

Brussels, 2 December 2025

Open letter: Civil society recommendations for protecting public interest and equitable access in compromise amendments to the Critical Medicines Act

Dear SANT Committee Members and Substitutes,

We, the undersigned civil society organizations working to defend and protect the right to health while promoting equitable access to medicines, welcome the EU's efforts to strengthen its pharmaceutical and health security frameworks, as proposed in the Critical Medicines Act¹. As the Union seeks to respond to increasing instances of medicine shortages, support strategic production, and secure access, it is essential that public interest, equity and human rights remain at the center of all policy decisions.

We call on the SANT committee to prioritize those measures that guarantee that every public investment translates into public benefit, and that no one is left behind, particularly in relation to the following items:

Guarantee public return on public investment (Art 15 and Art 16): Amendments 728, 739, 757, 770, 774, 780, 786, 797, 819.

Public funding must deliver concrete added public value. When financial incentives support strategic projects, binding access obligations should ensure not only availability but also affordability through equitable pricing, stockholding obligations in public procurement, and meaningful transparency.

A more robust EU transparency legislative and regulatory framework—covering R&D costs, production costs, public contributions, commercial terms and other key information and data—is indispensable to achieve fair pricing and strengthened democratic accountability. Transparency should be made effective for both regulators and for the public. The European Parliament legislative resolution on the proposal for the pharmaceutical legislation directive already stated the need for transparency regarding conditionalities in exchange for public financial support. The CMA provides a crucial opportunity to reinforce and advance this approach, ensuring coherence with the broader pharmaceutical package and its overarching public-interest objectives.

Strengthen collaborative procurement to improve affordability and supply security (Article 22 and Article 23): Amendments 1045, 1056, 1057

Joint procurement mechanisms are essential tools of proven effectiveness for increasing negotiating power, improving affordability, and ensuring timely and uninterrupted access to essential medicines. Their activation should be simple and flexible, allowing Member States to pool demand without unnecessary barriers. Strengthened and more frequent

¹ EUROPEAN COMMISSION Proposal for a Critical Medicines Act March 2025 Available at https://health.ec.europa.eu/publications/proposal-critical-medicines-act_en Accessed on 26th November 2025

use of diverse forms of collaborative procurement is particularly important for medicines with low or fragmented demand, where coordination is key to securing stable supply and fair prices.

Align EU pharmaceutical policy with global health commitments (Article 26 and Article 27: Amendments 1220, 1235)

The EU's approach to supply of critical medicines must align with its global health responsibilities and commitments. At a time when global health risks falling off the political agenda in terms of funding, visibility and political will, the EU should reaffirm leadership by making global health considerations integral to all its pharmaceutical policies. Partnerships with third countries should deliver mutual benefit and support local production capacity, technology and knowledge transfer, regulatory cooperation, and alignment with local public health needs. Strengthening manufacturing and health systems in partner countries is a pillar of global access and a prerequisite for delivering on the EU's global health commitments including Pandemic Prevention Preparedness and Response (PPR).

Conclusion

As the EU negotiates the framework that will shape access to critical medicines for the foreseeable future, we urge the SANT Committee to put people's health first in their deliberations and decisions. Transparency, strong public-interest conditionalities, fair pricing, equitable access and global justice are essential to building a resilient and equitable pharmaceutical system.

Signed,

Salud por Derecho

Médecins Sans Frontières

Health Action International

Aidsfonds

Global Health Advocates

Médecins du Monde France

BUKO Pharma-Kampagne

AIDS Action Europe

Wemos

Pharmaceutical Accountability Foundation

TB Europe Coalition

