Dear World Bank team,

We greatly appreciate the opportunity to review the White Paper and provide feedback. Please find PSI’s comments and suggestions below:

- Rather than setting the FIF up as a donor-recipient fund (i.e., from G20 to LMICs), why not adopting a model whereby “all countries contribute, all countries decide, and all countries benefit”, with a clear contributionrepresentation formula – after all, the whole world is affected by pandemics. This would allow for global buy-in and shared accountability, and it would supplement domestic investment.
- Consider making some contribution mandatory (as opposed to noting all financial commitments as voluntary), while allowing for additional contributions.
- Consider using a system already established with a platform capable of managing an earmarked finance fund.
- Governance – the proposed governance arrangements involve many layers, which raises concerns about how long it will take to get grants disbursed. Consider a nimbler structure, with a diverse board that has sufficient capacity to govern, oversee secretariate grant making, and provide technical direction. A model similar to the Global Fund (which is also a FIF) may be more adequate and would ensure that national and CSO voices are more clearly represented at the decision-making tables.
- Consider including GAVI and Global Fund as implementing entities.
- Operating modalities to support the private sector should absolutely be included, if not in grant-giving, then at least in partnership building and capacity building (training and infrastructure/equipment/supplies). This is critical to ensure inclusive surveillance and response from the full mixed health system.
- Clarify the criteria and process for engaging as an advisory board member.
- Clarify the criteria and process for an organization to obtain a World Bank policy waiver and be considered an eligible implementing entity.
- Clarify whether selected implementing entities will be allowed to contract other implementing organizations, such as international and local NGOs.
- Pitting inclusion against efficiency is a false choice.
- The proposed FIF should not be pit against funding for current epidemics (including HIV, TB and malaria).

Thank you in advance for considering our feedback as you further develop and strengthen this important financing mechanism for pandemic prevention, preparedness and response.

Kind regards,
Alex