

# Follow the Money

WHO's directing global health policy?





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Note that the figures in this report are all in US dollars.



Australian Medical Professionals' Society  
Unit 14-18, 17 Bowen Bridge Road,  
Bowen Hills, QLD 4006

# Contents

Introduction .....	4
Executive Summary .....	4
Aim .....	5
Method .....	5
Results .....	7
The WHO's funding arrangements.....	7
The WHO's donors .....	7
Pharmaceutical companies.....	8
Organisations .....	8
United Nations .....	16
Banks .....	18
Research institutions .....	19
Regional administrations.....	20
Other businesses.....	22
Other bodies.....	22
Inter-organisation relationships .....	23
Discussion .....	26
WHO's funding arrangements.....	26
Pharmaceutical companies.....	26
Organisational donors.....	27
Other donors .....	28
Donor networks .....	29
Philanthropic donors.....	29
WHO .....	30
Pharmaceutical industry and health .....	31
Conclusion .....	32
Recommendations.....	33
Appendix - Top-100 non-country donors to the WHO's voluntary donations - specified for 2022-23 .....	34
References.....	39

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## WHO's directing global health policy?

### Introduction

The Australian Government has endorsed two treaties developed by the World Health Organization that, together, will affect the health and wellbeing of the global population.

The first of these is the 2024 Amendments to the International Health Regulations (2005)<sup>1</sup> agreed to by Health Minister Mark Butler in June 2024. The second is the WHO Pandemic Agreement/Treaty<sup>2</sup>.

These treaties give the WHO unprecedented influence over key aspects of the population's health, leading to countries, such as Australia, enforcing medical testing; mandating pharmaceutical treatments, including gene therapies; declaring lockdowns and implementing travel restrictions.

Given the significant ramifications of these treaties for the health and wellbeing of Australians, the Australian Medical Professionals' Society (AMPS) undertook an independent investigation into the WHO, its funders and the beneficiaries of the WHO's decisions in order to determine whether the WHO is acting as an independent and impartial agency that can be trusted to protect public health.

This report presents the findings and considers the implications for the health of Australian and global populations.

### Executive Summary

The investigation by AMPS considered the potential for donors to the WHO to influence the Organization's decisions on global health policy. To do this, it considered the funding mechanisms of the WHO and the affiliations of the WHO's top-100 donors for specified purposes in 2022-2023 using data from the WHO's website.

Among the key points observed are the following.

- The WHO invites investors, offering 3,400% returns, and allows donors to its specified purposes program to have a say in how their funds are spent.
- The majority of the top-100 donors to the WHO's specified donations program were pharmaceutical companies or aligned with pharmaceutical interests.
- 100% pharmaceutical companies donated a total of \$28,722,232 directly to the WHO for specified purposes, contravening the WHO's Guidelines, as well as donating to other top-100 donors.



- 58 organisations donated a total of \$1,741,237,890 and 56 (96.5%) of these organisations were seen to be aligned with the interests of the pharmaceutical industry, receiving funds, cooperating on projects or promoting pharmaceutical products and expanding pharmaceutical markets.
- 100% UN agencies, which donated \$494,683,067, were linked to the pharmaceutical industry or engaged in pharmaceutical projects.
- 100% banks, which donated \$131,820,000, profited from pharmaceutical projects.
- 100% research institutes, which donated \$9,640,000, engaged in some way with the pharmaceutical industry.
- 100% regional administrations, which donated \$13,380,978, had useful links with the pharmaceutical industry.
- 100% non-pharmaceutical businesses, which donated \$9,418,000, had links with the pharmaceutical industry.
- 100% other bodies, which donated \$369,427,000, were connected with the pharmaceutical industry.
- There were connections between many of the top-100 donors that included cross-funding, collaboration, cross-staffing and links at governance levels.
- Hierarchies were identified in the inter-organisational relationships, with the Gates and Rockefeller family groups in key positions.
- The WHO's funding arrangements contravene its own Guidelines and create a conflict of interest for the Organization.
- Opportunities existed for donors to influence the WHO's activities, giving pharmaceutical interests significant influence over global health.

## Aim

The aim of this investigation was to consider the potential for donors to the WHO to influence the Organization's decisions on global health policy.

Specifically, it considered (a) aspects of the WHO's funding approach that could allow such influence to be exerted and (b) the affiliations and interests of the top-100 donors to the WHO's specified donations programme.

## Method

The WHO's funding arrangements were considered for their potential to allow donors to influence the Organization's decisions on global health policy.

An investigation into the WHO's donors was conducted to determine opportunities and likelihood for them to influence its decisions.

To do this, a list of the 2022-2023 financial contributors in the WHO's 'voluntary contributions – specified' category was accessed from the WHO's website at <https://open.who.int/2022-23/contributors/by-fund-types/vcs>.

This was the most recent funding information available from the WHO's website at the time of this investigation.

It lists donations that can be made for specified projects – in other words, projects that can be influenced by the donor.

This category of donations includes those from member nations, which were not considered in this analysis. The investigation did not consider in-kind donations, such as pharmaceuticals, which would have increased the monetary value of the donations the WHO received.

After excluding member nation donors and in-kind donors, a total of 253 donors for specified projects was identified.

This investigation aimed to examine the top 100 of these donors.

Four donors were eliminated from this list due to lack of meaningful information (see shaded lines in Appendix table). They were:

- Pre-qualification Fees (charged by the WHO to evaluate vaccines)
- Miscellaneous Fees for International Nonproprietary Names (INN) (fees charged by WHO for product names)
- Others
- and Miscellaneous Healthy Cities (not specified).

The gap was filled by the next four viable donors on the WHO's donor list<sup>1</sup>:

- Bernard van Leer Foundation
- Alliance for Public Health, Ukraine
- World Psychiatric Association
- Edmond J Safra Foundation.

The donors were considered to fall into the following categories:

- Pharmaceutical companies
- Organisations, including foundations, charities, associations and other organisations.
- United Nations agencies
- Banks
- Educational/research organisations
- Administrations of geographical regions
- and Other.

An investigation was undertaken into the affiliations of these bodies with commercial interests.

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<sup>1</sup> Crown Agents Services was omitted as it has shut down and information was not available, <https://www.devex.com/news/crown-agents-shuts-down-108075>

# Results

## The WHO's funding arrangements

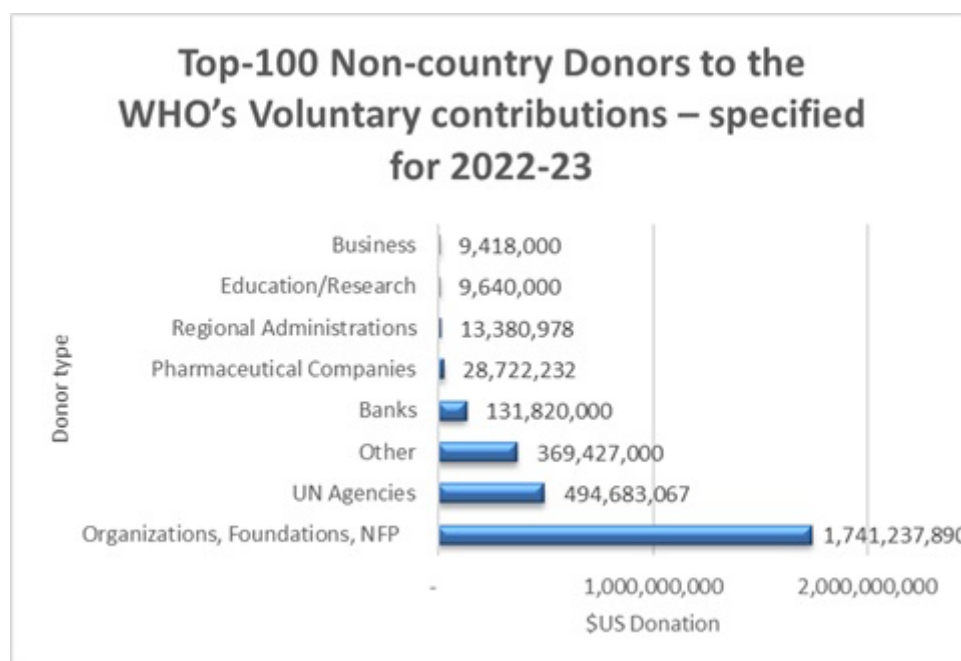
The investigation found that there are two aspects of the WHO's funding arrangements that are relevant to whether donors could influence the Organization's decisions on global health policy.

The first is the WHO's investment strategy.

The WHO solicits investors, offering a 3,400% return on investment. The WHO's website says, 'the quantifiable return on investment in WHO is very substantial.' And 'investing in WHO provides a return of at least US\$35 for every US\$1 invested.'<sup>3</sup>

The second aspect of the WHO's funding arrangement relevant to this investigation is that the WHO accepts donations for specified purposes – ie purposes determined by donors themselves.

Graph1 shows the voluntary donations made to the WHO in each category of top-100 non-country donors for specified purposes in 2022-2023.



Graph 1: Top-100 Non-country Donors to the WHO's Voluntary contributions – specified for 2022-23

## The WHO's donors

The results showed that nearly all of the top-100 contributors to the WHO's specified category of voluntary contributions were pharmaceutical companies or organisations that had interests compatible with the pharmaceutical industry.



## Pharmaceutical companies

The investigation showed that eight of the 100 top contributors to the WHO's specified category of voluntary contributions were pharmaceutical companies:

1. Sanofi-Aventis
2. Bayer AG
3. Merck Sharp and Dohme-Chibret
4. GlaxoSmithKline (GSK)
5. Richter Gedeon Vegyeszeti Gyar
6. Novartis
7. Eisai Co Ltd
8. Merck.

Together, these eight companies paid the WHO \$28,722,232 in specified donations.

Pharmaceutical companies also made donations to the top-100 organisations that donated to the WHO in 2022-2023, as shown subsequently.

Additionally, pharmaceutical companies were seen to be involved in shaping policy at an administrative level.

- Pfizer stated: 'We partner with EU policymakers and stakeholders'.<sup>4</sup>
- Referring to its activities in Africa, Novartis said, 'Novartis also will work to increase its clinical trial capabilities, and **accelerate regulatory and administrative processes in the region** to shorten the time between the development, approval and ultimately access to new medicines for patients across SSA.'<sup>5</sup>

## Organisations

The majority of the WHO's top-100 donors in this period could be broadly categorised as organisations and they included foundations, charities, associations and other organisations.

Together, these organisations donated \$1,741,237,890 to the WHO for specified purposes.

By far the largest donor was the Bill and Melinda Gates Foundation (\$829,502,000), followed by the GAVI Alliance, cofounded by the Bill and Melinda Gates Foundation (\$480,872,000). Together, these organisations donated 62.24% of the specified voluntary donations for that period.

It was observed that 56 of 58 (96.5%) these organisations had interests that aligned with the pharmaceutical industry to various extents. These ranged from support for pharmaceutical products to collaboration with pharmaceutical companies, investment in pharmaceutical companies and, sometimes, ownership of pharmaceutical companies. Some organisations had links with the pharmaceutical industry at a governance level.

The following examples are a snapshot of those observed but do not claim to depict the full picture.

### ***The Bill and Melinda Gates Foundation***

The Bill and Melinda Gates Foundation (now the Gates Foundation) invested in BioNTech, a partner of Pfizer, making a profit of \$260 million. It also invested in CureVac, an mRNA company, from which it made \$50 million.<sup>6</sup> It supports vaccination projects and has partnered with pharmaceutical companies eg by collaborating with Pfizer to increase access to its injectable contraceptive.<sup>7</sup>

The Foundation's website states, 'Our goal - To urgently reach children, adolescents, and adults in lower-income countries with the vaccines they need to live a life free from vaccine-preventable diseases.'<sup>8</sup>

Many of the Foundation's staff previously worked for pharmaceutical companies. Trevor Mundel, president of the Global Health Division, previously worked at Novartis, Pfizer and Parke-Davis. Yachi Yamada, previously in the same role, worked at GlaxoSmithKline. Kim Bush worked for Baxter International Healthcare Corporation, and Penny Heaton, Director of Vaccine Development, worked for Novartis and Merck.<sup>9</sup>

### ***GAVI The Vaccine Alliance***

GAVI The Vaccine Alliance describes itself as 'one of the world's largest financiers of vaccines, working closely with countries and manufacturers to shape the market for vaccines'<sup>10</sup> It has collaborated with pharmaceutical companies, including Janssen, GlaxoSmithKline, Merck, Sanofi Pasteur and Pfizer. It says, 'Since 2000, GAVI has immunised more than 325 million children in developing countries'.<sup>11</sup>

The International Federation of Pharmaceutical Manufacturers & Associations (IFPMA), which represents 55 pharmaceutical industries, has a seat on the Board of GAVI.<sup>12</sup>

### ***Rotary International***

Rotary has been involved in different vaccination projects and says it has 'led the charge by immunizing more than 2.5 billion children in 122 countries'.<sup>13</sup>

### ***The Global Fund to Fight AIDS, Tuberculosis and Malaria (GFATM)***

According to its website, 'The Global Fund invests more than US\$5 billion a year to defeat HIV, TB and malaria' for which it uses medications and vaccinations.<sup>14</sup> It lists Johnson&Johnson and Takeda as partners and collaborated with Pfizer, for example, to expand the use of its Paxlovid antiviral.<sup>15</sup>

### ***The Bloomberg Family Foundation***

The Foundation has donated funds to eradicating polio through vaccinations.<sup>16</sup> It also donated funds for 'a state-of-the-art research facility with the goal to treat and control malaria, develop a vaccine, and find new drug targets...'<sup>17</sup>

### ***National Philanthropic Trust***

This grant-making organisation supported pharmaceutical-related projects. In 2024, it supported The END Fund, which treats Neglected Tropical Diseases. 'In 2023 alone, the organization reported treating over 180 million people by mobilizing resources and delivering treatments through community efforts and collaborative coalitions with governments, local

nonprofits, and pharmaceutical and academic partnerships.’<sup>18</sup> It also supported the TREAT ASIA project which researches and provides pharmaceutical treatments for HIV and other diseases.<sup>19</sup>

### ***Asia Europe Foundation***

This intergovernmental organisation’s public health activities support antimicrobial resistance using immunization and antibiotics<sup>20</sup> and managing infections with immunisation and developing new antimicrobial agents.<sup>21</sup>

### ***Wellcome Trust***

The Trust was founded by pharmaceutical entrepreneur Sir Henry Wellcome. It has collaborated with pharmaceutical companies such as Pfizer,<sup>22</sup> GlaxoSmithKline,<sup>23</sup> and Merck Serono.<sup>24</sup> In 2024, the Wellcome Trust invested in Johnson & Johnson (\$260m), Novartis Pharmaceuticals (\$472m) and Roche (\$384m).<sup>25</sup>

### ***The WHO Foundation***

The WHO Foundation has responded to emergencies by supplying medicines and vaccines.<sup>26</sup>

Among the WHO Foundation’s members are Merck, Pfizer and the Sanofi Collective<sup>27</sup> and it has partnered with the biopharmaceutical company Boehringer Ingelheim.<sup>28</sup>

The CEO of the World Health Foundation is Anil Son who previously worked for the pharmaceutical company Viartis as head of global infectious diseases.<sup>29</sup>

### ***L’institut de France***

L’institut de France hosts the French Academy of Sciences. In 2021 the French Academy of Sciences awarded the ‘Grande Medaille’ to Hungarian biochemist and vaccine creator, Katalin Karikó, president of BioNTech.<sup>30</sup> In the same year, it recommended ‘Vaccination without further delay’ for Covid-19 in 2021.<sup>31</sup>

Chancellor of the Institute is Xavier Darcos, who chairs the Sanofi-Espoir Foundation,<sup>32</sup> set up by pharmaceutical company Sanofi.<sup>33</sup>

### ***Vital Strategies***

Vital Strategies enters into corporate relationships with pharmaceutical companies.<sup>34</sup> It sponsored ‘STREAM’ research on the effectiveness of tuberculosis drugs in cooperation with Janssen and Johnson&Johnson<sup>35</sup> and its project, Resolve to Save Lives, supports pharmaceutical medication (see below).

President of Vital Strategies, Mary-Ann Etiebet, formerly worked for Merck.<sup>36</sup>

### ***Resolve to Save Lives***

This project of Vital Strategies (above) supports access to pharmaceuticals, for example, for blood pressure.<sup>37</sup> Its project, ‘Epidemic-Ready Primary Health Care’ involves detecting and managing (treating) cases.<sup>38</sup>

### ***Children’s Investment Fund Foundation***

The foundation has collaborated with pharmaceutical companies to make contraceptives more widely available. For example, they helped broaden access to Pfizer’s injectable contraceptive medroxyprogesterone acetate.<sup>39</sup>



### ***Rockefeller Foundation***

The Rockefeller Foundation was founded by oil magnate John D Rockefeller whose business interests are linked with the pharmaceutical industry.

Rockefeller financial services company, Rockefeller Capital Management, has shares in pharmaceutical companies, including Pfizer, Johnson&Johnson, Abbvie, Eli Lilly & Co, Abbott Laboratories, Novo Nordisk, Vertex, Regeneron Pharmaceuticals, Jazz Pharmaceuticals, Bristol Myers Squibb and Merck & Co.<sup>40</sup>

It also has shares in Vanguard Group and BlackRock.<sup>41</sup>

Vanguard and Blackrock both have shares in Pfizer,<sup>42</sup> Moderna,<sup>43</sup> AstraZeneca,<sup>44</sup> Johnson&Johnson<sup>45</sup> and Novovax.<sup>46</sup>

The ‘Rockefeller empire, in tandem with Chase Manhattan Bank (now JP Morgan Chase), owns over half of the pharmaceutical interests in the United States. It is the largest drug manufacturing combine in the world.’<sup>47</sup>

### ***The Novo Nordisk Foundation Initiative for Vaccines and Immunity (NIVI)***

The Foundation owns the pharmaceutical company Novo Nordisk A/S<sup>48</sup> and aims to treat disease with pharmaceuticals.

### ***Carter Center***

Among the Center’s partners are Merck, Pfizer and Abbott.<sup>49</sup> It has partnered with Merck to deliver the pharmaceutical drug Mectizan for blindness and skin diseases in Africa and the Americas.<sup>50</sup>

### ***The Sasakawa Health Foundation***

The Sasakawa Health Foundation was co-founded by a pharmacologist who developed a drug treatment for leprosy.<sup>51</sup> Among its donors is pharmaceutical company Novartis.<sup>52</sup>

### ***United Nations Foundation***

The Foundation works with GAVI The Vaccine Alliance and its projects include delivery of vaccines, for example for malaria, polio, measles and rubella<sup>53</sup> and for Covid-19.<sup>54</sup>

Its partners include the pharmaceutical companies Merck, Pfizer and Bristol-Myers Squibb.<sup>55</sup>

### ***CDC Foundation***

The foundation is one of the core partners of GAVI The Vaccine Alliance which describes itself as ‘one of the world’s largest financiers of vaccines, working closely with countries and manufacturers to shape the market for vaccines’.<sup>56</sup>

In 2024 it received funds from pharmaceutical companies Abbott Laboratories, Pfizer, Merck Sharp & Dohme and AstraZeneca PLC.<sup>57</sup>

### ***Fondation Botnar (FB)***

In 2023, Fondation Botnar awarded \$250,000 to Helex, an Indian company, for Developing gene therapies for rare genetic diseases.<sup>58</sup> It funded the Basel Research Centre for Child Health,

which launched the Fast-Track Call: COVID-19 Research in 2020 which ‘developed new technology to detect SARS-CoV-2, investigated new COVID-19 therapies, identified risk factors for severe COVID-19 and designed modelling methods to predict disease spread and virus evolution.’<sup>59</sup>

### ***The King Baudouin Foundation***

The King Baudouin Foundation United States set up the ‘vaccine for everyone’ campaign.<sup>60</sup>

### ***The IKEA Foundation***

The foundation supported vaccination for Covid-19, saying, ‘the IKEA Foundation aims to cement public confidence in COVID-19 vaccines and rally funding for fair global vaccine distribution’.<sup>61</sup>

### ***Global Disability Innovation Hub***

Its focus is assistive technology. It launched [www.InnovationAction.com](http://www.InnovationAction.com), ‘a new innovation platform to provide global access to viable medical and protective equipment designs’.<sup>62</sup>

Former CEO, Pascal Bijleveld, previously worked at GAVI The Vaccine Alliance.<sup>63</sup>

### ***The AO Foundation***

The Foundation’s website says, “For more than 60 years, the AO Foundation has partnered with the Orthopedic sector of Johnson & Johnson MedTech’.<sup>64</sup>

### ***Helmsley Charitable Trust***

The Trust funds programs that promote pharmaceutical treatments, such as developing treatments for Crohn’s Disease<sup>65</sup> and providing medication for type 1 diabetes.<sup>66</sup>

It provided \$3.3million to support the IBD Qorus health program, in collaboration with pharmaceutical companies AbbVie, Janssen, Luitpold Pharmaceuticals, Inc., Pfizer, Inc., and Takeda Pharmaceuticals U.S.A.<sup>67</sup>

### ***Bridges to Development***

This not-for-profit organisation has partners that include pharmaceutical companies Medicines Development for Global Health, Janssen, Merck Global Health and Takeda Pharmaceutical Company.<sup>68</sup> It has also partnered with GAVI The Vaccine Alliance.<sup>69</sup>

### ***Fondazione Telecom Italia***

In 2025 it offered grants for biomedical research to ‘promote increasingly personalized and technologically advanced diagnosis, prevention and treatment’.<sup>70</sup>

### ***Foundation for Innovative New Diagnostics (FIND)***

This Swiss not-for-profit develops diagnostic tests for disease.<sup>71</sup>

It is a member of The Access to COVID-19 Tools (ACT) Accelerator, with the Bill & Melinda Gates Foundation, CEPI, GAVI The Vaccine Alliance, The Global Fund, Unitaaid, Wellcome, the WHO, and the World Bank. According to the WHO, ‘These organizations have joined forces to speed up an end to the pandemic by supporting the development and equitable distribution of the tests, treatments and vaccines’.<sup>72</sup>

### ***The LEGO Foundation***

The Foundation donated \$150 million to COVID-19 relief, including \$70 million for access to vaccines and health supplies.<sup>73</sup>

LEGO Group's holding and investment company KIRKBI has invested \$40mill US in biotech firm Kerecis<sup>74</sup> and has a partnership with pharmaceutical company Novo Nordisk.<sup>75</sup>

### ***The Pan American Health Organization (PAHO)***

PAHO encourages vaccination<sup>76</sup> and supports vaccination projects, such as the introduction of pneumococcal vaccine in Cuba in 2024 in association with GAVI The Vaccine Alliance.<sup>77</sup>

### ***Lions Clubs International Foundation (LCIF)***

The foundation has contributed to projects to fund access to vaccines for a range of conditions, including measles and rubella.<sup>78</sup>

An LCIF media release states 'LCIF has committed to raising US\$30 million to improve access to vaccines through the GAVI Alliance. ... Lions will play a key role in social-mobilization efforts in GAVI-supported vaccination campaigns.'<sup>79</sup>

### ***Clinton Health Access Initiative (CHAI)***

The Clinton Health Access Initiative has supported Chinese pharmaceutical manufacturers to participate in the global market.<sup>80</sup>

### ***Sightsavers***

This charity was involved in delivering 'treatments' for tropical diseases to 47 million people and 'preventative medication for five NTDs [neglected tropical diseases] and treat more than 60 million people from a parasitic infection (onchocerciasis).<sup>81</sup>

It obtained donations from Merck valued at £226,492,000 in 2023.<sup>82</sup>

### ***The Task Force for Global Health***

According to its website, 'The Task Force is contributing to global efforts to eliminate diseases, ensure access to vaccines and other life-saving medicine'. Its projects include those diseases with pharmaceutical solutions and the project 'Voices for Vaccines'.<sup>83</sup> It has received funding from and collaborated with Pfizer.<sup>84</sup>

It has received pharmaceuticals from Merck,<sup>85</sup> partnered with Bayer<sup>86</sup> and partnered with GSK & Johnson & Johnson.<sup>87</sup>

### ***International Development Law Organization***

It supports a law-based response to problems areas such as vulnerable groups and public health emergencies so that people have access to 'vaccines and other medical measures'.<sup>88</sup>

Its Director General has spoken in favour of universal vaccination.<sup>89</sup>

### ***New Venture Fund (NVF)***

The New Venture Fund puts funders in touch with projects for addressing malaria, HIV, TB, pneumonia and vaccine delivery.<sup>90</sup>



### ***The Korean Foundation for International Healthcare – Dr Lee Jong-Wook Memorial Fund (KOFIH)***

The Foundation lists ‘vaccine support’ among its activities and this included delivery of medical supplies for Covid-19 in Romania.<sup>91</sup>

The fund is named after Dr Lee Jong-Wook, formerly director of the WHO’s global programme for vaccines and immunisation.<sup>92</sup>

### ***World Vision International***

The charity lists the Pfizer Foundation among its corporate partners.<sup>93</sup> It collaborated with GAVI The Vaccine Alliance in the RAISE 4 Sahel project aimed at vaccinating children.<sup>94</sup>

### ***Fundaci n Anesvad***

The Anesvad Foundation provides research and treatment for neglected tropical diseases such as skin related Buruli ulcer, leprosy, yaws or lymphatic filariasis,<sup>95</sup> conditions that are generally treated with pharmaceuticals.

### ***Hilfsaktion Noma e.V.***

The Noma Project addresses the gangrenous disease, noma, that can be treated with pharmaceutical and other methods.

### ***The David and Lucile Packard Foundation***

The Foundation provided \$12million in 2015 for over-the-counter birth control pharmaceuticals.<sup>96</sup> In 2021 it provided \$2.5million for Covid-19 support, including vaccinations.<sup>97</sup>

### ***Elhra***

Elhra has collaborated with pharmaceutical companies, for example to strengthen Mali's pharmaceutical sector.<sup>98</sup>

### ***The Program for Appropriate Technology in Health (PATH)***

PATH ‘has collaborated with biotechnology and pharmaceutical companies to support the development of vaccines ... and to help countries introduce vaccines for childhood illnesses...’<sup>99</sup> Its website says that it has contributed to ‘100s of millions of people immunized.’<sup>100</sup>

It also works with governments to obtain desired outcomes. ‘PATH works with governments to develop policies and regulations that provide frameworks to expand health product manufacturing and support local manufacturers to meet international quality standards.’<sup>101</sup>

### ***Christoffel-Blindenmission (Christian Blind Mission)***

The organisation says, ‘We support the procurement and distribution of essential medicines and medical supplies for eye health and we advocate for their availability in our countries of operation.’<sup>102</sup>

It also supports the elimination of neglected tropical diseases with pharmaceuticals.<sup>103</sup>

### ***The World Diabetes Foundation***

The Foundation was founded by pharmaceutical company Novo Nordisk.<sup>104</sup> It receives most of its funding from Novo Nordisk, which makes diabetes medications, as well as donations from the Novo Nordisk Foundation.<sup>105</sup>

### ***Swiss Philanthropy Foundation***

The Foundation manages funds for philanthropist donors.<sup>106</sup> Its Health Fund supported the vaccination of 6406 newborns.<sup>107</sup>

### ***Fondation d'Harcourt***

The Foundation provides services and treatment for mental health problems.

The 2022 Annual Report refers to the role of pharmaceuticals in mental health treatment.<sup>108</sup>

‘Regular home visits are a fundamental component of the Healthy Minds, Good Lives project, improving care services by assessing familial situations, strengthening family care systems, ensuring adherence to drug treatment plans, and providing psychoeducation activities.’

‘Non-adherence can also be attributed to other factors such as lack of understanding on how to take medicine and its benefits; side effects in form of allergic reactions; use of multiple drugs simultaneously, and alcohol abuse. I provide psychoeducation on the importance of following drug regimens regularly and their impact.’

‘Follow-up home visits by the community provider and participation in psychoeducational groups helped Jean understand the importance of keeping medical appointments and taking medication regularly.’

### ***The Fred Hollows Foundation***

The Foundation funded the Alina vision project in cooperation with Japanese pharmaceutical company ROHTO,<sup>109</sup> worked with Pfizer on the International Coalition for Trachoma control project<sup>110</sup> and with Novartis in Kenya.<sup>111</sup>

### ***World Organization for Animal Health (WOAH)***

The Organization develops international standards for veterinary products and develops manuals such as the ‘Manual of Diagnostic Tests and Vaccines for Terrestrial Animals’ and ‘Practical Guidelines for National Procurement of Veterinary Vaccines’ in order ‘to support its [the Organization’s] Members in the process of identifying and procuring quality assured veterinary vaccines. They also contribute to provide clear guidance on the information regarding the vaccines and the manufacturers required for the procurement process.’<sup>112</sup>

### ***Autism Speaks***

The organisation has collaborated with pharmaceutical companies such as Roche, Eli Lilly, Servier, Janssen, Pfizer and Vifor Pharma on research for autism medications.<sup>113</sup> The chief science office of Autism Speaks previously headed the autism research unit at Pfizer.<sup>114</sup>

### ***Guttmacher Institute***

This not-for-profit addresses reproductive and sexual health and abortion. It supports abortion rights, including access to medical abortion and medical (pharmaceutical) contraception.<sup>115</sup> It supports global AIDS programs,<sup>116</sup> often treated with antiretroviral therapy (medications).<sup>117</sup>

### ***Pilipinas Shell Foundation (PSFI)***

This Foundation is the social arm of Shell companies in Philippines.

The Shell company has an involvement with the pharmaceutical industry. It sells olefins used for pharmaceuticals<sup>118</sup> and oils for use in adjuvants for vaccines.<sup>119</sup> It participated in a nation-wide Covid-19 vaccination program.<sup>120</sup> Additionally, the company website says, 'We provide a vast range of solutions to help pharmaceutical companies reduce carbon emissions'.<sup>121</sup>

### ***The Big Heart Foundation***

The Foundation offers services in 'Healthcare' that include 'provision of medicine and other health basic needs'.<sup>122</sup> This included, for example, funding a medical clinic in Kenya to provide vaccination programs and medical equipment<sup>123</sup> and vaccination programs in Pakistan.<sup>124</sup>

### ***The Bernard van Leer Foundation***

Provides services to support children and encourages immunisation.<sup>125</sup>

### ***Alliance for Public Health, Ukraine***

The Alliance is 'making a significant impact on the epidemics of HIV/AIDS, tuberculosis, viral hepatitis and other socially dangerous diseases in Ukraine'.<sup>126</sup>

It has received funding from pharmaceutical company Gilead for multiple projects.<sup>127</sup>

### ***The World Psychiatric Association (WPA)***

The WPA's Pharmacopsychiatry Section 'focuses on the important interface between psychiatry, medicine, and primary healthcare'.<sup>128</sup> It considers the effectiveness of drugs for mental health eg antipsychotics in the treatment of schizophrenia.<sup>129</sup>

### ***The Edmond J Safra Foundation***

The Foundation has partnered with the Michael J Fox Foundation to fund research and trials of drugs for Parkinson's Disease.<sup>130</sup>

## **United Nations**

This report shows that the United Nations had 15 agencies among the top-100 donors to the WHO, together donating \$494,683,067 for specified purposes. They were:

1. United Nations Central Emergency Response Fund (CERF)
2. United Nations Children's Fund (UNICEF)
3. UN Development Programme (UNDP)
4. UNITAID
5. United Nations Office for the Coordination of Humanitarian Affairs (UNOCHA)

6. United Nations Office for Project Services (UNOPS)
7. Joint United Nations Programme on HIV/AIDS (UNAIDS)
8. United Nations Population Fund (UNFPA)
9. United Nations Environment Programme (UNEP)
10. International Organization for Migration (IOM)
11. World Food Programme (WFP)
12. United Nations Entity for Gender Equality and the Empowerment of Women (UN Women)
13. United Nations Peace and Development Trust Fund (UNPDF)
14. Food and Agriculture Organization (FAO)
15. International Telecommunication Union (ITU).

All 15 (100%) of these agencies were involved in projects that utilised or promoted pharmaceutical products, including vaccines, and often collaborated with pharmaceutical companies. For example:

- CERF aimed to reach more than 2 million people with vaccines.<sup>131</sup>
- UNICEF aims at 'Reaching the unreached with life-saving vaccines'.<sup>132</sup> It signed an agreement with Pfizer for 4 million courses of the antiviral medicine nirmatrelvir/ritonavir (PAXLOVID™).<sup>133</sup> 'Merck entered into a collaboration with Gavi and UNICEF to supply its HPV vaccine in Gavi-eligible countries' and UNICEF collaborated with Merck to obtain HPV vaccines<sup>134</sup> and Mectizan for river blindness<sup>135</sup> and it obtained millions of tablets for pneumonia from Sandoz, a division of Novartis.<sup>136</sup>
- UNDP supported universal vaccination.<sup>137</sup>
- UNITAID supported vaccination with a GSK vaccine for malaria.
- UNOCHA reports a vaccination program in Lebanon for Covid-19 where '445,352 people have been vaccinated' and some population groups 'will receive AstraZeneca vaccine'.<sup>138</sup>
- UNOPS says it will work with GAVI The Vaccine Alliance to 'support vaccination efforts globally'.<sup>139</sup> In a \$3.28million project, it is working to 'help strengthen Ethiopia's capacity for local vaccine production'.<sup>140</sup>
- UNAIDS has a program to strengthen partnerships with the Global Business coalition. 'The Joint Programme has also built new partnerships across a variety of industry sectors such as the Sherpa pharmaceutical and diagnostic mechanism which fostered key commitments on the part of 17 companies (e.g. Abbott, Aspen, Gilead, GSK, Merck, Pfizer, Ranbaxy) to increase access to treatment...'<sup>141</sup>
- UNFPA includes pharmaceutical companies Bayer, Ferring, Organon, Reckitt (which created Indivior pharmaceuticals) and Takeda<sup>142</sup> and supports vaccination projects, such as for cervical cancer in Europe and Asia.<sup>143</sup>

- UNEP helps provide cool storage and transportation for pharmaceuticals and chemicals.<sup>144</sup>
- International Organization for Migration provides vaccination services. ‘Vaccination within PMHAs is provided for refugees and migrants both routinely and in response to outbreaks of vaccine-preventable diseases’.<sup>145</sup>
- The WPF is supported by Takeda pharmaceutical company.<sup>146</sup>
- UN Women supported Covid-19 vaccinations, including for women. It says, ‘it is essential that national vaccination strategies and policies are inclusive and non-discriminatory’.<sup>147</sup>
- The United Nations Peace and Development Trust Fund runs vaccination programs such as strengthening immunisation programmes and logistics in India.<sup>148</sup> It is funded by the People’s Republic of China. ‘Established in 2016, the United Nations Peace and Development Trust Fund (UNPDF) is funded by the Government of the People’s Republic of China that pledged \$200million dollars over a ten-year period. In September 2020, President Xi Jinping announced an additional five-year extension of the UNPDF until 2030’.<sup>149</sup>
- The Food and Agriculture Organization has an interest in pharmaceuticals, especially for livestock. It has produced a ‘Manual for the production of anthrax and blackleg vaccines’,<sup>150</sup> and a ‘Standing Committee on Prequalification of Vaccines against FAST diseases’.<sup>151</sup>
- International Telecommunication Union (ITU) is the UN agency for digital technologies which are being used in health projects in partnership with the pharmaceutical industry. For example, the ITU’s Be He@lthy, Be Mobile initiative is supported by the International Federation of Pharmaceutical Manufacturers and Associations (IFPMA), the Non-Communicable Disease (NCD) Alliance, Novartis, GSK and Sanofi.<sup>152</sup>

As shown previously, the UN Foundation also donated funds to the WHO for specified purposes.

## Banks

The WHO’s top-100 donors for specified projects included four banks, all (100%) of whom were shown to profit from the pharmaceutical industry:

1. The World Bank
2. The African Development Bank Group
3. The Asian Development Bank
4. The European Investment Bank.

These banks profited by lending funds to counties to purchase vaccines and by lending funds to pharmaceutical companies to develop/manufacture pharmaceuticals.

Together, these banks donated \$131,820,000 to the WHO for specified projects.

### ***The World Bank***

The World Bank has been described as ‘the largest single source of finance (loans) for health in low and middle income countries as well as a major player in the field of pharmaceuticals’.<sup>153</sup>

In 2021, it approved a \$500million loan ‘to strengthen Peru’s Vaccination Plan through the procurement of 40 million COVID-19 vaccines to vaccinate 20 million people’<sup>154</sup> and in 2020 it planned a \$12billion project to help poor and developing countries secure Covid-19 vaccines.<sup>155</sup>

In collaboration with Pfizer, it announced a funding arrangement to identify and plug gaps in the supply of pharmaceuticals.<sup>156</sup>

### ***The African Development Bank Group***

The African Development Bank Group, is a key supporter of the pharmaceutical industry, stating that ‘the pharmaceutical industry sector is highly prioritized’. It developed the *2030 Continental Pharmaceutical and Vaccine Manufacturing Vision and Action Plan* which aims to increase the manufacturing of vaccines in Africa. ‘AfDB is considering investing up to \$3.1 billion through to 2030 in support of the vision,’ the plan says.<sup>157</sup>

### ***The Asian Development Bank***

The Asian Development Bank has provided loans to pharmaceutical companies to develop and distribute pharmaceutical drugs. These include improving manufacture in the Beijing–Tianjin–Hebei pharmaceutical hub and a loan to Jointown Pharmaceutical Group Co. Ltd. to ‘ensure a steady supply of essential medicines and personal protective equipment, including protective clothing, gloves, goggles, face masks, and respirators, to health workers.’<sup>158</sup>

### ***The European Investment Bank***

The European Investment Bank provided funding to pharmaceutical companies to help develop new pharmaceuticals<sup>159</sup> and to expand their businesses.<sup>160</sup>

## **Research institutions**

There were four educational/research institutions among the WHO’s top-100 donors which, together, donated \$9,640,000 to the WHO. They were:

1. St.Jude Children’s Research Hospital
2. the Robert Kock Institute
3. Zhongshan Ophthalmic Center
4. the International Development Research Centre (IDRC).

All four of these institutions are involved in pro-pharmaceutical activities that include vaccination and/or vaccine manufacturing or have pharmaceutical companies among their members.

### ***St.Jude Children’s Research Hospital***

St Jude’s says ‘Our vision is to be a premier academic department in pharmacy and pharmaceutical sciences, encompassing clinical pharmaceutical care and research. It has three pharmaceutical divisions: the Division of Pharmaceutical Sciences (focusing on



research), the Division of Pharmaceutical Services (focusing on clinical care) and a Clinical Pharmacokinetics and Therapeutic Drug Monitoring Laboratory.<sup>161</sup>

St Jude's Dr. Jiyang Yu, from the Department of Computational Biology, previously worked at Pfizer Oncology.<sup>162</sup>

St Jude's has worked in cooperation with pharmaceutical companies, for example, a study on HPV vaccination rates was supported by Merck Sharp & Dohme Corp<sup>163</sup> and it partnered with Blue Water Vaccines to develop a Streptococcus Pneumoniae vaccine.<sup>164</sup>

### ***The Robert Koch Institute (RKI)***

This is a German govt agency responsible for disease control and prevention. It has seven units, including those for the pharmaceutical related topics:

- Immunization
- HIV/AIDS, STI and Blood-borne Infections
- Gastrointestinal Infections, Zoonoses and Tropical Infections
- Respiratory Infections
- Healthcare-associated Infection.<sup>165</sup>

### ***Zhongshan Ophthalmic Center***

This is a WHO Collaborating Centre. Its members include Bayer, Johnson&Johnson, Roche, Abbvie, Amgen (a biotech company) and Astellas Pharma.<sup>166</sup>

### ***The International Development Research Centre (IDRC)***

The IDRC was established by the Canadian Government for research and innovation. It has vaccine related focus areas, including 'Challenges and opportunities for scaling vaccine manufacturing in Africa and Strengthening vaccine delivery and uptake in Africa.'<sup>167</sup>

## **Regional administrations**

The WHO also received specified donations from administrations in eight regional areas. These donations were separate from, and in addition to, funds contributed by the country or countries in which they are located. These regional administrations were:

1. Generalitat de Catalunya, Spain in addition to the donation by Spain
2. Government of Flanders, Belgium, in addition to the donation by Belgium
3. Macao, China (\$1,585k), in addition to the donation by China
4. The Southern African Development Community Secretariat (SADC) (1,403k), in addition to donation by South African countries
5. Seoul Metropolitan Government of the Republic of Korea, in addition to the donation by Korea
6. Economic Community of Central African States (ECCAS) in addition to the donation by African countries
7. Economic Research Institute for Asean & East Asia (ASEAN), in addition to the donation by Asian countries
8. La Metropole Grand Lyon, France in addition to the donation by France.

Together, these regions donated \$13,380,978 to the WHO in for specified purposes.

All eight (100%) of these regional administrations were shown to have useful links with the pharmaceutical industry.

### ***Generalitat de Catalunya***

Generalitat de Catalunya is home to a number of major pharmaceutical companies, including Novartis, Boehringer Ingelheim, Bayer, Roche, Sanofi, Braun, Merck, Towa Pharma and AstraZeneca.<sup>168</sup>

### ***Government of Flanders, Belgium***

Flanders is home to some of the world's leading pharmaceutical companies, including Janssen Pharmaceutica, UCB, and Galapagos.<sup>169</sup>

### ***Macao, China***

Macao 'is facilitating the global outreach of Chinese medicine products, because medicines recognized in Macao are more easily acknowledged in Portuguese-speaking countries due to "certain legal similarities".'<sup>170</sup>

### ***The Southern African Development Community Secretariat (SADC)***

The Southern African Development Community Secretariat received funds to support the manufacturing of medical and pharmaceutical products in the region.<sup>171</sup> According to SADC, 'The access and manufacturing of vaccines remain the key agenda in the 2021-2027 regional cooperation development framework.'<sup>172</sup>

### ***Seoul Metropolitan Government of the Republic of Korea***

Seoul is the home of Seoul Pharma Co Ltd, which manufactures and distributes pharmaceutical products.<sup>173</sup>

### ***Economic Community of Central African States (ECCAS)***

The Economic Research Institute for Asean & East Asia (ERIA) received funds from USA to purchase Covid-19 vaccines.<sup>174</sup> Senior Economist of EIRA, Dr Fauziah Zen, said that Covid-19 vaccines should be mandatory.<sup>175</sup>

### ***Economic Community of Central African States (ECCAS)***

African States are expected to benefit from activities of pharmaceutical companies. Pfizer and BioNTech arranged for African manufacturers to "fill and finish" vaccines – ie complete the final stage of vaccine manufacture.<sup>176</sup> Additionally, Merck Foundation, GSK and Novartis announced investments in Africa to supply pharmaceuticals and enhance African manufacturing. Merck committed to supply 115million doses of HPV vaccine.<sup>177 178 179</sup>

### ***La Metropole Grand Lyon, France***

Lyon has been described as 'one of the hotspots for biotech in Europe' and is home to many biotech companies, including Adocia, Poxel, MaaT Pharma, Enyo Pharm, Amoéba, Erytech, Fab'entech, Osivax, Theranexus and Alizé Pharma 3.<sup>180</sup>

## Other businesses

In the top-100 donors to the WHO were two businesses that were not pharmaceutical companies and, together, they contributed \$9,418,000 to the WHO for specified purposes.

Both of these companies (100%) had links or involvement with the pharmaceutical industry:

1. Kobe Group and
2. Palestine Telecommunications Company (Paltel Group).

### ***The Kobe Group***

This is a Japanese company specialising in electronic products, with a division in healthcare products.<sup>181</sup> It has a partnership with Merck ‘to accelerate the development and manufacturing of viral vector-based gene therapy applications’.<sup>182</sup>

### ***Palestine Telecommunications Company (Paltel Group)***

The company is related to Birzeit Pharmaceutical Company.<sup>183</sup>

## Other bodies

Two bodies outside the range of the aforementioned businesses and organisations also have strong links with pharmaceuticals/the pharmaceutical industry. They are:

1. The European Commission
2. Uppsala Monitoring Center.

Together these bodies donated \$369,427,000 to the WHO.

### ***European Commission (EC)***

The European Commission was the third largest non-country donor to the WHO, donating \$366,882,000 in specified funds.

The EC has a strong connection with the pharmaceutical industry and plays a role in the regulation of pharmaceuticals.<sup>184</sup>

It supports vaccinations which it describes as ‘the main tool for primary prevention of disease’.<sup>185</sup> It commissioned contracts for vaccines with pharmaceutical companies BioNTech-Pfizer<sup>186</sup> and Novavax.<sup>187</sup>

### ***Uppsala Monitoring Center***

The Uppsala Monitoring Centre is the WHO Collaborating Centre for International Drug Monitoring and is involved in promoting the safety of vaccines and medication.

Its catch phrase is ‘Safer use of medicines and vaccines for everyone everywhere’. Its activities include developing tools for pharmacovigilance, obtaining information from pharmaceutical companies, improving communications in the pharmacovigilance global network, publishing reports on pharmacovigilance and maintaining the WHODrug portfolio. Members ‘share the vision of safer use of medicines and vaccines, and work nationally and collaborate internationally to monitor the safety of medicines’.<sup>188</sup>

## Inter-organisation relationships

The investigation showed close relationships between the top-100 WHO donors considered in this report.

### 1. Some of the top-100 donors set up other top-100 donors.

- The WHO, UNICEF and Bill and Melinda Gates Foundation established GAVI The Vaccine Alliance.<sup>189</sup>
- Vital Strategies established Resolve to Save Lives.<sup>190</sup>

### 2. Some of the top-100 donors also partnered with or donated funds to other top-100 donors to the WHO.

- GAVI The Vaccine Alliance received funds/support from the Gates Foundation, Rockefeller Foundation, Children's Investment Fund Foundation, the WHO Foundation, WHO, UNICEF and the World Bank.<sup>191</sup>
- The United Nations Office for Project Services is 'one of the World Bank's most important UN partners.'<sup>192</sup>
- The Carter Center's partners include Merck, the Bill & Melinda Gates Foundation, the CDC Foundation, GSK, the Lions Clubs International Foundation, Pfizer, the World Bank, Task Force for Global Health, UNICEF and WHO.<sup>193</sup>
- The CDC Foundation received funds from the Bill & Melinda Gates Foundation, GAVI The Vaccine Alliance, Bloomberg, the Vanguard Group and Pfizer.<sup>194</sup>
- The UN International Organization for Migration received funds from the European Commission, the UN Central Emergency Response fund, UN Food and Agriculture Organization, GAVI The Vaccine Alliance, the International Telecommunication Union, UNICEF, UN Development Programme, UN Environment Programme, UN Population Fund, UN Women, World Food Programme, WHO, the Global Fund to Fight AIDS, Tuberculosis and Malaria as well as in-kind donations from many donors.<sup>195</sup>
- Bridges to Development collaborated with the Bill & Melinda Gates Foundation, Merck Global Health, Sightsavers, the Wellcome Trust and WHO.<sup>196</sup>
- UN Women received funding from Bill & Melinda Gates Foundation, the Children's Investment Fund Foundation, the Global Fund, African Development Bank and the Fred Hollows Foundation.<sup>197</sup>
- The UN Foundation's partners include the pharmaceutical companies Merck, Wellcome Trust, David and Lucile Packard Foundation, Children's Investment Fund Foundation, National Philanthropic Trust, Bloomberg Philanthropies and Rockefeller Foundation.<sup>198</sup>

- PATH is supported by the Bill and Melinda Gates Foundation and the David and Lucile Packard Foundation.<sup>199</sup>
- Elrha is supported by Wellcome.<sup>200</sup>
- Vital Strategies is supported by the Pan American Health Organization (PAHO), PATH, UNICEF Indonesia, the World Bank, the WHO<sup>201</sup> and the Bill and Melinda Gates Foundation.

### **3. Some of the top-100 donors shared personnel at a top administrative or governance level.**

- Mark Suzman, CEO of the Bill and Melinda Gates Foundation, formerly worked for the UN Development Program.<sup>202</sup>
- UNICEF is one of the four permanent members on the board of GAVI The Vaccine Alliance.<sup>203</sup>
- Pradip Shah, a former consultant to the World Bank, became chairman of Pfizer India.<sup>204</sup>
- Mary-Ann Etiebet, President of Vital Strategies, previously worked for Merck,<sup>205</sup> and was on the World Bank's Global Financing Facility Investors Group, the World Health Organization's Partnership for Maternal, Newborn and Child Health and the United Nations Population Fund High-Level Commission.<sup>206</sup>
- Peter Sands, CEO of the Global Fund to Fight AIDS, Tuberculosis and Malaria, formerly chaired the World Bank's International Working Group on financing preparedness.<sup>207</sup>
- Anil Soni, CEO of the WHO Foundation, was head of global infectious diseases at pharmaceutical company Viatrix and helped build the Global Fund and Clinton Health Access Initiative.<sup>208</sup>
- Dr. Rajiv J. Shah, CEO of the Rockefeller Foundation, previously worked for the Bill & Melinda Gates Foundation.<sup>209</sup>
- Pascal Bijleveld worked as CEO of the Global Disability Hub, as Director of Country Support at GAVI The Vaccine Alliance, as head of the Reproductive unit at UNICEF, for Clinton Health Access, for WHO and helped launch the Global Fund to Fight AIDS, TB & Malaria.<sup>210</sup>
- Julie Jacobson, Managing Partner and Co-Founder at Bridges to Development, worked at Bill & Melinda Gates Foundation, GAVI The Vaccine Alliance and PATH.<sup>211</sup>

The results also showed that hierarchies existed in the inter-organisational relationships identified in this report. They showed that a number of key families donated money to the WHO directly and through multiple channels indirectly, as can be seen in Figure 1.

Figure 1 shows that the Rockefeller group donated directly to the WHO. It also donated to organisations and pharmaceutical companies that donated directly to the WHO, including some who donated to other entities that donated to the WHO.

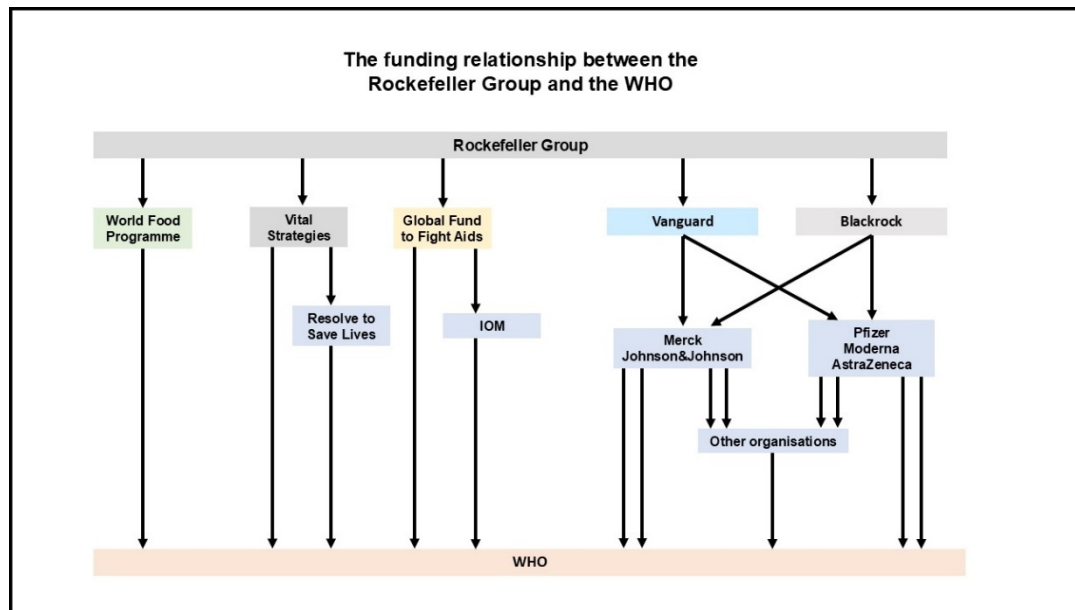


Figure 1: The funding relationship between the Rockefeller Group and the WHO

Figure 2 shows the WHO, as a cofounder of GAVI The Vaccine Alliance, donated funds to GAVI which in turn donated funds to the WHO. GAVI also donated to other organisations that donated to the WHO. Figure 2 also shows the Gates Family, as a cofounder of GAVI The Vaccine Alliance, donated funds to GAVI that donated funds to the WHO and to other organisations that donated to the WHO.

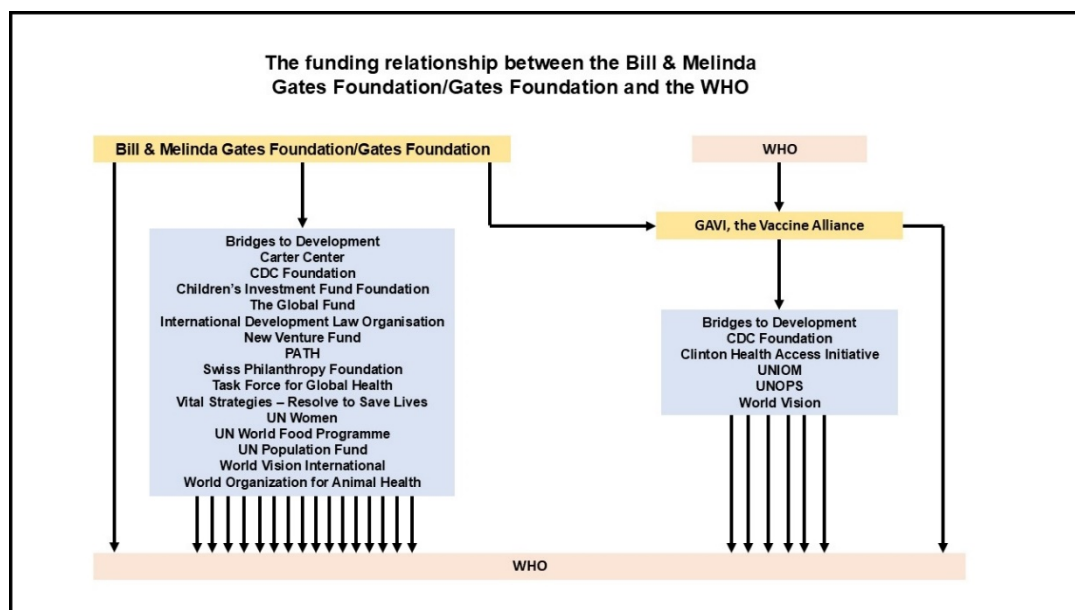


Figure 2: The funding relationship between the Bill & Melinda Gates Foundation/Gates Foundation and the WHO.



# Discussion

## WHO's funding arrangements

The first point of interest is that the WHO has put in place funding arrangements that allows donors to determine how their funds are spent.

There can be no doubt that this is the case, as it was confirmed by Dr Margaret Chan, former Director-General of the WHO.

Chan said, '...I tell you, WHO as an organization, only 30% of my budget is predictable funds; other 70% I have to take a hat and go around the world to beg for money and when they give us the money they are highly linked to their preferences, what they like'<sup>212</sup> and '(m)y budget [is] highly earmarked, so it is driven by what I call donor interests.'<sup>213</sup>

The fact that the WHO is taking money from donors in return for letting them set their own agenda, gives enormous power to these donors, allowing them to buy their way into the activities of the WHO and potentially influence policy.

This is of particular significance when many of these donors are businesses with vested interests.

## Pharmaceutical companies

In 2022-2023, eight pharmaceutical companies donated \$28,722,232 to the WHO for specified purposes. This means that an industry with vested interests purchased over \$28million influence with the WHO. These figures pertain only to the top-100 donor list and would be higher if all pharmaceutical companies who made specified donations to the WHO during that period or in-kind donations were included. However, those are outside the scope of this investigation.

In accepting money directly from pharmaceutical companies, the WHO contravenes its own Guidelines. The Guidelines on working with the private sector to achieve health outcomes<sup>214</sup>. specifically state that the WHO is not to receive funding from commercial organisations that could benefit from its activities. It says:

- 'Funds may be accepted from commercial enterprises whose business is unrelated to that of WHO'. (clause 14)
- 'Funds may not be sought or accepted from enterprises that have a direct commercial interest in the outcome of the project toward which they would be contributing' without specific approval. (clause 15)
- 'Caution should be exercised in accepting financing from commercial enterprises that have even an indirect interest in the outcome of the project.' (clause 16)

Clause 6 of these Guidelines points out that the WHO can potentially affect the fortunes of the commercial organisations via its policies, standards and guidelines. Additionally, the WHO promotes vaccinations for certain diseases and participates with pharmaceutical companies in vaccination programs. All these activities have the potential to be lucrative for the pharmaceutical industry.

Another opportunity for the WHO to benefit the pharmaceutical industry is through the two aforementioned international treaties that it intends to apply to all member states and their populations. These are the 2024 Amendments to the International Health Regulations (2005) and the Pandemic Agreement/Treaty.

Together these treaties allow the WHO to enforce pharmaceutical and genetic treatments – and other measures - on populations if the Director General of the WHO determines there is an emergency – whether or not there is evidence of an emergency.

These treaties have the potential to enormously increase the profits of pharmaceutical companies, as similar measures by the WHO did during the Covid-19 experience.

## Organisational donors

In 2022-2023, 58 organisations donated \$1,741,237,890 to the WHO for specified purposes. Once again, this figure pertains only to the top-100 donor list and would be higher if all donor organisations were included.

This means that the top-100 donor organisations purchased over \$1.7billion of influence with the WHO.

The majority 96.5% of these were pro-pharmaceutical organisations. As we have seen, they were involved in activities such as the promotion and distribution of vaccines, in expanding the vaccine market and facilitating vaccine manufacture and in collaborating with pharmaceutical companies.

Many organisations received funding from pharmaceutical companies. Some Foundations (Novo Nordisk) control pharmaceutical companies and some (eg Bill and Melinda Gates) invested in them.

These relationships necessarily raise questions about the independence of these organisations and their potential to influence the WHO in favour of their pharmaceutical benefactors.

The data further suggests that at least some of these organisations were exerting influence in high places to achieve the pro-pharmaceutical outcomes they wanted. GAVI The Vaccine Alliance says that it works, not to respond to, but to ‘shape the market for vaccines’, suggesting significant levels of influence and/or control. The Program for Appropriate Technology in Health says, ‘PATH works with governments to develop policies and regulations that provide frameworks to expand health product manufacturing and support local manufacturers to meet international quality standards.’<sup>215</sup>

There is evidence that NGOs have been used to funnel money from pharmaceutical companies to the WHO.

A 2006 email from the WHO shows how this can be done. The author, Benedetto Sarceno, Director of the Department of Mental Health and Substance Abuse at the WHO, wrote to Mary Baker of the European Parkinson’s Disease Association (EPDA) about a \$10,000 funding donation he was trying to procure from the pharmaceutical company GlaxoSmithKline (GSK), a willing donor. The money was intended to fund a WHO report on neurological diseases, such as Parkinson’s Disease – for which GSK produced pharmaceutical treatments.

Sarceno's email explained that it was illegal for the WHO to accept money directly from pharmaceutical companies. He continued: 'I suggest that this money should be given to EPDA and eventually EPDA can send the funds to WHO which will give an invoice (and acknowledge contribution) to EPDA, but not to GSK.'<sup>216</sup>

In other words, GSK's donation, funnelled through the Association, would not appear on the record.

Sarenco's email implied that the WHO had been involved in similar arrangements previously. 'This is in line with what we have done so far with other contributions to the report which all are coming from other professional organisations,' it said.

Serenco's comments were not well received. GSK withdrew its offer of funding and the WHO's Christine McNab responded with a firm rebuttal. She said, 'The World Health Organization categorically rejects the allegations ... which imply that WHO solicits money from the pharmaceutical sector through independent organisations by circumventing its own rules.' She admitted that the WHO does accept the pharmaceutical industry's donations or funds, such as vaccines or medications, and said they are all recorded by the WHO.<sup>217</sup>

It could be argued that this arrangement also contravenes the WHO's *Guidelines on Working with the Private Sector to Achieve Health Outcomes*<sup>218</sup>, 2000 which states:

- WHO should avoid indirect collaboration (particularly if arranged by a third party acting as an intermediary between WHO and a commercial enterprise). (clause13)
- 'Funds may not be sought or accepted from enterprises that have a direct commercial interest in the outcome of the project towards which they would be contributing', without specific approval. (clause15)

It can be seen that the current funding arrangements provide a clear opportunity for pro-pharmaceutical organisations to be powerful tools of pharmaceutical companies that can potentially help manoeuvre the WHO in directions that benefit the pharmaceutical industry.

## Other donors

The investigation showed that the majority of the WHO's top-100 donors in other categories were also aligned with pharmaceutical interests. As has been shown:

- 100% of banks (4) profited from lending money to countries to purchase vaccines and invest in pharmaceutical manufacturing.
- 100% regional administrations (8) were sites of significant activity from existing pharmaceutical industries or sites for proposed new pharmaceutical industries.
- 100% of research institutes/hospitals (4) were involved with research into pharmaceuticals.
- 100% of other businesses (2) had links with the pharmaceutical industry.
- 100% of other bodies (2) were connected to the pharmaceutical industry.

Together these donors paid the WHO \$533,688,978 and exerted over \$533million dollars' worth of influence.

It is reasonable to question how this influence may have benefited the pharmaceutical industry.

## Donor networks

The results show that there is a network of relationships between donors, with some donors founding others, some controlling others, many funding others, and many partnering others in various projects.

It has also been shown that there is a hierarchy in these relationships, with a number of family groups at the Centre. For example, the Rockefeller group invests in a number of pharmaceutical companies as well as companies that own pharmaceutical companies as well as funding some top-100 donors. Similarly, the Gates group founded the Bill and Melinda Gates Foundation, which co-founded GAVI The Vaccine Alliance and both funded and/or were involved with other top-100 donors.

Thus, although the specified donations came from multiple sources, there was only a handful of families at the centre of the donation networks.

This raises the question of whether a small number of individuals or families could operate through their foundations and donor networks to influence global policy and WHO activities in particular directions.

## Philanthropic donors

The answer appears to be yes.

Stuckler et al say that ‘Tax-exempt private foundations and for-profit corporations have increasingly engaged in relationships that can influence global health’.<sup>219</sup>

Martens and Seitz<sup>220</sup> consider that the major philanthropic donors have influenced global policy. The Bill and Melinda Gates Foundation, which they describe as ‘the leading actor in global health’ and the Rockefeller Foundation both adopted a technically-based business model to health management – ie applying scientific innovations, such as vaccines. The Rockefeller Foundation spread its approach to health by funding universities, hospitals and churches and by the appointment of Foundation staff in leadership roles at the WHO. The Gates approach has been vaccine-based and called for the ten years following 2010 to be a ‘Decade of Vaccines’.

Martens and Seitz say, ‘Through the sheer size of their grant-making, personal networking and active advocacy, large global foundations, most notably the Rockefeller Foundation and the Bill & Melinda Gates Foundation have played an increasingly active role in shaping the agenda-setting and funding priorities of international organizations and governments.’ As a result, ‘Many states, international organizations, and global health partnerships adopted their approach and adjusted their activities and funding accordingly, focusing on technical interventions.’

This raises a number of concerns.

There is the potential for donors to exert undue influence on an agency’s programs. There are questions about whether a business-approach is the right approach to health or whether a holistic, systems-based approach might be better. Further, the foundations driving the agenda are accountable only to their boards and not to the broader society affected by their decisions. Finally, there are questions about how democratic is a process that puts individuals and the foundations they steer in charge of public health.

## WHO

This investigation reveals some significant and unexpected insights about the WHO. The first is that the WHO's funding arrangements directly contravene its own regulations.

Its Guidelines on working with the private sector to achieve outcomes recommend against accepting funds from 'enterprises that have a direct commercial interest in the outcome of the project toward which they would be contributing' and 'commercial enterprises that have even an indirect interest in the outcome of the project'. These Guidelines do allow the WHO to accept money from commercial enterprises but only if their 'business is unrelated to that of WHO.' The business of both the WHO and its pharmaceutical donors are deeply intertwined as the WHO's aforementioned treaties provide for the mandating of pharmaceutical treatments for member populations.

Despite the provisions of its Guidelines, in 2022-2023, the WHO accepted approximately \$2,798,329,167 directly from pharmaceutical companies and from pro-pharmaceutical organisations, agencies and research institutes.

A second insight is that these funding arrangements allow donors to specify how their funds are to be spent. In other words, to influence the WHO's agenda.

This is enormously important when it comes to the health of the global population that the WHO is attempting to control through its International Health Regulations and Pandemic Agreement/Treaty.

A third insight is that the WHO offers a 3,400% return on financial investments. It is hard to see how investment could return such rewards if the WHO is not putting in place measures that will benefit the industries involved. In the case of the top-100 donors, it must be asked whether the WHO might consider measures that promote the use of pharmaceuticals.

It may be relevant to this discussion that recently the WHO promoted the global use of vaccines for Covid-19, even though these vaccines did not prevent Covid-19, did not stop the spread of Covid-19 and serious side-effects were identified.<sup>221</sup> The Organization also negotiated zero liability for the Covid-19 vaccine manufacturers.<sup>222</sup> Also, the WHO's International Health Regulations and Pandemic Agreement/Treaty further entrench pharmaceutical approaches to address any future pandemics that the WHO's Director General declares on the populations of member states, including Australia.

### **Conflict of interest**

The funding mechanism described in this report shows a clear conflict of interest for the WHO.

The WHO itself defined conflict of interest as follows.

*A conflict of interest can occur when a Partner's ability to exercise judgment in one role is impaired by his or her obligations in another role or by the existence of competing interests. Such situations create a risk of a tendency towards bias in favor of one interest over another or that the individual would not fulfill his or her duties impartially and in the best interest of the RBM Partnership.*

*A conflict of interest may exist even if no unethical or improper act results from it. It can create an appearance of impropriety that can undermine confidence in the individual, his/her*

*constituency or organization. Both actual and perceived conflicts of interest can undermine the reputation and work of the Partnership.*<sup>223</sup>

According to this definition, the WHO's ability to exercise independent judgement is impaired and its reputation undermined.

## Pharmaceutical industry and health

It has been shown that the WHO's funding arrangements allow pro-pharmaceutical donors to influence the WHO's activities, procuring outcomes that will benefit the donors. It is to be expected that many of those outcomes will benefit the pharmaceutical industry itself.

This begs the questions: are the pharmaceutical industries' activities in the best interest of public health?

The evidence suggests that is not always the case.

US investigative journalist Sharyl Attkisson has revealed that:

- between 2003 and 2016, 85% of top the pharmaceutical companies paid penalties for illegal activities and since 2010, pharmaceutical companies have paid more than \$80billion in settlements and fines;
- pharmaceutical companies are known to hide data about the harmful effects of a drug when applying to the FDA (Food and Drug Administration) for approval;
- pharmaceutical companies have written studies supporting their own products and paid scientists to put their name to them;
- pharmaceutical companies have produced drugs that caused symptoms, including death;
- pharmaceutical companies influenced the outcomes of studies on their products, including harassing researchers whose findings weren't agreeable to them;
- taking prescribed pharmaceutical drugs is a major cause of death.<sup>224</sup>

Further, pharmaceutical companies have been involved in pharmaceutical-based projects that proved deleterious to the populations affected. For example,

- the Rockefeller Foundation approach to stopping malaria, adopted by the WHO, was to use the pesticide DDT.<sup>225</sup>
- Germany, Italy, France and Spain suspended the rollout of the AstraZeneca Covid-19 vaccine after evidence linking it with blood clots.<sup>226</sup>
- A two-year investigation by medical journalists revealed that the US FDA authorized hundreds of drugs without evidence of effectiveness and that some are dangerous.<sup>227</sup>

It can be argued that the pharmaceutical industry does not have an obligation to improve public health and that its obligations are firstly to its shareholders. Attkisson says, 'In their defense, pharmaceutical companies are doing exactly what they were built to do: make money. ... There's no law that requires them to put patient health ahead of profits.'<sup>228</sup>

The Constitution of the WHO defines health as 'a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity.'



The WHO's current approach to health in the aforementioned treaties, does not take this definition into account, preferring to equate health with the administration of pharmaceutical drugs.

As medical practitioners, AMPS recognises the value of pharmaceutical drugs to health. However, it understands that there are many ways of supporting public health that do not involve pharmaceuticals, including, but not limited to:

- healthy food
- building immunity
- natural dietary supplements
- exercise
- good sleep
- clean air and water
- healthy homes
- EMF-free environments
- positive social networks
- and a range of non-pharmaceutical treatment options.

This evidence suggests that the WHO's reliance on the pharmaceutical industry and its affiliates to set the agenda for managing global health is not in the best interests of the global population and may, moreover, be detrimental.

## Conclusion

The investigation considered the funding mechanisms of the WHO and the affiliations of the WHO's top-100 donors for specified purposes.

It has been shown that donations are tied to 'donor interests' and that donor interests aligned with pharmaceutical interests for the majority of top-100 donors. This creates an opportunity for the pharmaceutical industry to influence WHO decisions with the potential to affect global health policy.

It has also been shown that the WHO offers a 3,400% return on financial investments. This raises the possibility that the WHO could put in place measures that financially benefit the industries that favour investors. This could presumably include the pharmaceutical industry, favoured by most of the top-100 donors discussed in this report.

The investigation shows that the WHO's current funding arrangements contravene the Organization's own Guidelines and that serious conflicts of interest exist. This situation greatly compromises the WHO, calling into question both its integrity and the trustworthiness of its decisions.

A bias towards the pharmaceutical industry could explain why the WHO's Amended International Health Regulations and Pandemic Agreement/Treaty further entrench pharmaceutical measures as the answer to any and all public health emergencies the WHO chooses to declare. By the power of money, the WHO and the pharmaceutical companies control global health.

# Recommendations

In light of the aforementioned observations and conclusions, AMPS makes the following recommendations.

- that the Australian Government, administrators and medical authorities recognise:
  - that the WHO is a compromised body with conflicted interests that is allowing donors to purchase influence;
  - that the activities of the WHO are being influenced by the pharmaceutical industry, the pro-pharmaceutical family groups behind them and an incestuous network of pro-pharmaceutical organisations linked to them;
  - that the amended International Health Regulations and Pandemic Agreement/Treaty reflect the interests of the pharmaceutical industry rather than the interests of the global population.
- that the Australian Government:
  - immediately withdraws from the International Health Regulations and Pandemic Agreement/Treaty;
  - reinstates Australia's previous pandemic management plan;
  - withdraws from the WHO until such time as that Organization can be demonstrated to be free of conflict of interests and to act in the best interests of global health rather than the interests of the pharmaceutical industry.

## Appendix - Top-100 non-country donors to the WHO's voluntary donations - specified for 2022-23

The following table shows the **top-100 non-country donors to the WHO's voluntary donations - specified for 2022-23**, as per the WHO's webpage: <https://open.who.int/2022-23/contributors/by-fund-types/vcs>.

Entries show donations for categories of donors as shown in this report.

0	Donors	Pharmaceutical companies	Organisations	United Nations	Banks	Research institutions	Regional Administrations	Other businesses	Other bodies
1	Bill & Melinda Gates Foundation		829,502,000						
1	GAVI Alliance		480,872,000						
3	European Commission								366,882,000
4	Rotary International		176,537,000						
5	United Nations Central Emergency Response Fund (CERF)			139,871,000					
6	World Bank				117,758,000				
7	United Nations Children's Fund (UNICEF)			111,011,000					
8	United Nations Development Programme (UNDP)			105,189,000					
9	Global Fund to Fight AIDS, Tuberculosis and Malaria (GFATM)		40,862,000						
10	UNITAID			39,675,000					
11	United Nations Office for the Coordination of Humanitarian Affairs (UNOCHA)			39,136,000					
12	Pre-Qualification Fees (PQF)								
13	Bloomberg Family Foundation		29,270,000						
14	United Nations Office for Project Services (UNOPS)			24,670,000					
15	National Philanthropic Trust (NPT)		20,992,000						
16	Asia-Europe Foundation (ASEF)		18,689,000						
17	Wellcome Trust		17,752,000						
18	WHO Foundation		17,322,000						
19	Joint United Nations Programme on HIV/AIDS (UNAIDS)			12,287,000					

0	Donors	Pharmaceutical companies	Organisations	United Nations	Banks	Research institutions	Regional Administrations	Other businesses	Other bodies
20	Sanofi-Aventis	12,099,000							
21	Miscellaneous Fees for International Nonproprietary Names (INN)								NA
22	United Nations Population Fund (UNFPA)			10,078,000					
23	L'institut de France		9,616,000						
24	African Development Bank Group				8,342,000				
25	Vital Strategies		8,034,000						
26	Others								
27	Resolve To Save Lives		7,299,000						
28	St. Jude Children's Research Hospital					6,296,000			
29	Children's Investment Fund Foundation (UK)		6,259,000						
30	Rockefeller Foundation		6,166,000						
31	Kobe Group (Hyogo Prefecture, Kobe Chamber of Commerce and Industry, Kobe Steel, Ltd.)							5,968,000	
32	Novo Nordisk Foundation		5,541,000						
33	Carter Center		5,294,000						
34	Generalitat de Catalunya, Spain						4,962,000		
35	Bayer AG	4,864,000							
36	Sasakawa Health Foundation		4,835,000						
37	United Nations Foundation		4,490,000						
38	CDC Foundation		4,182,000						
39	Merck Sharp and Dohme-Chibret	4,154,000							
40	United Nations Environment Programme (UNEP)			4,102,000					
41	Fondation Botnar (FB)		3,811,000						
42	Palestine Telecommunications Company (Paltel Group)							3,450,000	
43	Asian Development Bank				3,314,000				
44	Government of Flanders, Belgium						3,174,000		
45	King Baudouin Foundation United States (KBFUS)		3,003,000						
46	Ikea Foundation		2,990,000						
47	GlaxoSmithKline (GSK)	2,805,000							

0	Donors	Pharmaceutical companies	Organisations	United Nations	Banks	Research institutions	Regional Administrations	Other businesses	Other bodies
48	International Organization for Migration (IOM)			2,624,000					
49	Uppsala Monitoring Centre								2,545,000
50	Global Disability Innovation Hub		2,421,000						
51	European Investment Bank				2,406,000				
52	AO Foundation, Switzerland		2,363,000						
53	Helmsley Charitable Trust		2,274,000						
54	Richter Gedeon Vegyeszeti Gyar	1,988,000							
55	Bridges to Development		1,934,000						
56	Fondazione Telecom Italia		1,750,000						
57	Foundation for Innovative New Diagnostics (FIND)		1,676,000						
58	Macao, SAR, People's Republic of China						1,585,000		
59	World Food Programme (WFP)			1,513,000					
60	LEGO Foundation		1,476,000						
61	Southern African Development Community Secretariat (SADC)						1,403,000		
62	United Nations Entity for Gender Equality and the Empowerment of Women (UN Women)			1,394,000					
63	Pan American Health Organization (PAHO)		1,391,000						
64	Lions Clubs International Foundation		1,386,000						
65	Clinton Health Access Initiative		1,364,000						
66	United Nations Peace and Development Trust Fund (UNPDF)			1,349,000					
67	Novartis	1,341,000							
68	Sightsavers		1,327,000						
69	Task Force for Global Health (TFGH)		1,215,000						
70	Robert Koch Institute (RKI)					1,179,000			
71	International Development Law Organization		1,175,000						
72	New Venture Fund (NVF)		1,077,000						
73	Zhongshan Ophthalmic Center, China					1,092,000			

0	Donors	Pharmaceutical companies	Organisations	United Nations	Banks	Research institutions	Regional Administrations	Other businesses	Other bodies
74	Korean Foundation for International Healthcare - Dr Lee Jong-Wook Memorial Fund (KOFIH)		1,077,000						
75	International Development Research Centre (IDRC)					1,073,000			
76	International Telecommunication Union (ITU)			1,069,000					
77	World Vision International		1,055,000						
78	Fundación Anesvad		1,004,000						
79	Hilfsaktion Noma e.V.		983,204						
80	David and Lucile Packard Foundation		976,729						
81	Miscellaneous Healthy Cities								NA
82	Elrha		959,045						
83	Program for Appropriate Technology In Health (PATH)		934,458						
84	Christoffel-Blindenmission		826,279						
85	World Diabetes Foundation		795,631						
86	Swiss Philanthropy Foundation		745,348						
87	Eisai Co., Ltd.	740,760							
88	Merck	730,472							
89	Food and Agriculture Organization (FAO)			715,067					
90	Fondation d'Harcourt		707,107						
91	Fred Hollows Foundation (FHF)		642,573						
92	Seoul Metropolitan Government of the Republic of Korea						595,845		
93	World Organization for Animal Health (OIE)		593,828						
94	Economic Research Institute for ASEAN & East Asia (ERIA)						584,360		
95	Economic Community of Central African States (ECCAS)						579,525		
96	Autism Speaks		552,497						
97	Guttmacher Institute		515,000						
98	Pilipinas Shell Foundation, Inc.		508,409						
99	La Métropole Grand Lyon, France						497,248		
100	Big Heart Foundation (TBHF)		467,290						
101	Bernard van Leer Foundation (BvLF)		465,751						



0	Donors	Pharmaceutical companies	Organisations	United Nations	Banks	Research institutions	Regional Administrations	Other businesses	Other bodies
102	Crown Agents Services Limited								
103	Alliance for Public Health, Ukraine		450,528						
104	World Psychiatric Association (WPA)		416,213						
105	Edmond J. Safra Foundation		415,000						
		\$28,722,232	\$1,741,237,890	\$494,683,067	\$131,820,000	\$9,640,000	\$13,380,978	\$9,418,000	\$369,427,000

Note: the entries shaded in grey were not considered in this report.

**TOTAL** **\$2,798,329,167**

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