

December 1, 2022

The Honourable Jean-Yves Duclos  
Minister of Health  
Brooke Claxton Building, Tunney's Pasture  
Ottawa, Ontario K1A 0K9

Dear Minister Duclos:

I am writing regarding the proposed updates to the Patented Medicine Prices Review Board (PMPRB) Guidelines. We are recommending that the federal government consider further consultation with all stakeholders that will be affected. We suggest that any final decisions be delayed until a more comprehensive approach is taken to better understand the impact that could be felt by the healthcare system.

The Lung Association of Nova Scotia and Prince Edward Island is a health charity dedicated to improving the lung health of Nova Scotians and Islanders with a particular focus on patient advocacy. In many cases, those that we serve are unable to voice their concerns or unaware of the long-term impacts of major government decisions. We want to ensure that their best interests are considered and we believe an inclusive approach with government and stakeholders will ultimately result in better outcomes for all on issues that are in the best interests of healthcare.

We are very cognizant of the complexities that are within the healthcare system in Canada, and must be considered to ensure that affordability and accessibility to healthcare is paramount. We also recognize and support the objective of the government to make prescription medicines and therapies more affordable. Our concern remains that the draft guidelines may have unintended negative consequences with pharmaceutical innovations coming to Canada in a timely fashion. We are apprehensive that Canadians will be unable to access new medicines or therapies that will improve and extend the patient's journey.

Increased affordability to medications and therapies for Canadians is something that we will always advocate for. We will also work to ensure accessibility to the most effective innovative medicines for all Canadians. In the case of the draft PMPRB guidelines, we believe that the federal government should pause and reflect on all potential negative consequences and include an impact assessment before any final guidelines are implemented.

Thank you for your consideration on this matter.

Sincerely,

Robert MacDonald  
President & CEO

