

June 11, 2021

Director-General Dr. Ngozi Okonjo-Iweala
Centre William Rappard
Rue de Lausanne, 154
Case postale
1211 Genève 2
Switzerland

Dear Director-General Dr. Ngozi Okonjo-Iweala:

The COVID pandemic has demonstrated how all stakeholders – multilateral organizations, governments, industry and civil society – have mobilized resources and come together in solidarity. As the pandemic continues to have a devastating impact in many parts of the world, there is an urgent need to step up efforts to get COVID-19 vaccines, therapeutics, diagnostics, oxygen and medical equipment to those who need them, wherever they live.

The undersigned international business associations applaud your vision and leadership for the involvement of the WTO in this important global challenge, including the way you have brought together other expert stakeholders such as GAVI and CEPI. We all need to work together to explore ways to broaden access and eliminate trade barriers that prevent vaccines and other medical goods and technologies from reaching those who need them. The key problem we are trying to solve require us to consider the trade-related obstacles that are preventing timely – and equitable – access to these critical products.

Industry agrees with world leaders that “nobody is safe, until everyone is safe” and is proud of how many of our companies have mobilized and shifted resources to help meet this challenge. Vaccinating the world against COVID-19 requires production, as well as widespread distribution and administration of vaccines. A sustainable, durable solution will necessarily address a host of issues, including: re-distribution of excess vaccine supplies to countries that face shortages; the regulatory and trade barriers to vaccine production and distribution; efficient supply chain operations; procurement challenges; and the potential risks associated with counterfeit and illicit trade in medical goods. A universal view – and concomitant solution – is needed to address these challenges. While increasing and diversifying global investment in life science research and manufacturing is an important and salutary longer-term goal, we should not let it distract from the immediate, urgent task of getting as many people vaccinated, as quickly, effectively and safely as possible.

The challenges associated with vaccinating the global population are multifaceted and require a holistic approach, rather than one narrowly focused on intellectual property, which has not proven to be a barrier to the discovery or distribution of Covid-related technologies and is in fact *enabling* additional manufacturing and technology transfer through voluntary licenses. Discussions regarding a “waiver” of certain provisions of the TRIPS Agreement for the prevention, containment and treatment of COVID-19 have proven poorly matched to the actual needs of the global community of nations that the WTO represents. In addition to not addressing COVID-19 vaccine equity, any proposed waiver would compromise the world’s ability to respond to this and future pandemics.

As you explore the way forward, we would encourage greater consideration of the initiative reflected in the draft General Council Declaration on [Trade and Health: COVID-19 and Beyond](#), which addresses a broad range of *genuine* trade barriers ranging from export restrictions and technical regulations to quarantine obligations on essential transport and logistics services providers to the removal or reduction of tariffs on goods that are considered essential to fighting the COVID-19 pandemic. In our view, this initiative has the greatest potential to help advance the manufacture, distribution and administration of vaccines and other medical technologies.

Advancement of the Declaration to concrete action must be accelerated to meet the growing global need. We also understand a small group may be created to discuss potential outcomes on “trade and health” for the 12th WTO Ministerial Conference; however, now is the time for action to remove unnecessary barriers and ensure that the extraordinary progress now being made continues at pace. These are actions that the WTO can help facilitate without prolonged text negotiations.

At the recent World Health Assembly, WHO Director-General Dr. Tedros called on Member States to “support a massive push to vaccinate at least 10 percent of the population of every country *by September*” – that is, within the next four months. In fact, the necessary efforts are well under way, with over 275 industry partnerships in place around the world. We appreciate the efforts of the [COVAX Manufacturing Task Force](#), which is bringing together innovators and manufacturers, and expect that this kind of matchmaking will lead to even more global partnerships and enable greater production, without exacerbating the global competition for finite ingredients and other inputs.

Global vaccine manufacturing capacity is currently forecast to reach or exceed 11 billion doses before the end of 2021, with many more in early 2022 – enough to cover the adult world population. In addition, COVAX is on track to deliver at least 2 billion doses by the end of this year, including at least 1.3 billion doses to 92 lower income economies in the Gavi COVAX AMC.¹ These numbers are likely to increase significantly as countries donate additional surplus supplies to COVAX in the coming months.

More can be done to support distribution, however, and that is increasingly going to be the challenge for COVAX and for governments and localities around the world. Industry fully supports bilateral and plurilateral efforts to provide capacity building, including logistics support and the provision of qualified personnel. We note the CARE [policy report](#) that suggests for every \$1US spent on vaccine procurement an additional \$5US must be spent on distribution in parts of Africa. It is a tragedy that millions of doses of vaccines are being wasted due to their expiration before they can be distributed.

Streamlining regulations and removing trade barriers on medical goods will have an immediate, positive, and demonstrable effect on the distribution and administration of vaccines and other important technologies, and we fully support WTO leadership and immediate action. We hope that the approach offered is a positive contribution to the solution that the world is looking to the WTO to contribute.

Yours respectfully,



Canadian
Chamber of
Commerce

Chambre de
Commerce
du Canada

BUSINESSEUROPE



FKI THE FEDERATION OF KOREAN INDUSTRIES

GIPC
GLOBAL INNOVATION POLICY CENTER

¹ The latest COVAX supply forecast is available [here](#).

Cc:

Dr. Tedros Adhanom Ghebreyesus, Director-General, World Health Organization

Dr. Bright Okogu, Chief of Staff, Office of the Director-General, World Trade Organization

Antony Taubman, Director, Intellectual Property Division of the World Trade Organization

Richard Hatchett, Chief Executive Officer, Coalition for Epidemic Preparedness Innovations

Seth Berkley, Chief Executive Officer, Gavi, the Vaccine Alliance

Christopher Ruggerio, Senior Legal Officer

Luisa Santos, BusinessEurope

Mark Agnew, Canadian Chamber of Commerce

Sowon Lee, The Federation of Korean Industries

Robert Grant, U.S. Chamber of Commerce, Global Innovation Policy Center

Brian Robert Lowry, U.S. Council for International Business