

EKHA OPEN LETTER TO EU POLICYMAKERS ON BEHALF OF THE EUROPEAN ORGAN
DONATION AND TRANSPLANTATION COMMUNITY

**“LIFE AFTER COVID-19: TIME TO REALISE A SECOND EU ACTION
PLAN ON ORGAN DONATION AND TRANSPLANTATION”**

Brussels, January 2021

To:

*President of the European Commission, Ms. Ursula Von der Leyen,
European Commissioner for Health and Food Safety, Ms. Stella Kyriakides,
European Parliament President, Mr. David Sassoli
Portuguese Minister of Health, Ms. Marta Temido & health attachés of the 27 EU Member States,
National Competent Authorities for Organ Donation and Transplantation of the 27 EU Member States*

The European Kidney Health Alliance (EKHA), joined by the co-signatories below, herewith renews its call for a **Second EU Action Plan on Organ Donation and Transplantation** in light of the ongoing COVID-19 crisis and its heavy toll on organ donation and transplantation across the EU Member States.

Organ transplantation is a life-saving treatment for patients with end-stage organ failure, offering a better quality of life at lower societal cost. Even in end-stage kidney disease, where dialysis as a therapeutic alternative is available on a large scale, transplantation constitutes the best treatment option.

Organ donation and transplantation in the EU advanced remarkably between 2009 and 2015, thanks to the momentum achieved by the [EU Action Plan on Organ Donation and Transplantation](#). With strong, proactive support from the Member States, the EU Action Plan helped increase organ availability, enhance efficiency and accessibility of transplant systems and improve quality and safety¹. However, since the end of the EU Action Plan, progress has levelled off, despite the surging need for transplanted organs². In 2019, EKHA was nominated by the European Commission to lead a Thematic Network on Improving Organ Donation and Transplantation in the EU, which culminated in a multi-stakeholder [Joint Statement](#) with policy calls and recommendations to address the following long-standing challenges:

- **significant variation in both living and deceased organ donation rates** across the EU.
- **significant variation in annual organ transplantation rates** per million population across the EU, with over tenfold difference between countries with the highest and lowest annual rates.
- marked **inequities in access** to transplantation for specific subgroups in society, including minorities and those with lower levels of health literacy.
- persistent shortage of available organs, as illustrated by the **ever-growing waiting lists** and people deteriorating or dying while awaiting transplantation.
- considerably **lower survival outcomes of transplanted patients** compared to the general population, due to complications such as cancer, vascular disease and infections.

The outbreak of the COVID-19 pandemic has exacerbated these existing challenges while bringing to fore the vital role of transplantation once again. During the pandemic, **a substantial number of patients that could have been transplanted died while waitlisted**, due to dramatic reductions in organ donation and transplantation reaching as high as 80% in some EU countries³. Transplants from deceased donors were limited to extremely urgent situations only; while living donation programmes were suspended amid the lockdown and fear of infection further curtailed living donation in many cases.

While plummeting transplantation rates always have profound implications for long-term outcomes, they are particularly alarming in a pandemic context, whereby minimising chronic disease patients' need for hospital visits is of vital concern to reduce their risk of exposure as a highly vulnerable group. It has been shown that during the outbreak, **the risk of being infected by COVID-19 was more than 4 times**

¹ European Commission [FACTOR Study](#) on the uptake and impact of the EU Action Plan on Organ Donation and Transplantation (2009-2015) in the EU Member States

² See [Council of Europe Newsletter Transplant volumes](#) since 2015

³ According to the June 2020 [COVID-19 statement](#) of EU National Competent Authorities for Organ Donation and Transplantation

lower for kidney transplant recipients than for haemodialysis patients⁴. This is mainly because transplant patients can be managed at home, while haemodialysis still mostly takes place in hospital settings. Therefore, **promoting transplantation is integral to fostering future preparedness for other mass infectious disease emergencies** we may likely encounter in the years to come.

On the other hand, **despite lower infection rates, transplant patients infected with COVID-19 have been among the risk groups with the highest mortality^{5,6},** stressing the need for developing approaches towards lowering the risk of infectious morbidity and mortality for transplant recipients. An important means to address this would be giving priority to organ transplant recipients and patients with organ failure on waiting lists in the vaccination campaigns against COVID-19. However, though urgently needed, **data on the efficacy and adverse effects of different types of vaccines in transplant populations is currently not available due to their exclusion from clinical studies.**

It is clear that we need to act now to stem and turn the tide, by tackling both immediate COVID-19-related issues and other persistent problems preceding the pandemic, through a long-term vision. While some excellent recommendations have been made to address the impact of COVID-19, **there remains a pressing need for EU-level guidance and support to Member States in the implementation of these recommendations for lasting improvements.** This goes hand-in-hand with harmonising different approaches among countries, facilitating coordination and monitoring progress.

EKHA therefore fully supports the call for collaborative action articulated in the June 2020 [COVID-19 statement](#) of the EU National Competent Authorities for Organ Donation and Transplantation, and further urges EU policymakers to move the dial on realising a Second EU Action Plan on Organ Donation and Transplantation, in line with the calls and recommendations of the 2019 EKHA Joint Statement. **A comprehensive follow-up EU Action Plan would be best placed to tackle the mounting pressure on national organ donation and transplantation programmes in the face of the COVID-19 pandemic and beyond.** The time is now to build on the EU organ donation and transplantation community's achievements the past years, to ensure the maximum benefit for our patients.

Yours sincerely,

Prof. Raymond Vanholder, EKHA President



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⁴ Quintaliani, G., Reboldi, G., Di Napoli, A. *et al.* Exposure to novel coronavirus in patients on renal replacement therapy during the exponential phase of COVID-19 pandemic: survey of the Italian Society of Nephrology. *J Nephrol* 33, 725–736 (2020). <https://doi.org/10.1007/s40620-020-00794-1>

⁵ Williamson, E.J., Walker, A.J., Bhaskaran, K. *et al.* Factors associated with COVID-19-related death using OpenSAFELY. *Nature* 584, 430–436 (2020). <https://doi.org/10.1038/s41586-020-2521-4>

⁶ Coll, E., Fernández-Ruiz, M., Sánchez-Álvarez, J.E. *et al.* COVID-19 in transplant recipients: The Spanish experience. *Am J Transplant* 00, 1-13 (2020). <https://doi.org/10.1111/ajt.16369>