

**Comments on the World Bank's White Paper entitled "A Proposed Financial Intermediary Fund (FIF) for Pandemic Prevention, Preparedness and Response Hosted by the World Bank" from May 17<sup>th</sup>, 2022**

The German government welcomes the World Bank's draft proposal for a Financial Intermediary Fund (FIF) for Pandemic Prevention, Preparedness and Response (PPR) which is a comprehensive proposal on the objectives, the focus areas, the potential governance structure and decision-making process as well as the operating, reporting and financing modalities of the FIF. It provides an essential contribution to the discussions around the structure of this new FIF for PPR.

We support the goals of the proposed FIF which aim to close the gaps in the global PPR landscape in a sustainable manner, bearing in mind the need for complementarity with existing mechanisms. We believe in this regard that it is essential to build the FIF's support on the WB-WHO gap analysis. It is crucial that financing is additional to current ODA and that FIF incentivizes investments that are otherwise not supported. The One Health approach – including data on animal and environmental health – is a cross-cutting theme which should be considered in all of the Fund's activities.

We broadly agree with the proposed governance structure of the FIF including a Governing Board, a limited trustee and a limited secretariat at the World Bank which could be located in Geneva. However, also the role of WHO which we consider central, should be made clearer. Both, World Bank and WHO should be possible implementing organizations and members of the Governing Board (without voting rights). A strong role of WHO should be ensured by the election of a Board Chair associated to the WHO and the use of existing WHO instruments in FIF processes. Furthermore, we see an important role in a technical advisory board chaired by the WHO to provide evidence-based, technical and strategic advice to the Board and the Secretariat and to review Secretariat's recommendations in cases to be defined.

Obvious conflicts of interest in the various roles for the World Bank in the governance of the fund (Secretariat, Trustee, role at the Governing Board) and being implementing organization have to be analyzed and tasks, rights and responsibilities have to be clearly defined. This applies to a lesser extent also to the WHO. It is essential that accountability and transparency must be ensured.

Concerning the composition of the Board, donors and recipient countries should be represented in equal numbers with voting rights. To avoid conflict of interests, implementing entities can only be represented as observers in the Board.

We support the possibility to second staff from other organizations, e.g. WHO, to the secretariat. However, this decision should not be left to the secretariat alone, but also to the Governing Board.

We seek an inclusive approach and therefore note some uneasiness about the "founding donor" approach as it might alienate others. We would favor broader G20 participation, but also client country representation in the process of designing the fund as feasible. We would aim at collectively broadening the initial group of financiers.

Implementing Entities should not be limited to MDBs, IMF and UN organizations, but should include other health sector funds and, in some cases, regional and other implementing organizations.

Concerning the Questions for Feedback, we see an operation at regional level as the best chance for achieving results quickly. Furthermore, the regional level can support the closing of gaps at the national level as well as at the global level. An advantage of focusing on direct support at the national

level is a possible linkage to the mobilization of national budget resources. Moreover, gaps at the national level are known, while those at global level are more difficult to identify.