

Coalition for Preventing Pandemic at the Source (PPATS)

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Subject: Feedback on white paper from Preventing Pandemics at the Source

To: Consultations <consultations@worldbank.org>

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To whom it may concern,

The Coalition for Preventing Pandemic at the Source (PPATS) appreciates the opportunity to provide feedback on [the white paper](#) "A Proposed Financial Intermediary Fund (FIF) for Pandemic Prevention, Preparedness and Response Hosted by the World Bank".

Please see [the PPATS advisory note](#) on a global fund for pandemic prevention and preparedness with recommendations on governance, scope, size and so on.

Focus areas for FIF financing

It is imperative that the FIF includes support for capacity, policy and activities that help prevent the spillover of viruses, the leading driver of new outbreaks that become pandemics. Hence, we welcome the definition of "prevention" proposed on page 2 of the white paper, specifically that interventions are "needed to mitigate risk and reduce the likelihood or consequences of spillover events at the human, animal, or ecosystem interfaces". Unfortunately, section 2 on focus areas for financing does *not* mention any spillover prevention interventions. This is despite the fact that five of the six viral pandemics of the past 104 years are the result of confirmed spillover events (and the sixth one, COVID-19, was also most likely caused by spillover). This seems to be a fundamental inconsistency in the logic of the FIF.

We commend the mention of the "One Health principles" under focus areas for financing. However, the white paper currently lacks detail on what a One Health approach would entail when implemented. We urge moving beyond generic rhetoric on One Health to emphasizing specifically how One Health should be applied. The document makes note of the need for disease surveillance, however, surveillance alone does not prevent pandemics. Spillover prevention interventions must be explicitly stated, in line with the Independent Panel's [latest recommendations](#), which stress the following: "There is an urgent need also to reduce the likelihood of zoonotic spillover events upstream, which requires action to mitigate biodiversity loss and other ecosystem damage".

Funding spillover prevention interventions would be directly in line with the principle of complementarity and also filling gaps in current financing, which the white paper commendably mentions on page 4. Existing institutions that provide international financing for PPR and non-ODA resources currently disproportionately focus on pandemic preparedness and response which is critical but insufficient for reducing harm from future pandemics. This is critical because pandemic preparedness and response suffer from serious deficiencies (as we have seen tragically throughout the COVID-19 pandemic) including the following:

1. Risk of exacerbating inequity as those with socioeconomic privilege tend to have greater means to procure its benefits (e.g., vaccines, anti-viral treatments, PPE) long before others;
1. Insufficiency, as evidenced by failed COVID-19 efforts of many wealthy countries that have been investing in pandemic preparedness for decades;

1. Does not address ongoing “spillback”, which is one possible [theory](#) for how the Omicron variant of SARS-CoV-2 emerged, in which pathogens accrue mutations while moving back and forth between animals and people repeatedly;
1. Does not overcome human behavior in an age of disinformation, rising populism, rejection of science and polarization such as choosing to not receive a vaccine or wear a mask despite compelling evidence of their effectiveness.

Investing in spillover prevention, carries a [massive return on investment](#). Yet it is one of the most critical financing gaps in PPR. If the goal of the FIF is to minimize risk of harm from pandemics, it must help to fill this gap and adopt a layered approach that focuses on both prevention and preparedness.

More specifically, the fund should include support for the following five evidence-based actions to reduce the risk of spillover:

- The protection, conservation, and stewardship of tropical and subtropical forests with incentives, regulations, and improved enforcement measures
- Domestic and international bans or restrictions on commercial wildlife trade and markets that contribute to zoonotic spillover risk, particularly commercial trade in birds and mammals, while respecting the rights of Indigenous Peoples and local communities
- Strengthened veterinary care and biosecurity in animal husbandry
- Universal health care, particularly for communities living in emerging infectious disease hotspots, where risk of spillover is high
- Alternative livelihoods for people whose current livelihoods put them in contact with wildlife, whether intentional or not

To address ongoing gaps in funding for environmental conservation efforts such as those focused on deforestation, this new FIF for pandemics must coordinate its efforts with other funds such as the Global Environment Facility. It is important to recognize conservation is itself drastically underfunded. For instance, natural solutions (such as conservation of forests) represent more than one-third of the climate mitigation needed by 2030 to stabilize warming to well below 2°C. Yet these approaches receive less than 2% of global funds for climate mitigation. Furthermore, [the loss of primary tropical forest](#) was 12% higher in 2020 than in 2019, despite the economic downturn triggered by COVID-19. In short, administrators of the FIF must not assume that existing funds such as the GEF are dealing with the threat of spillover — they are not.

Governance

Beyond specifically funding the five priority actions mentioned above, the FIF should actively engage the three other UN agencies that make up the “[Quadripartite](#)” beyond the WHO as implementing entities: the Food and Agriculture Organization of the United Nations (FAO), the World Organization for Animal Health (OIE), and the UN Environment Programme (UNEP).

Furthermore, it is imperative that experts in spillover prevention be included in the governing body and technical body of the FIF.

Finally, to promote inclusivity and transparency, civil society organizations must be involved as representatives in the governing board and technical board.

Best regards,

Lina Dieudonné, on behalf of Preventing Pandemics at the Source

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Pronouns: she, her, hers