



Pandemic Action Network Comments on *Pandemic Fund Draft Medium Term Strategic Plan - April 2024*

Pandemic Action Network (PAN) welcomes the opportunity to review and provide feedback on the draft Strategic Plan for the Pandemic Fund for 2024-2029. PAN is a global network of 400+ diverse organizations committed to building a pandemic-resilient world, and has been a leading champion for mobilizing additional funding for pandemic preparedness, prevention, and response (pandemic PPR).

Below PAN recommends areas to be clarified, strengthened, or revised in the draft Strategic Plan to better articulate and bolster the Pandemic Fund's role and value-add in the pandemic PPR and global financing landscape, to promote equity and inclusion, and build the political will required to ensure that the Pandemic Fund is fit-for-purpose and well-resourced to advance country and regional priorities in pandemic PPR and achieve its transformational potential.

Overarching comments

- **In line with the original ambition for its establishment in 2022, and building on lessons learned from its first 18 months of operation, it is time for the Pandemic Fund to mature, grow, and act with urgency** to better respond to low- and middle-income country demands for additional, long-term financing and greater inclusion, to close critical pandemic PPR gaps in the face of emerging pandemic threats, and accelerate efforts to build a safer, healthier, more equitable and resilient world. The Strategic Plan should reflect these imperatives.
- **The draft plan would benefit from a more compelling political narrative** that more effectively makes the case for the Pandemic Fund to both new and existing investors and stakeholders of the need for urgent action on pandemic PPR and to expand and deepen the Pandemic Fund's base of political and financial support. Currently, the draft paper conveys a more minimalist and technocratic approach for the Pandemic Fund than what was envisaged by the [G20 High-Level Panel on Financing the Global Commons](#) and by G20 political leaders, based on the lessons and devastating losses from COVID and prior epidemics and pandemics. While we note that a separate Resource Mobilization (RM) Strategy is under preparation, the Strategic Plan serves as the foundation for the RM strategy and there is strong competition for funding. Thus it is important that the Strategic Plan resonates clearly with a diverse array of political leaders and funders.
- **The unique value proposition of the Pandemic Fund** as laid out in the draft Strategic Plan would benefit from being sharper and more "front and center" in the document. The Strategic Plan should center on strengthening the vital role of the Pandemic Fund to advocate for and incentivize political and financial prioritization of pandemic PPR; mobilize new, additional, long-term resources from an array of sources; and play a coordination role in the global architecture to address the most critical gaps in pandemic PPR and accelerate action and impact.
- **Stress the need for continued agility and evolution:** In its initial operating phase, the Pandemic Fund has been adjusting and evolving its model based on lessons learned. The Strategic Plan should state clearly the intention for the Pandemic Fund to remain agile, flexible, and innovative going forward so that it continues to evolve in response to emerging pandemic PPR financing needs and/or changes in the financing landscape, including helping countries fulfill their obligations under a future WHO Pandemic Agreement and amended International Health Regulations (IHRs).
- **Resource mobilization ambitions should not be pre-emptively limited:** While it is appropriate that the draft Strategic Plan does not go into details on the RM strategy, it is unfortunate that the plan and priorities appear to be based on acceptance of a minimalist funding environment, rather than asserting the imperative to mobilize an ambitious funding envelope. The contrast of this draft with the urgent call for investment in the G20 HLIP report is striking. Presumption of a minimalist funding scenario in the Strategic Plan will likely complicate efforts to mobilize political leaders and champions behind a strong pledging round in 2024. The Strategic Plan should state clearly the need and ambition to secure a step increase in additional, long-term funding for pandemic PPR

as a global public good, and put the Pandemic Fund on a sustainable pathway to secure the estimated \$10 billion annual need for additional international pandemic preparedness financing.

- **The Strategic Plan should be more fulsome in identifying other potential sources of additional, long-term funding** beyond the cursory mentions in the paper, anchoring the Pandemic Fund more clearly in the broader global finance reform conversation. Specific opportunities to mobilize other resources to be explored should include e.g. from multilateral development bank (MDB) reforms, debt swaps, SDR rechanneling, loan guarantees, new wealth and other international tax schemes, as well as tapping other public budgets beyond health.
- **The Strategic Plan should state clearly that the Pandemic Fund's goal is not to compete with other global health or development financing initiatives but rather to expand the overall financing pie for pandemic PPR**, including e.g. by expanding the number of contributing countries and for all countries to increase their support in line with Global Public Investment Principles and their ability to pay. .
- **Proactive engagement and inclusion of low- and middle-income countries and non-state actors should go much further and deeper than what is currently outlined.** The sections on governance and stakeholder engagement mostly convey general principles, but they should be more specific and action-oriented. For co-investor engagement, the Strategic Plan should include a clear roadmap to strengthen low- and middle-income country leadership roles in the Pandemic Fund, and indicate how this responds to co-investor priorities and needs. For civil society, the Strategic Plan should apply the experience of other FIFs and commit to establish and fund a dedicated civil society engagement mechanism. The Governing Board should also consider near-term opportunities for expansion to other stakeholder groups, including e.g. seats for communities and the private sector (both represented on the Global Fund board) and to increase co-investor representation.
- **Engagement beyond the health sector:** One of the assets of the Pandemic Fund is that it brings finance and health ministries together around the pandemic PPR global challenge. The Strategic Plan should elaborate on how the Pandemic Fund will expand the community of PPR and PPR-related stakeholders and champions beyond global health, and how it will drive whole-of-government planning, collaboration, and budgeting to elevate and integrate pandemic PPR across all sectors. The Strategic Plan should discuss the role of the Pandemic Fund not just as another global health fund, but to stress the links between pandemic PPR and global and national security, climate change, resilience, and economic development and growth.
- **Reduce the timeline for the Strategic Plan from five to three years and/or or to hold a mid-term review in 2026** to assess if the Plan is on track, well-targeted, and/or if changes are warranted to the Pandemic Fund's priorities, governance, and operating modalities. Especially as this is a relatively new fund in a very dynamic environment, a five-year strategy period is quite long. The Strategic Plan references "trigger points" to re-evaluate the strategy, but review and realignment should not need to wait for an emergency-level event (Public Health Emergency of International Concern, humanitarian crisis, or climate emergency are listed as examples). Regular and routine assessment should be factored into operationalizing the Strategic Plan, along with more timely and proactive communications, consultation, and feedback opportunities.

Specific points and questions

Sections 1 - Vision, mission, scope, and impact ambition

- Section 1.1 - Suggest to use most current official WHO tally and higher excess mortality estimates, as of April 2024, rather than the number of COVID deaths as of May 2022, when pandemic continue to spread after that time (and the pandemic is still ongoing and people are still dying from it). Some COVID excess mortality estimates are as high as 24 million.
- Sections 1.1 - 1.4: The draft storyline vastly undersells the Pandemic Fund's promise. Recommend repositioning the sections on vision, mission, value proposition, and impact ambition and moving them up front before going into the background and first year retrospective.
- Section 1.4 - "Filling capacity gaps" comes across as a relatively minimalist role and level of ambition for the Fund. Recommend highlighting the vision and describing the Pandemic Fund's

role as “ensuring that every country has the capacity to prevent, prepare for, and rapidly respond to outbreaks and stop them from becoming deadly and costly pandemics.” Strengthen the focus up front here and throughout the paper on the Pandemic Fund’s role in mobilizing new and additional resources, not just bringing together multiple funding streams that already exist and filling capacity gaps. Pandemic PPR is still vastly underfunded and this point needs to be emphasized in the Strategic Plan.

- In the graphic describing the Pandemic Fund’s three value propositions, suggest to bring the mobilizing additive investment priority up to #1.
- Section 1.5 - Five-year impact ambition: This section indicates that metrics are forthcoming, but we would urge that the impact targets should be more specific and measurable to show meaningful progress and to demonstrate the value-add of the Pandemic Fund. Numerical targets should be used where possible, building on existing international monitoring and evaluation tools. For example, rather than “increased ability” of countries to do X, the Pandemic Fund should consider setting a target number of countries and/or a target percentage change or growth in capacity.
- In order to achieve Outcome 2 on “better prepared to respond,” the Pandemic Fund should also prioritize investments in strengthening country and regional health emergency response capacities and planning, in addition to workforce.
- For Outcome 3, “increased engagement” must also have a qualitative measure which reflects the breadth, depth, and sustained engagement of stakeholders.
- Outcome 4 should be both increased and sustained investment, not “and/or”
- This section should indicate that stakeholders and experts beyond the Governing Board members and alternates will be engaged and consulted on these metrics.

Section 2 - Focus areas, cross-cutting enablers, and underlying themes

- Sections 2.1 - 2.2 - The language in Annex B on rationales for the priority focus areas should be moved and/or elaborated on in this section of the main text.
- Annex B and the main paper should also include an expanded analysis of the funding landscape, including high debt distress of LMICs which is contracting fiscal space and domestic investments in health and pandemic PPR.
- Section 2.3 - Annex C and the main paper should expound on the role of NPHIs and what types of global and regional networks are envisioned.
- Section 2.4 - Health equity should be listed first among the underlying themes, and the paper should include language on the importance of building resilient health systems that can continue to deliver essential services and effectively pivot in a pandemic or other health emergency.
- Climate change and national security should be included in the mention of underlying themes, given their strong links with pandemics.
- How will the Pandemic Fund ensure priority underlying themes are “fully integrated into funded projects”? The Strategic Plan should specify the steps it will take to operationally integrate them. e.g. will it use application criteria? Other M&E metrics? Dedicate additional resources?

Section 3 - Resource allocation

- Section 3.1 - Recommend to rework this section to start with the strong need/case for investment and then to caveat on the need to adjust if fewer resources are available, not the other way around. The Strategic Plan should be written in such a way to assert the need for the Pandemic Fund to be well-resourced.
- Section 3.2 - The Strategic Plan indicates that definitions will follow, but it is important to have a clear, metrics based definition of “countries with the largest gaps in pandemic PPR capacity.” It will also be important for countries to understand which allocation modality they fall into. Will

“countries with the largest gaps in pandemic PPR capacity” also be able to apply via the IBRD/IDA window?

- As COVID-19 demonstrated the importance of regional collaboration and cooperation, and reducing fragmentation is touted as a hallmark of the Pandemic Fund, regional entities and projects should be a higher priority for Pandemic Fund investment, rather than relegated to a third category if sufficient funding allows. Will multi country proposals still be permitted in the first category?
- The language on consideration of the Pandemic Fund’s role in response financing should be elaborated to make clear that response will require much greater investment. The paper should also discuss how the Pandemic Fund will seek to protect investments in prevention and preparedness from being derailed in the event of an emergency response - to avoid repeating the cycle of panic and neglect.
- This section should say more about the need for flexibility overall as a hallmark of the Strategic Plan; flexibility should be limited only to response financing. The Fund should continue to evolve its priorities and modalities as pandemic PPR needs evolve.
- Section 3.3 - We support the proposal for rolling deadlines and streamlined processes, but future funding calls should also have shorter timeframes. Holding one call for proposals per year is not keeping the Pandemic Fund’s ambition or with urgent country needs.

Section 4 - Cooperation, coordination, and collaboration

- Section 4.1 - Implementing Entities should be introduced earlier (in section 1.4) of the paper in the context of the Pandemic Fund’s coordinating role and discuss the efforts underway to reduce fragmentation and promote collaboration..
- The section should not only discuss how the Pandemic Fund will work with and tap IEs, but also what value it provides to them. It should also indicate how the Pandemic Fund intends to attract new IEs to fill the gaps described and reach a more ideal composition.
- Section 4.2 - We would like to see more details on how the Pandemic Fund will map PPR funding and gaps and how the mapping will inform funding decisions. Will the mapping be public, to further benefit coordination and alignment?
- We would also like to see more details on how the engagement and coordination (and expansion) of pandemic PPR funders will happen.
- Section 4.3 - The paragraph on “putting countries at the center” should be pulled up and strengthened, e.g. to discuss how the Pandemic Fund will seek to catalyze national pandemic PPR efforts, aligning partners around robust national plans and crowding in resources.

Section 5 - Catalyzing additional funding

- Section 5.2 - This section would benefit from a more expansive discussion of other potential domestic and international financing sources, Specific opportunities to mobilize other resources to be explored should include e.g. from multilateral development bank (MDB) reforms, debt swaps, SDR rechanneling, loan guarantees, new wealth and other international tax schemes, and more - and tapping other public budgets beyond health. This section should also discuss the Fund’s role in fostering alignment with country processes and partnering with MDBs to prioritize pandemic PPR in national budgeting, unlock other domestic sources of financing and identify efficiencies
- Stakeholders outside the Governing Board should be invited in/consulted in development of co-financing and co-investment framework as well as to identify and jointly strategize around resource mobilization opportunities.

Section 6 - Governance and stakeholder engagement

- Sections 6.1 - 6.2 - In addition to adapting how Board meetings are run to be more inclusive, the Strategic Plan should lay out clear expectations and the intent to build and support systems to facilitate constituency consultation and engagement for all Board constituencies. This appears to be working well so far with investor seats, but not with civil society and co-investor constituencies.
- Currently, neither the civil society nor the co-investor constituencies have sufficient mechanisms in place for systematic, inclusive, and timely consultation to ensure that their Governing Board representatives are reflecting views beyond their own. Short timelines, time zones, and lack of funding for dedicated focal points have been key obstacles.
- The Governing Board should invite stakeholders outside of the board to join strategic discussions and ensure timely consultations on a regular basis as part of its deliberative process.
- Section 6.1 - This section should discuss potential opportunities and timeline for expanding the Governing Board to expand to include more constituencies, including e.g. seats for communities and the private sector (as is the case with the Global Fund) and more co-investor countries.
- Section 6.3 - Meaningful civil society engagement will require much more than a designated person in the Secretariat to “encourage” it. This section should elaborate and commit to establish and fund a dedicated civil society engagement mechanism (CSEM), to be managed by a third party that would be selected through a competitive proposal process. It should reference the CSEM proposal that has been developed by the civil society representatives on the Governing Board and civil society partners, which builds on lessons from other global financing mechanisms including the Global Fund, GPE, GFF, and Gavi.
- Given the Pandemic Fund’s stated intentions to partner with the private sector, this section should include an additional paragraph on how it will do so.
- Section 6.4 - This section very narrowly defines transparency and accountability to focus on after the fact reporting. It should include a more fulsome commitment and plan to increase transparency and accountability to ensure more timely and up/front proactive communications, consultation, and stakeholder engagement.

Section 7 - Path forward

- This section should be more specific about plans for regular progress review and assessment of the Strategic Plan, not only in light of emergencies. Currently the plan references “trigger points” to reevaluate the strategy, however we believe that review and realignment should not need to wait for an emergency-level event (Public Health Emergency of International Concern, humanitarian crisis, or climate emergency currently listed as examples).
- Recommend a reduced timeline for the Strategic Plan of no more than three years, or at a minimum a review in 2026 to assess if the Strategic Plan is on track, well-targeted, and/or if changes are warranted to the Pandemic Fund’s governance and operating modalities.
- What support and funding will the Secretariat have to fully operationalise the commitments set forth in the Strategic Plan?