



HEALTH COALITION OF ALBERTA

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Patented Medicine Prices Review Board
333 Laurier Ave. West, Suite 1400
Ottawa, Ont. K1P 1C1
Email: PMPRB.Consultations.CEPMB@pmprb-cepmb.gc.ca

To Whom it May Concern:

Thank you for providing Canadians the opportunity to submit feedback on two additional changes to the PMPRB Guidelines. Although neither change (definition of gap Medicines and compliance timelines for grandfathered and gap medicines) impact key concerns expressed by the Health Coalition of Alberta's members, we are taking the time to write, once again, in the hopes we can get some answers to our outstanding questions.

The Health Coalition of Alberta is a group of 100 voluntary health sector organizations, consumer groups and individuals committed to working together and advocating with a united voice for better access to optimal healthcare for all Albertans. Primary initiatives of the Health Coalition include advocacy on key healthcare access issues, education of members and the public, and awareness regarding healthcare reform decisions and service changes which could impact Albertans, and particularly patients in their care pathways and health outcomes.

Our members are supportive of securing lower medication prices in Canada, however not to the extent that it jeopardizes Canadians' ability to access new treatments in the coming years. We have expressed the many concerns our members have about the long-term ramifications of the PMPRB Guidelines in our previous submissions. Unfortunately, we have not received any response from the PMPRB that assuage our fears let alone provides evidence to disprove the negative impacts we can see in patients' futures.

Items of particular concern that remain unanswered include:

1. Will such sweeping reforms result in fewer or delayed launches of new medications in Canada?
2. Will expanded medication criteria launches simply not occur in Canada?
3. Will hospitalization rates increase with the potential reduced access to medications?
4. Will Canada's record high number of medication shortages increase due to dramatic price reform?
5. Will we see reduced industry investment in patient support programs, the loss of which could trigger increased burden on our healthcare system by creating gaps in patient education and assistance?

6. Will industry funded companion diagnostics and treatment clinics be eliminated, impacting access to established healthcare teams and drive up wait times and public system costs?
7. Will this across-the-board restructuring create gaps in access for Canada's vulnerable populations and reduce health outcomes for patients?

It is our hope that the current delay in implementing the PMPRB Guidelines provides time required to develop revisions and create a simple, staged and flexible model that is an appropriate, consistent tool to regulate prices of medications in Canada. In the future, it is essential that PMPRB reflects the importance of patient involvement in healthcare decisions by following the engagement model established by CADTH. Patient perspectives must be entrenched at all levels within PMPRB to ensure Canadian values are reflected in PMPRB's goals. This can be achieved by the appointment of public members to the Board and Human Drug Advisory Panel as well as the creation of an Expert Patient Advisory Panel to assess all projects through a societal lens.

If the Health Coalition of Alberta receives a response to our member questions from PMPRB, we commit to sharing it with our 100 members. We hope that the recommendations we have submitted over many years are given valued consideration before any change is implemented to reduce medication prices while guaranteeing patient access to optimal treatments. If you have any questions about this submission, please contact the Health Coalition at director@healthcoalitionab.ca

Sincerely,



Beth Kidd
Executive Director