

March 19, 2025

Anie Perrault
Acting Chairperson
Patented Medicine Prices Review Board
Standard Life Centre, Suite 1400
333 Laurier Avenue West
Ottawa, Ontario K1P 7C1

Subject: Daiichi Sankyo Canada's Feedback on the Patented Medicine Prices Review Board's (PMPRB) Draft Guidelines for PMPRB Staff: Administrative Process for Excessive Price Hearing Recommendation (Draft Guidelines)

Dear Ms. Perrault,

We are writing to you today to provide Daiichi Sankyo Canada's feedback as part of the consultation on the Draft Guidelines for PMPRB Staff. We would like to thank you for this opportunity to provide our comments, and to share more information about Daiichi Sankyo Canada. We commend the Patented Medicines Prices Review Board for its goal to provide more clarity to the Guidelines and create a fair and predictable review process.

Daiichi Sankyo Canada was established in 2023, part of the Daiichi Sankyo Group, an innovative global pharmaceutical enterprise with an ambitious goal: to develop therapies that address the most critical medical needs. We create and use cutting-edge science and technology to fight pressing health issues.

In Canada, our focus is oncology. In cancer medicine, we are well positioned to become a global leader. Our goal is a future where cancer is no longer a deadly disease. Leveraging groundbreaking research from our laboratories in Japan, we are experts in the field of Antibody Drug Conjugates (ADCs), which allow the targeted delivery of highly effective medicines directly into cancer cells.

With 15 medicines in our pipeline, we're targeting a wide range of cancers, including breast, lung, gastric, ovarian, prostate, and blood cancers. In addition, we are advancing new treatment modalities, such as nucleic acid and gene therapy. Our aim is to make these high-quality, innovative therapies available to everyone who can benefit from them – as quickly as possible and with a clear patient focus.

Daiichi Sankyo Canada is a proud member of BIOTECanada, and we understand that BIOTECanada has provided a response to this consultation. We would like to take the opportunity to echo our support for BIOTECanada's submission, and in particular, emphasize our support for the aim to provide a more fair and predictable regulatory environment for patentees.

We would like to provide an additional comment on behalf of Daiichi Sankyo Canada. We believe that as part of the Draft Guidelines, more transparency for patentees is necessary during the Initial Review process and, particularly, during the In-Depth Review process. In this current context of rapid currency fluctuations, and as a new patentee operating in Canada, it is difficult to provide certainty and clarity on pricing and its evolution to global



Daiichi-Sankyo

colleagues in such a dynamic and evolving context. We are sensitive to predictability as a factor in our operations.

Once again, thank you for the opportunity to participate in this consultation. As we grow our footprint in Canada, we look forward to working with you in the future, both as a patentee and through participating in the evolution of policies and procedures at the Patented Medicine Prices Review Board.

Should you have any questions or wish to discuss this submission further, please do not hesitate to get in touch with Sarah Douglas, Director of Government Affairs and Strategic Partnerships at sarah.douglas@daiichisankyo.com or by phone at 416-559-3441.

Yours sincerely,

Fatih Yedikardes
Country Manager