pharmacists, by informing their members, can also ensure that people receive high-quality information about the availability of influenza vaccines.

The information on the influenza vaccination should primarily address and reach those persons who are high priority to receive a vaccination during the COVID-19 pandemic. According to a WHO recommendation, these are health professionals and persons over the age of 60 (highest priority) as well as persons with chronic diseases, pregnant women and children between 6 and 59 months.<sup>8</sup> In its "Recommendation on influenza vaccination (flu vaccination) for the 2020/2021 season", the Federal Ministry of Social Affairs, Health, Care and consumer Protection (BMSGPK) listed the individual groups of persons in detail.<sup>9</sup>

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5 See ErlRV 1092 BlgNR 22. GP.

6 The contact points in the federal states can be found at [www.gesundheit.gv.at/service/beratungsstellen/impfen](http://www.gesundheit.gv.at/service/beratungsstellen/impfen).

7 BMSGPK, FAQs Influenza Vaccination, available in German only at [https://www.sozialministerium.at/Themen/Gesundheit/Impfen/Impfempfehlungen-Allgemein/Empfehlung-Influenza-Impfung-\(-Grippeimpfung\)-Saison-2020-2021.html](https://www.sozialministerium.at/Themen/Gesundheit/Impfen/Impfempfehlungen-Allgemein/Empfehlung-Influenza-Impfung-(-Grippeimpfung)-Saison-2020-2021.html).

8 See <https://www.who.int/influenza/vaccines/use/en/> (Date: Oct. 15, 2020).

9 BMSGPK, Recommendation on influenza vaccination (flu vaccination) for the 2020/2021 season, available in German only at [https://www.sozialministerium.at/Themen/Gesundheit/Impfen/Impfempfehlungen-Allgemein/Empfehlung-Influenza-Impfung-\(-Grippeimpfung\)-Saison-2020-2021.html](https://www.sozialministerium.at/Themen/Gesundheit/Impfen/Impfempfehlungen-Allgemein/Empfehlung-Influenza-Impfung-(-Grippeimpfung)-Saison-2020-2021.html).

## Allocation of the influenza vaccine in case of shortage

The Bioethics Commission recommends taking steps to forecast the need for and available quantities of influenza vaccines as accurately as possible. One such step could be to oblige the players along the supply chain (approval holders, wholesalers, pharmacies) to provide information on the quantity at their disposal on the basis of Section 57a of the Austrian Medicines Act (AMG). If a sufficient quantity of influenza vaccines is not available and a shortage appears imminent, it is urgently recommended to take appropriate measures to ensure that at least those persons for whom vaccination is a priority can receive one (see above). In such a situation, the Bioethics Commission recommends that in particular the use of the “special provision in connection with crisis situations” according to Section 94d of the Austrian Medicines Act (AMG) be examined. Based on this provision, the Federal Minister of Social Affairs, Health, Care and Consumer Protection can require that certain medicines be supplied and provided to the population in order to ensure the necessary supply during a pandemic.<sup>10</sup> In the event of a shortage, the supply of the influenza vaccine to the above-mentioned risk groups appears to be particularly “necessary.” Such an understanding is also obvious in light of the constitutional requirement of objectivity (Article 7 (1) of the Federal Constitution) and the duties of protection derived from the fundamental right to life (Article 2 of the ECHR), which call for measures to maintain the healthcare system.

## Conclusion

The Bioethics Commission also reiterates its recommendation to take measures and support efforts to promote the production of vaccines in Europe. Finally, it points out that, despite having received an influenza vaccination, it is still essential for people to wear a mask that covers their mouth and nose and to comply with general hygiene rules (distance, hand hygiene). These are key instruments for halting the spread of the COVID-19 pandemic.

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<sup>10</sup> The Ordinance concerning special regulations for drugs for the duration of the COVID-19 pandemic, Federal Law Gazette II 213/2020, has already been issued based on this foundation.