February 12, 2021

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

Patented Medicine Prices Review Board (PMPRB)
Box L40 Standard Life Centre
333 Laurier Avenue West, Suite 1400
Ottawa, Ontario, K1P 1C1

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)

Takeda Canada Inc. (Takeda) would like to thank the Patented Medicine Prices Review Board (PMPRB) for the opportunity to provide our feedback to the proposed change to the definition of Gap medicines and the timeline for compliance in the new PMPRB Guidelines.

Takeda has significant concerns with PMPRB's January 15, 2021 proposal. In particular, we are opposed to the proposed reduction of the transition period in the new Guidelines from two reporting periods (12 months) to one reporting period (6 months). We remain discouraged that the PMPRB has not addressed our concerns regarding the disproportionate negative overall impact that these price reforms will have on all patented medicines, especially those drugs for rare disease (DRD).

As a member company of both Innovative Medicines Canada (IMC) and BIOTECanada. Takeda supports the positions, recommendations, and concerns raised in both industry associations' respective submissions.

Takeda Canada Inc.

Legal Disclaimer:

This submission and any other engagement in consultations with the PMPRB regarding the Patented Medicines Regulations, as amended, and related Guidelines are without prejudice and are not intended and should not be interpreted as supporting the amendments to the PMPRB Regulations or the Guidelines. Takeda continues to have concerns about the legality of the Patented Medicines Regulations, as amended, and the Guidelines which are the subject of ongoing legal challenges. Takeda reserves its full legal rights to oppose any aspect of the Patented Medicines Regulations and related Guidelines.

Takeda Canada Inc.
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