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CPhA Submission on PMPRB Phase 3 Draft Guidelines On behalf of the Canadian Pharmacists Association (CPhA), we appreciate the opportunity to provide feedback on the Phase 3 draft guidelines issued by the Patented Medicine Prices Review Board (PMPRB). We remain committed to ensuring that pricing regulations strike a balance between making medicines affordable for Canadians and maintaining access to innovative therapies while minimizing the unintended financial impact on pharmacies and patient care. In reviewing the Phase 3 draft guidelines, we would like to reiterate our previous recommendations and highlight new concerns:

1. **Transition Period** CPhA continues to advocate for a minimum three-year transition period following the implementation of any new guidelines before existing patented medicines undergo review. This timeline is critical to allow pharmacies, particularly smaller community pharmacies, to adjust to potential changes in pricing, given their lack of access to international list prices and the operational difficulties associated with sudden price fluctuations. Without adequate time for adjustment, pharmacies may face financial instability, leading to disruptions in patient access to medications, especially in underserved communities where pharmacists serve as the primary healthcare providers. A three-year transition would allow pharmacies to stabilize their operations and safeguard the continuity of care.
2. **Six-Month Notice for Pricing Decisions** CPhA reiterates the importance of a six-month notice period for any pricing decisions. This washout period allows pharmacies to manage their existing inventory before the effects of price reductions take hold, thereby avoiding unnecessary financial losses. Such a notice period is essential for business continuity and would provide pharmacies with the opportunity to adjust their purchasing strategies and manage their stock appropriately.
3. **Impact on Smaller and Rural Pharmacies** As previously emphasized, the potential for unintended consequences in rural and underserved communities remains a significant concern. Pharmacies in these areas operate with fewer resources and face additional challenges in adapting to pricing changes. In these regions, pharmacists are often the sole healthcare providers, and any disruption to their operations could severely impact patient care. We urge the PMPRB to carefully consider the broader implications of price reductions on these pharmacies and the vital role they play in ensuring healthcare delivery, especially in areas where access to other healthcare services is limited.
4. **Collaboration with Pharmacists** Pharmacists play a pivotal role in ensuring patients have access to necessary medications, and their expertise is invaluable in understanding the real-world impact of pricing changes. We encourage the

PMPRB to engage in ongoing dialogue with pharmacy stakeholders as part of this process to ensure that any new guidelines are applied in a way that minimizes disruption to pharmacy operations and ultimately benefits patients. Conclusion: CPhA supports the PMPRB's mandate to ensure that patented medicines are priced fairly for Canadians. However, we urge the Board to adopt a measured approach in implementing the Phase 3 guidelines, with a particular focus on ensuring a sufficient transition period, adequate notice for pricing changes, and the inclusion of pharmacists in the decision-making process. These measures will help mitigate the risk of unintended consequences on patient access to medications and the financial stability of pharmacies. Furthermore, due to the ongoing trade dispute between the United States, China, and Canada, and the uncertainty it is causing in the medication supply chain, we strongly recommend postponing the implementation of the guidelines, as moving forward could further destabilize the supply chain. We appreciate the opportunity to provide feedback and look forward to continued collaboration with the PMPRB as this process evolves.