

December 5, 2022



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

Subject: 2022 Proposed Updates to the PMPRB Guidelines

As leaders of organizations in the field of cancer research, we are reiterating our concerns of the lack of certainty in Canadian drug pricing regulations. The proposed 2022 update to the guidelines, does not resolve our major concern over private sector R&D investment into publicly supported cancer research. The health and quality of Canada's biomedical research ecosystem continues to be at risk and without assessment of their impact on the co-funding of cancer research in Canada (i.e., matching funds to federally funded biomedical research).

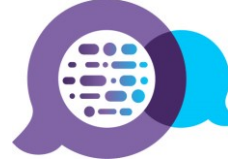
We stress that we are not taking a position on medicine pricing and support the government's efforts to improve medicine affordability and access for Canadians. However, we believe that the proposed PMPRB Guideline Update could also result in inadvertent but harmful impacts on the health research ecosystem and it is critical that these impacts be seriously considered and evaluated.

In March, 2022 we wrote to the PMPRB in support of the proposed PMPRB's Guideline Monitoring & Evaluation Plan (GMEP). It was our view that the monitoring of changes in research investments, clinical trials, and medicine access be conducted in a transparent and open manner by an independent review panel subject to peer review. In terms of monitoring the impacts of the reforms on research investments, we also recommend providing a role (e.g., observer status) to organizations such as Research Canada or the Canadian Health Research Forum, who understand the health research ecosystem and can provide perspectives about the situation "on the ground."

We would also like to stress that these critical impact assessments need to be conducted prior to the adoption of the updated guidelines (in addition to after) to avoid a potential harm to Canada's biomedical research system and that a contingency plan is developed and made public on how such risks will be mitigated.

Thank you for the opportunity to provide our input.

On behalf of The Canadian Health Research Forum,



Handwritten signature of Richard Fajzel in black ink.

Richard Fajzel, MBA
Chairman, CQDM
Past-president and CEO, [Exactis Innovation](#)

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Dr. Gerald Batist MDCM, CM, CQ, FRCP(C), FACP, FAHC
Director, Segal Cancer Centre, Jewish General Hospital, and
McGill Centre for Translational Research in Cancer

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Handwritten signature of Rafi Hofstein in black ink.
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Rafi Hofstein PhD
Past President and CEO MARs Innovation/TiAP (2009-2019)
Member of the Board of Directors, Exactis Innovation

Handwritten signature of Stephanie Michaud in blue ink.

Stephanie Michaud PhD
President and Chief Executive Officer BioCanRx

Handwritten signature of Aaron Schimmer in black ink.

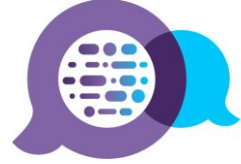
Aaron Schimmer MD, PhD, FRCPC
Staff Physician and Senior Scientist at the Princess Margaret Cancer Centre, University Health Network
Director of Research, Princess Margaret Cancer Centre
Professor, Department of Medical Biophysics, University of Toronto
Co-leader of OICR's Acute Leukemia Translational Research Initiative

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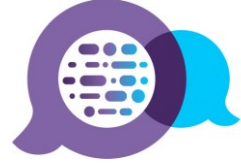
Mr. Barry Stein B.Comm, B.C.L., LL.B
President, Colorectal Cancer Canada
President, Coalition Priorité Cancer au Québec
Founding member, CPAC National Colorectal
Cancer Screening Network

Handwritten signature of Rodney Ouellette in black ink.

Rodney Ouellette MD, PhD
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