

## Feedback on the white paper “A Proposed Financial Intermediary Fund (FIF) for Pandemic Prevention, Preparedness and Response Hosted by the World Bank”

**Submitted by**  
**Transparency International**  
**Global Health Programme**

1 June 2022

### Introduction

The Transparency International Global Health (TIGH) Programme would like to thank the World Bank for the opportunity to provide feedback on the above white paper. Contact details are at the end of this document if you would like to discuss any of the points made here.

### Feedback:

Section	Page no.	Concerned sentence	Recommendation from TIGH
<b>I. Background, Objectives and Potential Value Added</b>			
5	3	“Second, financing from the FIF could be used to <b>incentivize</b> countries to invest more in PPR, including through blending of MDB resources to further increase concessionality and matching of domestic resources.”	<p>Many health systems are under resourced, and the COVID-19 pandemic has exacerbated this. <b>A careful balance needs to be struck between investment in routine health services and pandemic preparedness.</b> To avoid the risk that LMICs feel pressured into matching funds, <b>financing from the FIF should include strong engagement with LMIC governments and civil society.</b></p> <p>Leading up to this engagement, <b>LMIC governments should also be encouraged to engage with and include civil society</b> in national planning and prioritization of routine health and PPR budgets.</p>
5	3	“Third, the FIF would offer the flexibility to work through the	When would this be decided? When a pandemic “hits” there won’t be

		World Bank, MDBs, WHO and other UN agencies, and potentially other implementing entities, drawing on the comparative advantages of key institutions in the global health system and supporting PPR needs that will continue to evolve. “	time for months of negotiation on who should manage the funds for the response. There is a <b>need for a clear and transparent mechanism agreed upon ahead of time which guides which institution or agency the funds will be channeled through.</b>
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5	3	“Fifth, by offering flexibility to mobilize non-ODA resources, including from philanthropies, the FIF could help bring further additionality in financial resources, expanding the pool of funding available for PPR.“	Given the size of the FIF, this could risk creating a monopoly of funding for PPR, competing directly with NGOs and civil society who provide urgent support in areas which are not prioritized for political reasons or neglect. This risks even further limiting the space for civil society. <b>Recommend that the WB FIF for PPR is not able to mobilize non-ODA resources unless funded by governments or clearly indicated that it is not competing with other already existing funds or funding mechanisms for this.</b>
II. Focus Areas for Financing			
9	4	“Strengthen country-level PPR capacity by plugging capacity and capability gaps at country and local level in core domains listed by the International Health Regulations (2005) and the OIE International Standards, including: 1) disease surveillance; 2) laboratory systems; 3) emergency communication and management; 4) community engagement. Needs will be contextual and country-specific, and financing priorities would be based on country-driven assessment and coordination efforts and guided by the plans and priorities of beneficiaries and One Health principles.“	<b>Requires clear and transparent mechanisms for how the individuals tasked to make these assessments are assigned.</b> Need to be a diverse group with guaranteed representation by for example gender, priority and vulnerable groups.
9	5	“TA, analytics, learning and convening: Financial support to	Since this is outside of the expertise of the World Bank, <b>transparent</b>

		countries and regional/global institutions should be complemented by activities to elevate the PPR agenda, support cross-country learning, and promote collective accountability. This could include peer-to-peer learning, learning events, targeted technical assistance, systematic monitoring of PPR capacities and domestic spending on PPR, etc.“	<b>mechanisms for identifying who and how this will be implemented need to be articulated.</b>
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<b>III. Proposed Organizational Structure and Design Features</b>			
10	5	“It is proposed that in its initial phase, the implementing entities for this proposed FIF include MDBs engaged in PPR, the WHO, and other relevant UN agencies. However, other entities could be included, should the FIF’s founding donors so determine.“	In order to strengthen national capacity and systems and the public’s trust in systems long-term and help prevent and increase the effectiveness to future pandemics, there is a need to <b>ensure that national governments govern the implementation of FIF funded activities.</b> These may start low and gradually increase, but it is critical that national governments are able to be in-charge and lead implementation within their borders.
<b>IV. Governance</b>			
13	6	“The governance framework would be designed and negotiated among the FIF’s founding donors, implementing entities and the World Bank, and endorsed by the governing board, so that it is in place when the FIF is opened for business”	1. Under this current version of the proposed framework, the primary beneficiaries of the FIF funding, LMICs, would not be involved, have any insight or say in how the funds are being allocated, through which mechanisms etc. There is a need to <b>include beneficiaries of the FIF funding in the governance framework.</b> This could also enable regional learning and applicability by making sure a country in the region is reviewing a proposal for funding for another country in the same region.

			<ol style="list-style-type: none"> <li>1. Articulate that there will be <b>clear and transparent mechanisms put in place for how individuals will be identified</b> to represent their entity in the governance framework, ensuring diversity including gender, vulnerable groups, FIF beneficiaries etc.</li> <li>2. Articulate that there will be <b>clear and transparent mechanisms put in place for how priority areas for funding</b> (geographic and technical) will be identified.</li> </ol>
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14	6	“The composition of the governing board of the proposed FIF, the roles/responsibilities of members, the preferred decision-making process, and how to ensure that the governing board will be appropriately informed by technical expertise, are matters that would ultimately be decided by the founding donors, drawing on input from a broad-based consultation process. Existing practices/arrangements followed by FIFs are illustrated below to indicate available options for the proposed FIF.”	This implies that the FIF donors will decide the future for LMICs with LMICs having no seat at the table. As articulated above, <b>LMICs need to be ensured representation in the governing board.</b>
19	7	“Further, the observer pool could be broadened out, as needed, to include other multilateral institutions, civil society organizations (CSOs) and/or the private sector.”	To ensure transparency and increase trust in the system and allocation of funds, <b>each sector supporting PPR at the global, regional and national level as well as the public should be able to observe with a clear justification for why voting rights would not be possible or pose a risk.</b>
<b>V. Operating Modalities, Reporting and Risk Management</b>			
26	10	“Eligible funding proposals would typically be reviewed, in detail, and assessed, by external technical experts (e.g., a technical advisory	<ol style="list-style-type: none"> <li>1. Need for <b>clear and transparent mechanisms for how the group of external technical experts are assigned.</b></li> </ol>

		panel), for the governing board’s final review and decision.”	2. <b>Frequently updated roster of the technical experts</b> to strengthen accountability and trust in the system and response.
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27	10	“The secretariat would track progress based on reports submitted by the implementing entities, and compile regular reports based on individual progress reports received from implementing entities during the reporting period.”	<b>Reports submitted by implementing entities should be frequently published and made available to the public</b> to strengthen accountability and trust in the use of the funds.
29	10	“Each implementing entity would be responsible for the management of risks associated with the respective projects and programs implemented by them, and reporting on such risks and mitigation measures, as appropriate, as part of its progress and results reporting.”	<b>Put in place standard and non-negotiable mechanisms for strengthening accountability and anti-corruption measures,</b> including: <ul style="list-style-type: none"> <li>- Requirements for <b>contracts to be tendered publicly</b>, and all <b>contract information made publicly available.</b></li> <li>- Projects and programs should be <b>independently audited</b>, with <b>results made publicly available.</b></li> <li>- Progress and results <b>reports</b> should be <b>publicly shared within a defined timeframe.</b></li> </ul>
31	11	“The proposed FIF would incorporate strong transparency and accountability criteria, with full buy-in from implementing entities where much of the monitoring and reporting burden would fall. In line with good practice, the FIF’s governance framework, operations manual, contribution agreements signed with contributors, financial procedures agreements signed with implementing entities, financial and progress reports, and other reviews and evaluations would be made publicly available”	<ol style="list-style-type: none"> <li>1. See above.</li> <li>2. In addition to the listed documents, any <b>contracts with medical treatment or supplies industry using funds from the FIF</b> should be required to <b>be made public</b> to ensure it is comparative and reasonable to other prices paid in the region and globally.</li> </ol>
<b>VI. Financing</b>			
32	11	“It is imperative that FIF financing be truly additional, and not merely take existing resources from other	<b>Standards and mechanisms for ensuring non-competition with existing development priorities</b> as

		important development priorities, and that it be sustained.”	well as their funding need to be put in place.
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34	11	“For the sake of simplicity and to get the new FIF off the ground as quickly as possible, it is proposed that the FIF be set up on a grants-in/grants-out basis...Grants can provide fully concessional project financing or concessional boosts to other instruments in the implementing entities’ toolkits (e.g., core lending in the case of the MDBs). In some cases, grants are also used to encourage complementary funding, in which implementing entities mobilize additional resources from other sources to be used alongside grant funding from the FIF.”	Project financing such as the one indicated here, risks introducing donors in effect earmarking funds for particular countries or projects for political reasons. <b>Clear standards and mechanisms need to be put in place under what unique circumstances for funding will be allowed.</b>
VII. Questions for Feedback and Next Steps			
N/A	N/A	HIC accountability and PPR as a true global public good	<p>How does the FIF mitigate the issues around HICs showcasing “pandemic response nationalism” as seen with the COVID-19 vaccines and procuring supplies and medicines to cover their populations several times over before the populations in LMICs have even been covered once?</p> <p>It is important to consider the lessons learned from the COVID-19 pandemic, and look at how the FIF can be used to enhance and ensure global equity. <b>Consider how the FIF can make strategic use of mechanisms such as pooled procurement, and framework contracts to rebalance markets,</b> and enhance equitable access to goods, such as PPE and medicines in pandemics.</p>

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