Vaccines Europe
An industry for healthy lives

Vaccines Europe (VE) response to the call for evidence on Union prevention, preparedness, and response plan for health crises

29 October 2025

Vaccines Europe (VE) welcomes the EC's initiatives for further alignment and coordination of preparedness and response measures across Member States (MS). The plan should build upon and operationalise **Regulation (EU) 2022/2371 on serious cross-border threats to health**, which rightly recognises the importance of prevention, surveillance, and rapid availability of medical countermeasures (MCMs) incl. vaccines as essential components of EU health security.

The COVID-19 pandemic has demonstrated the essential role of immunisation in protecting citizens, maintaining public health, and ensuring societal and economic resilience. Building on lessons learned, VE calls for a coherent EU approach that reinforces prevention via immunisation, supports competitiveness and innovation, and accelerates regulatory and market access mechanisms for vaccines as crucial MCMs:

- **Preparedness begins with strong National Immunisation Programmes (NIPs)**, which are the backbone of resilient healthcare systems and the first line of defence against future health threats. Robust NIPs drive vaccine uptake, sustain manufacturing, and enable rapid deployment in crises. Immunisation offers exceptional value, with adult immunisation programmes (e.g. influenza, RSV, pneumococcal, herpes zoster) delivering returns up to 19 times their investment, yet in nearly 80% of EU MSs, only 0.5% of healthcare budgets are dedicated to immunisation. EU needs to leverage the New Economic Governance Framework (NEGF) to recognise immunisation and screening as strategic capital investments, not merely expenditures. This approach would ensure these programmes are prioritised, protected, and incentivised within national budgets as essential contributors to Europe's health security, preparedness, and economic resilience.

- **Establish an inclusive, coordinated, and financially sustainable European strategy to address misinformation related to immunisation**, ensuring increased confidence in vaccines and improved vaccination coverage, thereby strengthening society's preparedness and resilience.

- **Accelerate the Europe's digital infrastructure** by introducing interoperable digital immunisation records that enable real-time monitoring of vaccination coverage rates and population protection, as well as improving surveillance systems across EU countries under ECDC leadership, in particular for respiratory infections. This will improve evidence-based policymaking and support effective public investment and strategic planning across the vaccine ecosystem.

- **An agile regulatory environment is essential** to deliver timely access to safe and effective vaccines. Standardizing lessons learnt from COVID-19 and expending urgently the use of electronic product information (ePI) will facilitate timely updates, multilingual accessibility, and digital health integration. Additionally, EU common pack can provide more efficient and flexible vaccine supply across MSs and ensure timely access to citizens.

- **Joint procurement of vaccines should be limited to serious cross-border health threats**, such as pandemics or imminent outbreaks requiring EU-level coordination to protect public health. These measures must remain proportionate and time bound. The joint procurement should not extend to routine vaccines, given its complexity, potential disruption to national distribution systems and the internal market, and the risk of distorting competition or causing supply shortages.

VE believes that by transferring these principles into concrete actions as priority, the EU can strengthen its health security, leadership and global standing in vaccine innovation, in alignment with the Global Health Resilience Initiative. This Plan represents a critical opportunity to enhance coordinated preparedness and solidarity in the face of future health threats. The vaccines industry stands ready to collaborate with EU and MSs to turn these ambitions into tangible outcomes that reinforce Europe's resilience and global leadership.

Attachment: Improving the Attractiveness of the Vaccines Industry in the European Union