

Sun Life Submission

Patented Medicine Prices Review Board
December 5, 2022



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To: PATENTED MEDICINE PRICES REVIEW BOARD

Submitted via online portal.

Re: Sun Life's comments on Patented Medicine Prices Review Board (PMPRB) Draft Guidelines consultation

Thank you for the opportunity to provide feedback on the PMPRB consultation. We are pleased to provide our response to the PMPRB draft Guidelines which define the processes for review of pricing for patented medicines sold in Canada.

We are writing to express our support for the views shared by our industry association, the Canadian Life and Health Insurance Association (CLHIA), in their submission to this consultation. We support the work of PMPRB to ensure that prescription drug prices are not excessive and are pleased to see that the change in process to require submission of annual ex-factory list prices will have effect of reducing prices over time. We are also pleased to see that there will be relief on prices for drugs prior to July 1, 2022.

At Sun Life, our Purpose is clear: to help our Clients achieve lifetime financial security and live healthier lives. Our roots run deep in Canada, where our company began more than 150 years ago. Our business started with the sale of insurance and has expanded to offer wealth and asset management solutions and customized health programs to our Clients. We are a market leader and the largest provider of group benefits in Canada with more than 11,500 employees and 3,600 advisors across the country.

As one of the largest insurers in Canada, we work with many employers to offer access to a wide variety of health services and specifically pharmaceutical drugs through employer sponsored benefit plans. In 2021, we insured approximately seven million Canadians and paid out more than 60 million pharmaceutical claims. Employers and employees value their benefit plans that provide them with access to prescription medicines. However, the costs of pharmaceutical benefit plans are becoming increasingly expensive and plan sustainability is becoming an issue. As such, it is vitally important that the cost of drugs remain consistent and affordable.

We agree with the suggestions as noted in the CLHIA submission to this consultation:

- **Provide clarity in the criteria that would trigger an investigation:**
 - A clear process that will inform what information will be made public and what should not be public is a crucial element to provide confidence and encouragement to stakeholders who see excess list prices to report them through a complaint.

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- **Include Insurance companies, Plan Sponsors and Plan Members as part of the remediation framework for undertakings and excessive price hearing processes:**
 - Remedies for excessive drug pricing currently don't include private payors. Today, if a drug price is considered excessive, the Receiver General for Canada receives payment but Plan Sponsors and Plan Members (private payers) shoulder the excess costs as the amounts awarded are not distributed to these groups. Leaving insurers out of the process leaves our Employers and their employees shouldering the higher cost for a period that the price is deemed excessive.
- **Create transparency for the Domestic Therapeutic Class Comparison (dTCC):**
 - Having transparency and access to the dTCC review by PMPRB would be helpful in making our listing decisions.

We thank the PMPRB for its efforts and the opportunity to provide comments. Should you have any questions, please contact me by email at jessica.brcko@sunlife.com.

Sincerely,

Jessica Brcko

Jessica Brcko

Assistant-Vice President, Government and Regulatory Affairs, Canada (A)