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February 12, 2021

Patented Medicine Prices Review Board 333 Laurier Avenue West, Suite 1400 Ottawa, Ontario K1P 1C1

Regarding: Consultations on the PMPRB's proposed changes to the definition of Gap medicines and the timeline for compliance

Dear PMPRB Board Members,

Life Sciences BC would like to take this opportunity to provide feedback on the recent PMPRB's proposed Guidelines' changes to the definition of Gap medicines and the timeline for compliance.

Recently, since the outbreak of COVID -19, the life sciences sector has been at the forefront of Canada's response to the COVID-19 pandemic. In British Columbia, we are proud of the leading science that has been generated in this Province and its contribution to the global effort to develop effective vaccines and therapeutics to treat this world-wide pandemic. The investment made in this sector has resulted in definable scientific victories, that will halt the spread of this deadly virus, while putting Canada on the path to economic recovery.

As we have responded over the course of the last several months regarding the unintended consequences, we believe these new regulations will impact patient care outcomes, deter much needed R & D investment and potentially stifle, an investment sensitive SME economy and sector growth including the country's economic recovery.

For these reasons we feel it is critically important for the PMPRB especially in light of COVID-19's immeasurable impact to:

 Reconsider the proposed 6-month transition period and revert to the 12-month period as originally proposed in the 2020 Guidelines.



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Facilitate and support alternative solutions to meet the government's objectives of patient care
outcomes, affordability and access to medicines.

LifeSciences BC endeavours to find workable solutions to mitigate healthcare spending while ensuring patient care outcomes for all Canadians, meets a standard of excellence they are deserving of.

Sincerely

Wendy Hurlburt,

President and CEO,

LifeSciences BC

LifeSciences