



December 20, 2019

Ms. Elena Lungu,
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Ms. Lungu,

Thank you for your presentation on the draft guidelines for Patent Medicine Price Ceilings. On behalf of the Professional Institute of the Public Service of Canada, an organization representing 60,000 public servants as well as thousands of its retired members, we wanted to submit our comments on the draft guidelines.

PIPSC believes that Canada's drug pricing model must be based on efficiency, accessibility and health-outcomes. The proposed changes are far overdue. We are pleased to see the adoption of revised guidelines that will, we hope, correct a long-standing failure of public policy and normalize drug prices in Canada. We urge the PMPRB to continue full steam ahead to put these reforms in place as soon as possible.

We recognize the importance of an evidence-based approach to drug price regulation. In your presentations, we appreciate that you have dispelled the pervasive myth that fair drug pricing limits innovation, delays or prevents drug launches, and discourages research and development. It is important that Canadians know that these concepts are not linked. Fair pricing does not mean less access - if anything, it means more access.

We believe establishing price ceilings by way of *reasonable* international comparison, market analysis and pharmacoeconomics (the cost of a drug vis-a-vis its effectiveness) strikes a balance between rewarding drug innovation and affordability. These changes mark an important step toward the much needed universal public pharmacare plan.

We look forward to working with the PMPRB as it continues to advance toward a more efficient, accessible and fair model of determining drug prices.

Thank you,

Debi Daviau
President, PIPSC

Cc: Colby Briggs, Compensation Team, Team Lead