November 17, 2021

Nicolas Palanque
Director, Multilateral Relations Division
Office of International Affairs for the Health Portfolio
Public Health Agency of Canada

Re: Canadian Medical Association input in advance of the World Health Assembly Special Session

Dear Mr. Palanque:

On behalf of the Canadian Medical Association (CMA), I am pleased to provide input to the Office of International Affairs for the Health Portfolio for consideration by the Canadian delegation in advance of the World Health Assembly (WHA) Special Session, taking place November 29-December 1, 2021.

Since 1867, the CMA has been the voice of Canada’s medical profession, representing physicians and medical learners from across the country. The CMA is dedicated to being a catalyst for impactful change in health, the health system and the health workforce.

Increasingly, the CMA is engaging with the work of the United Nations and other international organizations and welcomes the opportunity to provide input for consideration by the Canadian delegation to the WHA Special Session.

The CMA supports the recommendations of the Independent Panel for Pandemic Preparedness and Response (IPPPR). The recommendations identify and address major gaps in the global response to the COVID-19 pandemic. To this end, the CMA encourages the Government of Canada to participate in the global dialogue, led by the World Health Organization, the World Intellectual Property Organization, and the World Trade Organization, to identify and advance solutions to increase COVID-19 vaccine production and work towards ensuring equitable global distribution.

The CMA recognizes that equitable global vaccine access and distribution is a valuable public health tool, necessary to ensure that all countries meet their international obligations. As such, the CMA encourages the Government of Canada to support a temporary intellectual property (IP) waiver for COVID-19 vaccines and greater support for COVAX as important strategies to increase vaccine supply and distribution in low- and middle-income countries.

The CMA strongly supports the establishment of a new WHO convention, agreement or other international instrument on pandemic preparedness or strengthening existing frameworks to bolster global collaboration to ensure an effective global pandemic preparedness and response. An effective global pandemic preparedness and response framework includes a robust global surveillance system to support prevention...
by identifying diseases of zoonotic origin in all countries and improving alerts and independent, reliable, and accurate scientific communication.

Any such framework must be developed or strengthened in the spirit of solidarity and reciprocity, and prioritize global health equity, supported by clear, concrete deliverables. For example, there must be reciprocity mechanisms in place to:

- Expand the use of digital technologies for data collection and sharing;
- Make available pandemic-related health supplies as global public goods (without limitations imposed by the enforcement of intellectual property rights);
- Establish mechanisms to enable open access to technologies, including knowledge transfer, for scaling up the local manufacturing of pandemic-related health supplies;
- Coordinate the supply of vaccines and other health products to all countries;
- Lift unnecessary regulatory barriers for the market entry of generic manufacturers, by establishing abbreviated regulatory approval pathways for faster marketing approvals and promoting inter-agencies cooperation; and,
- Adopt measures to ensure the continued availability and affordability of vital medical supplies and equipment and other essential goods and services to meet basic needs, consistent with national requirements.

The CMA notes that any potential objectives achieved by developing a WHO convention, agreement, or other international instrument on pandemic preparedness and response are in large part already addressed by the current International Health Regulations (IHRs), which were unanimously approved upon their adoption. The CMA is concerned that the creation of a new convention, agreement, or instrument may face the same implementation challenges that have undermined or limited the effectiveness of the IHRs.

To achieve an effective global pandemic preparedness and response, whether it be through a new convention or other international instrument or through updating the IHRs, there needs to be a global financing system to allow all countries to meet their obligations as well as enforcement mechanisms so that regulations are binding. Adequate financing will be an important factor to enable low- and middle-income countries (LMICs) in their capacity to participate in an effective response. While enforcement poses a challenge for any issue of global concern, enforcement mechanisms could include financial incentives linked to the adoption of regulations and measures and model the peer-review system similar to the Convention on Nuclear Safety or WTO penalty system for non-compliance.
Finally, to ensure an adequate global financing system, the Government of Canada and other Member States may want to consider reframing any future pandemic threat as a global security issue, not only as a public health issue, by according the same import and funding as national security threats. By viewing any future pandemic threat through the lens of global security, pandemic preparedness and response can be elevated to the treatment of national security threats at the highest level of government decision-making and ensure a more coordinated preparation and response. Such a reframing would support the IPPPR’s recommendation to elevate the situation to the highest level of political leadership.

Once again, thank you for the opportunity to provide input for consideration by the Canadian delegation in advance of the WHA Special Session later this month. The CMA welcomes the opportunity for continued engagement with the Office of International Affairs for the Health Portfolio, including participating in the stakeholder call prior to the 150th WHO Executive Board Meeting in January 2022.

Sincerely,

Jeff Blackmer, MD, FRCPC
Executive Vice President, Global Health and Chief Medical Officer
Canadian Medical Association