



April 2, 2026

Mr. John A. Squires  
Under Secretary of Commerce for Intellectual Property  
Director of U.S. Patent and Trademark Office  
600 Dulany Street  
Alexandria, VA 22314

Dear Director Squires,

Thank you for joining the U.S.-UK IP Working Group meeting, co-hosted by the U.S. Chamber of Commerce (“the Chamber”) and BritishAmerican Business (“BAB”), in Washington, DC on February 24, 2026. Your presence and insights were invaluable to the success of the discussion.

The Chamber and BAB appreciate USPTO’s efforts to work with trading partners to advance more effective IP protection and enforcement worldwide. The meeting reaffirmed the strength of the bilateral partnership and underscored the importance of close coordination between the UK Intellectual Property Office (“UK IPO”) and the U.S. Patent and Trademark Office (“USPTO”). Following our conversation, we present the following priorities for consideration by both governments:

**UK & EU Developments**

**First:** Some industry stakeholders have raised questions regarding the inclusion of a safe harbor for licensing negotiation groups (LNGs) in the draft Technology Transfer Guidelines (TTG) associated with the proposed Technology Transfer Block Exemption Order under consideration by the UK’s Competition and Markets Authority. The Chamber generally appreciates when competition guidelines include safe harbors; however, safe harbors should only be granted to forms of conduct that do not present risk of antitrust harm. LNGs can operate as a collective negotiation mechanism that could inappropriately undermine patent holders’ ability to negotiate a fair royalty rate. Buyer cartel type behavior is an antitrust concern. As the UK finalizes its TTG, we encourage USPTO to engage with the UK IPO to ensure such adverse conduct is not recognized within the scope of any safe harbor. Further, together USPTO and the UK IPO should advocate the European Union similarly aligns its approach to any safe harbor. We appreciate USPTO’s support for continued dialogue toward a balanced technology licensing frameworks and maintain an environment conducive to innovation and investment.

**Second:** The EU's General Pharmaceutical Legislation undermines the ecosystem for life sciences investment by weakening IP rights and related incentives. The recently finalized legislation reduces regulatory data protection (RDP) and conditions the restoration of lost RDP terms on criteria such as conducting clinical trials in multiple EU Member States or seeking marketing authorization in the EU within 90 days of first global submission. The legislation also expands the Bolar exemption in a manner that is inconsistent with international best practice and the EU's commitments under the WTO TRIPS Agreement. Industry encourages the U.S. and the UK governments to work with their EU counterparts to rescind any changes that go beyond international law and practice and to create a pharmaceutical landscape that prioritizes groundbreaking innovation. Likewise, we suggest that U.S. encourage the UK to refrain from adopting proposals that may inadvertently weaken IP incentives that underpin investment in life sciences innovation.

**Third:** Industry has serious concerns about the UK's application of the doctrine of plausibility in patent cases and recommends that the UK examine the implications carefully. This is a particular concern for life sciences companies, as it has led to revocation of patents and related Supplementary Protection Certificates (SPCs) for several medicines in the UK. This doctrine deviates from the European Patent Office's and other jurisdictions' standards, which has resulted in similar patents and SPCs being upheld, making the UK's application a global outlier. The application of this doctrine marks a divergence from other countries that are part of the European Patent Convention, which may lessen the UK's attractiveness for launching innovative medicines and investment.

### **Collaboration in Multilateral Organizations**

**First:** The Chamber and BAB are deeply grateful for the USPTO's leadership in advancing effective IP standards through the multilateral rules-based system. Industry encourages the U.S. and UK to coordinate on advancing an affirmative IP agenda at WIPO and WTO, including UK consideration of support for proposals on copyright for growth and technological protection measures in the WIPO Standing Committee on Copyright and Related Rights.

**Second:** Enhanced coordination between our two governments will be essential following the WTO's 14<sup>th</sup> Ministerial Conference (MC-14) as discussions continue on a number of proposals. We urge the U.S. and UK to oppose a draft Ministerial Declaration introduced by India, titled "Enabling the Transfer of Relevant and Advanced Technology for Trade," that risks weakening IP protections by potentially forcing technology transfer. More broadly, industry encourages the U.S. and the UK to work together to advance data-driven narratives on the importance of IP protection to innovators and creators worldwide.

**Third:** Ahead of WIPO Director General Daren Tang's second term, we encourage U.S.-UK collaboration with the WIPO Secretariat on the appointment of strong candidates for the Deputy

Director General and Assistant Director General positions. Industry encourages the U.S. and UK to ensure that all senior WIPO Leadership positions are held by personnel with established track records of supporting strong IP protection globally, deep expertise working in international organizations, and a demonstrated ability to work constructively with leadership to advance WIPO's core mission.

### **Third Country Collaboration**

**First:** Continued U.S.-UK partnership will be critical to raising the bar for IP protection and enforcement with our trading partners. We suggest the U.S. and UK consider joint diplomatic interventions, such as demarches, to weigh in on key policy discussions in India, Peru, and South Africa. This includes to efforts oppose India's proposed statutory licensing requirement for AI training.

**Second:** The Chamber and BAB strongly support the USPTO and UK IPO IP attaché programs which play a vital role in promoting stronger IP standards worldwide. Industry is grateful for the existing collaboration between the U.S. and UK IP attachés in their in-country engagement on timely policy issues. We would welcome the opportunity to work with both USPTO and UK IPO and their respective IP attachés to identify priority countries for coordinated engagement.

The Chamber and BAB support the USPTO's efforts to advance collaboration with UK IPO on IP protection and enforcement, a vital element of the enduring partnership between the U.S. and the UK. We stand ready to support continued dialogue between UK IPO and USPTO, facilitate stakeholder input, and advance IP protection globally. We appreciate your consideration of our views and look forward to continued engagement with you.

Sincerely,



Bradley J. Watts  
SVP  
Global Innovation Policy Center  
U.S. Chamber of Commerce



Duncan Edwards  
CEO  
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