

## Consultation on World Health Organization's 13<sup>th</sup> General Programme of Work (GPW13)

Health Action International ([HAI](#)) welcomes the opportunity to contribute to the consultation process on the World Health Organization's ([WHO](#)) General Programme of Work ([GPW13](#)). We note positively the emphasis on promoting Universal Health Coverage ([UHC](#)) and the willingness to align WHO within the framework of the Sustainable Development Goals ([SDG](#)). We also welcome the pre-eminent place granted throughout the text to different forms of innovation.

### **Access to Medicines**

We agree that access to quality-assured medicines plays a critical role in improving and expanding UHC and that the high cost of medicines is cause for financial hardship. We endorse WHO support for policies that improve and accelerate access to generics and biosimilars. Vaccines should also be included in the objectives of such policies.

### **Research and Development**

WHO plays an important stewardship role in coordinating research and development (R&D) efforts based on health needs. These efforts should build upon existing efforts, such as, among others, the [Global Observatory on Health R&D](#), the Global Antibiotic Research and Development Partnership ([GARDP](#)), and the Global Strategy on Public Health, Innovation and Intellectual Property.

We believe that WHO, together with Member States and partners, can play a major role in advancing towards a new R&D model based on the principle of delinkage; in this sense we would support the development, under WHO leadership and guidance, of feasibility studies of alternative innovation mechanisms for cancer, multi-drug resistant tuberculosis (MDR-TB) and other diseases.

### **Intellectual Property**

While there is no reference to intellectual property (IP) rights in GPW13, there is widespread consensus on the negative effects that excessive IP protection measures, such as extended patents and supplementary protection certificates (SPC), can have on access conditions to medical technologies.

We encourage WHO to continue its technical assistance work on the use of IP management tools, such as flexibilities and other public health-oriented legal and administrative instruments, to reduce procurement costs and improve access conditions in line with SDG 3.8.

### **Transparency**

We positively note the intention of providing technical assistance to Member States to strengthen key data systems and the promotion of open reporting of health data. We suggest, however, the inclusion of clinical trial data and procurement/reimbursement prices among the collected information. We strongly agree that open data is a public good.

**HAI remains committed to continued collaboration with WHO at the national, regional and global level through our work and expertise on access to medicines, neglected tropical diseases (NTD) and strengthening of national health systems.**