

December 5, 2022

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

Subject: 2022 Patented Medicine Prices Review Guidelines

Dear PMPRB Board Members,

Life Sciences British Columbia ("LSBC") would like to take this opportunity to provide feedback on the proposed Patented Medicine Prices Review Board ("PMPRB")'s regulatory guidelines.

LSBC is a non-profit member-based society, whose members consist of academic and research institutions, life sciences innovative companies, health organizations, life science service providers and funders. On behalf of our members, LSBC has made multiple submissions expressing concerns with the potential negative consequences and indirect downstream impacts on the life sciences sector because of the regulatory guidelines proposed for the PMPRB.

In Canada, we are fortunate to have world-leading research institutes, universities, small, medium, and large life science companies working together, with global partners, to advance science and medical discoveries. As a result of world class research and science, life sciences sector innovation 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 corresponding contribution to the global effort in the development of critical and effective vaccines and therapeutics to address the challenges of the pandemic. The investment made in this sector by government, global pharmaceutical and local life sciences companies has resulted in definable scientific victories that have stalled the spread of COVID-19, while enabling Canada to emerge through the pandemic.

As we have raised in previous submissions, we believe the new proposed PMPRB regulations will adversely impact scientific discovery and patient care outcomes through delayed or limited access to innovative medicines, deter and/or reduce investment critical research and potentially stifle investment in life sciences companies at a time where the sector is so critical to developing innovative solutions to address the complex issues and gaps in our health system. Now is not the time to bring in further uncertainty.

The life sciences sector has been identified by both Federal and Provincial governments as a priority sector. For many of the provinces, the life sciences sector is one of their fastest growing sectors significantly outpacing other sectors in investment attraction and job creation. In addition, it is widely recognized that the innovative products, solutions, and services developed by the life sciences sector are critical to the long-term sovereignty and sustainability of our much-valued health system. LSBC was pleased to see this recognized through the collaboration between the Minister of



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Innovation, Science and Industry and the Minister of Health in the announcement of the Federal Biomanufacturing and Life Sciences Strategy.

Canadian federal and provincial innovation strategies have all identified life sciences/health as a priority sector. All stakeholders, from across academia/research, local and global industry and government have a key role to play in the development a thriving life sciences ecosystem. To the extent possible, we need to have that we have a predictable industry environment for stakeholders to invest in science and company growth and creation. We are extremely concerned that the proposed PPRB guidelines will create significant uncertainty which will inherently negatively impact the flow of investments in both research, company creation and growth and ultimately the launches of innovative medicines. As a result, we recommend that the proposed guidelines NOT be implemented.

It goes without saying that the COVID-19 pandemic has had extraordinary implications on the health system. Through the pandemic we experienced unprecedented collaboration between government, industry, and the health system. There is an opportunity to build on that collaboration. Collectively, let's seize the opportunity to come together as stakeholders to develop alternative solutions to the PMPRB proposed guidelines and ensure that, as the Federal Biomanufacturing and Life Sciences strategy details that Canada is best positioned to enable "innovation by ensuring world class regulation for the benefit of all Canadians".

Sincerely

A handwritten signature in blue ink, appearing to read "Wendy Hurlburt", written over a light blue stylized graphic element that resembles a pen nib or a stylized letter 'H'.

LifeSciences

Wendy Hurlburt,
President and CEO,
Life Sciences BC