



February 9, 2021

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

SUBJECT: NBHRF Concerns on PMPRB Guideline Implementation

To whom it may concern:

I am writing to express our support for Innovative Medicines Canada's position related to the amendments to the new Patented Medicine Prices Review Board (PMPRB) Guidelines ("Guidelines") resulting from the delay of the coming-into-force date of the *Regulations Amending the Patented Medicines Regulations*.

The New Brunswick Health Research Foundation (NBHRF) is an independent, not-for profit organization governed by a board of directors comprised of key stakeholders from the health research community in New Brunswick and funded by the provincial government. NBHRF's mission is to provide leadership and support to build health research capacity and improve the health of New Brunswickers (www.nbhrf.com).

Industry investments and partnerships are critical to our research capacity in New Brunswick. Moreover, the study and timely introduction of new treatment advancements are foundational to health care in the province. We are concerned that the Guidelines and the timing of their implementation will have a significant long-term adverse impact on the research enterprise in this province.

NBHRF has already experienced the adverse effect created by uncertain environment from the new regulations and Guidelines. Over the past year, industry investments in New Brunswick have been put on hold and reduced compared to previous years. These reductions to support clinical research and to conduct clinical trials challenge our ability to attract and retain highly educated and highly paid research professionals. These investments are a major importance to the New Brunswick economy.

The COVID-19 pandemic has shown us the critical importance of industry partnerships and investments in life sciences. We are gravely concerned with the approach employed by the PMPRB with respect to industry consultation and the new truncated transition period. We are asking the Federal governmental agency to re-evaluate its approach and create a more welcoming environment for new pharmaceutical and vaccine research and innovations. In particular, we like to see the Federal government further defer the new regulations pending an open dialogue between the industry and the PMPRB to find a mutually agreeable path forward that will be in the interest of all Canadians.

Best regards,

Peter Brenders
CEO