

EFPIA & Vaccines Europe Position Paper on the Global Health Resilience Initiative

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EFPIA and Vaccines Europe welcome the European Commission's initiative to develop a Global Health Resilience Initiative (GHRI). The challenges identified in the Call for Evidence, including health system fragility, declining financing, supply chain vulnerabilities, and fragmentation, are well-recognised and underline the need for a coordinated, forward-looking response to support global health security, and build cooperation and resilience.

The experience of the COVID-19 pandemic demonstrated that strong partnerships between governments, international organisations, and industry can deliver rapid innovation, scale manufacturing across regions, and ensure timely access to life-saving countermeasures. As the European Union (EU) defines its approach through the GHRI, it is essential to build on these lessons and reinforce the enabling conditions that made this response possible.

Competitiveness and innovation as foundations of global health

At the core of global health resilience lies a strong, innovative, and competitive life sciences sector. Europe has long been a global leader in vaccine science, research, development, and manufacturing, and its contribution to global health depends directly on its ability to sustain this leadership. However, this capacity is increasingly under pressure from global competition, shifting investment patterns, and an evolving regulatory environment.

Ensuring that Europe remains an attractive location for research, development, and advanced manufacturing is not only a vital industrial objective but also a global health imperative. The GHRI should explicitly recognise competitiveness as a core pillar of resilience and ensure full policy coherence between global health, industrial, trade, and innovation policies. In this context, it is essential that all measures developed under the initiative are subject to a systematic assessment of their impact on industry. A structured "competitiveness check" would also ensure that policy choices support, rather than inadvertently undermine, investment, supply capacity, and Europe's attractiveness as a global innovation hub.

Prevention, immunisation and trust

Strengthening global health resilience requires a greater focus on prevention and preventative medicines bringing considerable value to society and health care systems. Immunisation remains one of the most effective and with the highest return on investment public health interventions, allowing to address evolving health threats, including antimicrobial resistance, yet it continues to be under-prioritised in many systems. The GHRI presents an opportunity to place prevention, including immunisation across the life course, at the centre of global health strategies, alongside screening and early intervention.

At the same time, the growing impact of misinformation and disinformation must be addressed as a central component of resilience. Trust in science and public health institutions is essential for the success of prevention strategies and for effective responses to health emergencies. Strengthening resilient immunisation ecosystems therefore requires not only scientific and manufacturing capacity, but also strong delivery systems, predictable demand, and coordinated engagement with healthcare providers and communities.

Addressing antimicrobial resistance as a structural market failure

Antimicrobial resistance (AMR) represents one of the most significant and growing threats to global health resilience, yet it remains critically underfunded and insufficiently prioritised in current policy frameworks. Unlike other areas of pharmaceutical innovation, antimicrobial development is characterised by a structural market failure: high research and development costs combined with limited and unpredictable returns due to necessary stewardship measures and restricted use. As a result, the pipeline for novel antibiotics remains extremely fragile. Addressing AMR requires a step change in ambition and financing. The GHRI should explicitly recognise the need for robust, predictable, and adequately resourced incentive models that support sustainable antimicrobial innovation, including pull incentives and dedicated funding mechanisms commensurate with the scale of the challenge to enable the EU to contribute its fair share to the global effort to tackle AMR.

Building sustainable manufacturing capacity through partnership

We generally support the objective of strengthening local and regional manufacturing capacities and diversifying supply chains. At the same time, experience has shown that sustainable manufacturing ecosystems cannot be built through isolated or short-term measures. They require long-term investment, robust regulatory frameworks, skilled workforces, functioning markets, and a predictable environment and incentives for innovation.

Partnership-based approaches, grounded in voluntary and mutually agreed terms (VMAT), including on technology and know-how, are essential to ensure that local production efforts are viable, efficient, and integrated into global supply chains. These have demonstrated their effectiveness in enabling rapid scale-up during health emergencies and should remain the foundation of future efforts.

It is equally important to ensure that policy approaches do not unintentionally weaken the economic viability of manufacturing investments. Approaches based on pooled procurement or centralised allocation mechanisms risk distorting markets, reducing incentives for investment, and ultimately undermining supply resilience. A more effective approach would focus on enabling competitive, diversified markets and strengthening demand predictability, thereby supporting sustainable capacity development.

Ensuring coherence in an evolving multilateral landscape

The GHRI will operate in a rapidly evolving multilateral context, where new frameworks are shaping the future conditions for innovation and global collaboration. While these initiatives aim to address important global health and equity objectives, there is a growing risk of fragmentation, overlapping obligations, and increasing regulatory complexity for companies operating globally. Similar challenges are also emerging within the European Union, where regulatory layering can create additional uncertainty.

It is therefore essential that the European Union promotes coherent, science-based, and workable approaches, both internationally and internally, that avoid duplication and ensure legal certainty. A strong emphasis should be placed on voluntary, incentive-based mechanisms that support collaboration while preserving the conditions necessary for innovation.

Safeguarding intellectual property as an enabler of global health

Intellectual property is a fundamental enabler of innovation and a key driver of the rapid development and deployment of vaccines, therapeutics, and diagnostics. It supports investment in high-risk research, facilitates partnerships, and enables the transfer of technology across borders. Crucially, resilience and the ability to respond swiftly to health crises depend on R&D and

technologies developed in peacetime within a strong innovation ecosystem. The COVID-19 pandemic underscored this reality: breakthroughs such as mRNA and viral vector vaccines were made possible by decades of prior research supported by robust intellectual property protection.

At a time of increasing pressure on intellectual property systems globally, the GHRI should therefore clearly reaffirm the importance of strong, predictable and enforceable intellectual property frameworks, including robust regulatory frameworks. The initiative should also promote voluntary, mutually agreed approaches to licensing and technology transfer. Preserving a balanced and effective IP system is essential not only for Europe's competitiveness but also for the global capacity to respond to future health crises.

Conclusion

The Global Health Resilience Initiative represents a significant opportunity to strengthen Europe's global leadership while contributing to a more resilient, sustainable, and innovation-driven global health ecosystem. To fully realise this potential, it will be essential to ensure that the initiative reinforces Europe's competitiveness, promotes coherent and workable multilateral frameworks, and preserves the conditions necessary for innovation.

EFPIA and Vaccines Europe stand ready to continue engaging constructively with the Commission to support the development of an initiative that delivers on these shared objectives.