February 10, 2021

Via email: PMPRB.Consultations.CEPMB@pmprb-cepmb.gc.ca

To whom it may concern:

Response to: Notice and Comment – On the change to the definition of Gap medicines and the timeline for compliance (January 15, 2021)

The City of Mississauga's Economic Development Office is making this submission expressing concern over the proposed changes to the Guidelines transition period timeline.

Mississauga is home to a thriving life sciences sector, the second-largest in Canada, featuring over 470 companies – many are global leaders in innovative medicines – employing over 25,000 people. Within this sector, over 40 pharmaceutical companies in Mississauga contribute significantly to our local economy, creating jobs, paying taxes, and helping us grow the life sciences sector within our City.

In addition to concerns previously raised by our Mayor regarding the PMPRB's impact on the availability of new medicines, employment, and research investments, Mississauga's pharmaceutical companies have expressed concern over the proposed shortened transition time outlined in the Notice and Comment. After speaking with several of our local life science companies, we understand that a six month transition period may be insufficient. It places an undue burden on companies, during the pandemic when their focus should be on ensuring Canadian patients' access to medicines.

We understand that a great deal of work is required to achieve compliance with the new Regulations, including securing global approvals, communicating with customers and formularies, and amending product listing agreements and commercial contracts. A minimum twelve-month transition period from the date that the Regulations come into force seems more reasonable to allow all parties to continue focusing on addressing the COVID-19 pandemic.

Thank you for providing the opportunity to comment on the proposals.

Sincerely,

Harold Dremin

Acting Director, Economic Development

City of Mississauga