**Position of Medicines for Poland for public consultation on the *New European Innovation Agenda initiative* by the European Commission**

As representatives of domestic pharmaceutical manufacturers associated in the Medicines for Poland organisation, we are very pleased with the New European Innovation Agenda initiative. Being members of one of the most innovative industries in Poland, we believe that innovation is the key to development and to building modern solutions that will have a positive impact on the functioning of societies, both regionally and centrally across the European Union.

We fully agree that action must be taken to recover from the COVID-19 pandemic, to support the ecological and digital transformation of the EU society and ensure open strategic autonomy of the EU and that this can be achieved by bringing together policies, investments and instruments in a common approach to drive systemic change and have an EU-wide impact.

However, we are convinced that innovation should be perceived in accordance with the Oslo Manual's definition, which will allow us to implement actions that will bring us closer to achieving the objectives set out in the initiative's description. This approach to innovation will bring the greatest benefits to societies. In the context of the current geopolitical situation, as well as possible global threats, we would like to emphasize the need to strengthen the local pharmaceutical sector and thus ensure society's access to effective and modern therapies.

For this to happen, it is crucial to properly assess what innovation is and what characteristics it should have. The criterion for innovation, as defined by the OECD, is not only the technological dimension, but above all the benefits that are obtained by its recipients (patients, health care system) in terms of health, social and economic dimensions.

It is also the access of patients to the implemented solutions, the impact on the national market and economy and the improvement of the competitiveness of enterprises. In view of the above, we would like to share with you our position and comments on the proposed initiative.

Re. 1. *”In the past decade, there has been some progress in bridging the innovation divide, notably through some Member States catching up and improving their performance on a number of R&I performance measures, such as patents.”*

We believe that patents should not be the primary measure of innovation, but a measure of inventiveness. Innovation should be measured by products/services that have been launched, which meet customer needs and have an impact on Member State markets (changes in existing markets, competitiveness). Innovation should be measured in terms of the benefits arising from the implementation of ideas.

Re. 2 *”The proposed agenda will help better integrate initiatives and investment at EU and national levels with strengthened innovation policy making. It will support the twin transition by better taking into account the new wave of deep-tech innovation.”*

The wave of innovation, in our opinion, should not be limited to technology but should take into account all functionalities that define innovation (according to the Oslo Manual): accessibility of societies to improved products/services that are characterized by affordability, better comfort of use, usability and user-friendliness in relation to what the market currently offers.

Re. 3. *”The new European Innovation Agenda aims to reinforce European capacity to accelerate and master innovative solutions (including deep-tech development and applications). These are needed for the post-COVID recovery, to aid the green and digital transitions in EU society and to secure the EU’s open strategic autonomy."*

Viewing innovation exclusively in the technological context will allow the EU to be strengthened only in the dimension related to ecological and digital transformation. Strengthening after the pandemic crisis, on the other hand, will be possible through a policy of supporting innovation defined by its benefits for EU societies and economy. It is therefore necessary to promote and support innovation focused on widening the access of the EU society to improved products/services, which are characterised by affordability, better convenience of use, usability and user-friendliness in relation to what the market currently offers. Furthermore, we believe that priority should be given to innovations arising from the use of available knowledge or technology, as this guarantees a greater chance of implementation and thus of achieving competitive advantages for operators in EU markets.

*Re. 4. ”* *An initiative on innovation ecosystems to strengthen and interconnect local R&I ecosystems, especially those that currently perform less well on innovation. This initiative could mobilise relevant policies, funding instruments and stakeholder efforts for the green and digital transitions under comprehensive regional innovation partnerships, thereby contributing to bridging the innovation divide and helping connect local R&I ecosystems to EU-level initiatives, as well as to horizontal and vertical European value chains. It also facilitates access to state-of-the art technology infrastructures for deep-tech companies across Europe.”*

According to our best knowledge and the opinion of domestic pharmaceutical manufacturers, the Polish economic environment needs better conditions for public-private partnerships and mechanisms to support science-business cooperation and bridging grants.

Re. 5. *”* *An initiative for better innovation policy making, strengthening the existing information base underpinning innovation (definitions, data and methodology), including by updating the innovation scoreboard, providing targeted policy support to Member States”*

Yes, but with reference to measurable benefits resulting from the implementation of the innovation.

Re. 6. *”* *It will also seek to reduce the existing gap between research & innovation and deployment of solutions needed to tackle challenges for European society (e.g. the Horizon Europe Missions).”*

The existing gap between research and implementation is the result of viewing innovation only in terms of technology and patents. Technologies and patents are tools that may or may not lead to innovation. Proper understanding and measurement of innovation according to the Oslo Manual 2018 i.e. as new/improved products offered to the market, which **respond to customer needs by offering advantages** (affordability, improved user-friendliness, usability and user-friendliness) over what the market has so far offered, would significantly increase deployment. Supporting with EU funding solutions that bring benefits not only in the technological dimension, but most of all in the socio-economic one, would significantly increase the involvement of enterprises in R&D, and scientific entities in conducting research of an application character that has a market justification..

We hope that you will consider taking our comments to this document into account, thus allowing for a more complete and better implementation of the planned solutions, achieving the intended objectives, and above all, generating tangible benefits for the entire community of the European Union.