

Ms Hadja Lahbib
Commissioner for Preparedness
and Crisis Management; Equality
European Commission
Rue de la Loi 200

The Consumer Voice in Europe

B-1049 Brussels

BEUC-X-2024-108

Brussels, 01/12/2024

Subject: The Consumer Mission Letter

Dear Commissioner Lahbib,

On behalf of BEUC, The European Consumer Organisation, I wish to congratulate you on your recent appointment as European Commissioner Preparedness and Crisis Management, and on Equality. Created in 1962, we represent 44 national consumer groups from 31 European countries. Thanks to our members' markets watchdog role, their product testing and daily contacts with consumers from across Europe, we can support you with evidence-based recommendations to ensure the work of the European Commission delivers to consumers.

We fully support your mission to enhance the Union's capacity to better anticipate, prevent and prepare for crisis. We were pleased to hear references to climate change and antimicrobial resistance (AMR) during your European Parliament hearing and agree with you that they pose great risks to society. We welcome that the Commission will step up efforts to protect citizens against these and other threats by adopting an 'EU Preparedness Union Strategy' and an 'end-to-end' approach to medical countermeasures.

Consumer organisations can, and must be, part of this process. For you to be a true consumer champion, we believe that the below proposals should be part of your mission.

The current shortcomings

The COVID-19 pandemic shed light on the need to be better prepared to address public health crises. BEUC supports the initiatives implemented in the last few years on that front, such as extending the mandate of the European Medicines Agency and setting up the Health Emergency Preparedness and Response Authority (HERA). However, there are some shortcomings.

HERA does not have enough resources to meet sufficiently the needs and expectations concerning access to medical countermeasures. This undermines its capacity to play a bigger role in the development of antibiotics that are effective against drug-resistant bacteria, and for which there is little commercial interest. In addition, there is not enough coordination between the EU and Member States on stockpiling, which can undermine the protection of consumers against supply disruptions.

Consumers' proposals for your mission

Reinforce HERA's governance, mandate, and resources

We call on you to do everything in your hands to ensure that the next Multiannual Financial Framework allocates sufficient resources to crisis preparedness and response. **Reinforcing HERA's budget and governance** is necessary to protect consumers more effectively against cross-border health threats. In that regard, during the 2024-2029 Commission's mandate HERA should evolve into a more independent entity, with a greater scientific profile, and capacity to coordinate research efforts. It should also contribute more clearly to strengthening Member States' health systems, so they can better respond to health threats and ensure continuation of care during a crisis.

Step up efforts on antibiotic development and manufacturing

To **fill in the antibiotic innovation gap**, you should facilitate that HERA becomes an 'R&D coordinator' by deploying a scheme of push and pull incentives. This scheme should consist of research grants, milestone prizes, and joint procurement with a payment model that de-links revenues from sales volumes (**EU revenue guarantee system**).

In addition, HERA should follow up on the European Parliament's proposal to consider establishing European non-profit pharmaceutical undertakings that contribute to supply security in emergencies.¹ **Non-profit production** models are essential to ensure an end-to-end approach to medical countermeasures, particularly for those products for which there is less commercial interest.

Implement an all-encompassing EU stockpiling strategy

We welcome your plans to implement an **EU stockpiling strategy** and urge you to ensure that it focuses on two pillars. One, maximising the added value of the EU's own stocks for medical countermeasures (rescEU). Two, enhancing coordination among similar national initiatives and cooperation through the 'Voluntary Solidarity Mechanism'. A common approach to stockpiling will avoid unnecessary duplication of efforts and protect consumers equally from disruptions in the supply of crisis-relevant products.

¹ European Parliament, 2020. 'Report on the shortage of medicines – how to address an emerging problem' https://www.europarl.europa.eu/doceo/document/A-9-2020-0142_EN.html

Facilitate global access to medical countermeasures

We also call on you to help facilitate access to medical countermeasures at the global level. For example, by promoting **IP sharing and pooling** initiatives backed up by the World Health Organization. Reinforcing global cooperation is key to tackling cross-border health threats.

The way forward

We are aware that you have a busy agenda but hope nonetheless that you will find the time to meet with us. We would be keen to hear your reaction to our proposals and would like to elaborate more about the expectations of European consumers towards European decision-makers.

Please count on our support if you need information about the consumer perspective in your policy area.

Please find enclosed our priorities for this new Commission.

I wish you a most successful mandate.

Yours sincerely,

Agustín Reyna
BEUC Director General

Encl.: *Europe, Consumers Count on You – BEUC priorities for the next European Commission (2024-2029)*