



European Public Health Alliance (EPHA)

Written comments in response to the consultation on the “Draft concept note: developing the WHO Regional Office for Europe Access to Novel Medicines Platform”

EPHA has supported the work of the WHO Europe and the Oslo Medicines Initiative since its inception and welcomes the development of the multi-stakeholder Access to Novel Medicines Platform. We also welcome the opportunity of providing further comments to the draft Concept Note and outlined terms of reference for the platform as shared during the consultation with non-state actors on 8 February 2023.

Access to affordable medicines has long been a crucial issue. Increasing prices for many medicines, including those deemed as “novel” by the draft concept note, is currently threatening the health and wellbeing of patients as well as the sustainability of healthcare systems in Europe and the world. And indeed, while the COVID pandemic highlighted the opportunities that science could offer to rapidly manage a pandemic, it also exposed deficits in the systems that should enable equitable and rapid access to medicines for those in need. Since then, the Ukraine conflict, economic and energy crises have put further pressure on people and healthcare systems.

Solutions to this issue are urgently needed and the upcoming revision of the EU pharmaceutical legislation offers further opportunities to improve the current system.

Against this background, we wish to provide the following reflections and recommendations:

1. While we believe that the four strategic aims proposed for the platform are important, we wish to highlight that the need to improve the transparency of pharmaceutical markets is crucial and could potentially address the structural and pervasive information asymmetries in the sector. Indeed, transparency on the pharmaceutical market will be crucial to build trust and spur collaboration across all sectors in the spirit of the multi-stakeholder platform. In addition to market transparency and transparency of prices, it will be important to add transparency of research and development costs, including clinical trial costs, and of the results of clinical trials, to ensure that science advances at the pace needed by patients and in the spirit of the WHA72.8 Resolution.
2. From a more practical standpoint, it will be important to further understand how the WHO Europe will make sure the platform remains 'neutral'. As the sectors and actors involved in the platform have different interests and resources, it will be crucial that the WHO Europe actively supports the engagement of sectors that might find it harder to participate in this dialogue (e.g., NGOs representing patients, healthcare professionals or civil society). This could entail actively supporting the engagement of these sectors to ensure an inclusive and diverse dialogue and potentially capping the participation of other industrial sectors that have wider availability of resources to be represented at the platform. **Fair representation of all stakeholder groups will be crucial.**
3. A patient and people-centered approach should be maintained within the activities and outputs of the platform. Further clarification of expected outcomes, their timelines and scope would be welcome. The OMI Declaration stated that the newly launched platform “will promote constructive dialogue and collaboration to agree on concrete actions and deliverables”. **Patients and healthcare systems are urgently in need of solutions and expected outcomes from the platform should be able to contribute with concrete actions and solutions.**
4. As for the work packages for prioritization, it is important to highlight that some of them are grounded on evidence and agreement with Member States, such as the need to support the implementation of



the framework set out in WHA 72.8, whereas others, such as the mention of 'equity-based tiered pricing', are directly coming proposals unilaterally developed by the industry sector. On top of this, core aspects of this proposal are in contradiction with the WHA 72.8 Resolution.

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