Dear colleagues,

Refering to the discussion in the meeting from June 27 to July 1 Germany herewith provides for some additional remarks to the report about the meeting of the pandemic influenza preparedness framework advisory group (19 - 22 April 2016) to the Director-General. In terms of agreed transparency Germany welcomes a publication of these remarks on the website of the PIP Framework Review Secretariat.

Germany welcomes the recent report of the PIP Framework Advisory Group and the efforts of the group in the review process. As already mentioned in the meeting of June 27 to July 1 it is of importance to find clear and unambiguous wording in the field of complicated or very technical issues. For this reason Germany encourages the group to give particular attention to the wording in some of the chapters mentioned below.

@ no. 14, 15:

Germany fully supports the idea of increasing the communication and cooperation with the Member Countries with respect to the knowledge of the PIP framework on country level mentioned in no. 14 and 15. It is of crucial importance to ensure transparency and acceptance of the work done by the PIP framework in the Member Countries of the WHO as well as to use their experiences and their contribution to proceedings and activities of the framework. Also collaboration with the Global Influenza Surveillance and Response System and the WHO Collaborating Centres for Influenza can accelerate the process of improvement and ensure results that find a broad acceptance within the scientific community.

@ no. 21 and 26:

As mentioned before the commitments of benefit sharing offered by the vaccine producing companies are one of the main points influenzing the willingness of countries and institutions to provide the important data of the viruses (or not). The huge increase of data provided to the world community after the introduction of GISAID shows that the principle of protecting the user's rights in the data while offering extensive information at the same time is an aspect that may not be neglected.

Thus this aspect should be considered in current agreements as well as in the process of sharing information about the prequalification requirements with all influenza vaccine manufacturers not yet engaged in this process.

@no. 51, 53 and 54:

Germany agrees with the statement of the AG that rapid, timely and broad sharing of genetic sequence data (GSD) is important for an appropriate pandemic influenza preparedness and response. A diversity of databases that is described in no. 51 e) as "best for optimal data sharing and resilience" can indeed contribute to ensure these two factors. However the postulate of the AG in no. 53 (last bullet point in the left column) to have a redundancy of data in our point of view does not say the same. As already mentioned in the meeting in July 1 duplication of information and parallel systems should be avoided, as multiple databases might imply duplication of efforts. In our view it is important to value and profit from already existing structures and experiences of the established databases as for example GISAID which is the moreover used and valued in the field of research scientists, as mentioned in the Nature Journal (Nature 530, 129 (11 February 2016). Especially a development of SOP's for data providers and databases mentioned in no. 54 should be based hereon to avoid duplications or incongruities. Therefore in our point of view it is of crucial importance to integrate the creators and institutions responsible for the established databases into this process.

@ no. 56 and 57:

Germany supports the engagement of the Secretariat in analyzing the possible reasons for the decreasing trend in IVPP virus sharing. From our point of view also in this regard it is important to integrate the Member Countries into the discussion and to improve the information and communication flow with them to get all information collected which is necessary to ask the open questions.

Please be ensured that Germany is ready to contribute to the further proceedings and cooperation.

With best regards,

