



The Arthritis Society
393 University Avenue, Suite 1700
Toronto, ON M5G 1E6
Phone: (416) 979-7228 / Toll-Free: 1-800-321-1433
Email: info@arthritis.ca

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Patented Medicine Prices Review Board (PMPRB)
333 Laurier Avenue West, Suite 1400
Ottawa, Ontario K1P 1C1

Re: PMPRB 2020 Draft Guidelines Consultation

Dear PMPRB Board Members,

As a national health charity with a mission to improve the lives of the 6 million Canadians living with arthritis, the Arthritis Society engages in policy discussions related to improving access to treatment and care. This submission builds on our input regarding the PMPRB reforms provided during the 2019 Draft Guidelines consultation earlier this year¹ and is complementary to the submission made by the Health Charities Coalition of Canada (HCCC), of which we are a member.

As outlined in our previous submission, medicines play a vital and often life-changing role in the management of arthritis. Due to the nature of the disease, many arthritis patients experience episodic disabilities as their symptoms become uncontrolled, during which time they are unable to work and have a poorer quality of life. However, there are a range of effective therapies that can help reduce arthritis symptoms and remove some of the barriers preventing patients from enjoying life and participating more fully in the workforce. For this reason, we believe that is critical for arthritis patients to have better and more affordable access to medicines. We fully support and want to contribute to policy reform and initiatives that contribute to this important objective.

¹ https://www.canada.ca/content/dam/pmprb-cepmb/documents/consultations/draft-guidelines/submission-received/2020_02_Guideline%20Consultation%20Submission_Arthritis%20Society.pdf



However, when it comes to regulating medicine prices, a balance is clearly needed – prices should be affordable and sustainable for patients and public and private drug plans, but they cannot become so low or unpredictable that companies are discouraged from launching new medicines or investing in clinical trials and health research in Canada.

There have been concerns raised that the PMPRB's approach may create barriers for the launch or access to some of the most innovative and potentially transformative therapeutic areas, including biologics and precision medicines, which hold significant promise in treating arthritis.

It is critical that arthritis patients have access to a variety of therapies. We encourage the PMPRB to ensure a long-term vision that supports clinical research and encourages the launch of new and emerging and medicines in Canada, while adopting the most cost-effective policies.

With biologics for arthritis for example, the future looks quite promising. At the moment, for many arthritis patients, finding an appropriate treatment is still very much trial and error – what works for one patient may not for another. However, we are now starting to see 'treat to target' solutions based on an individual's genetic markers. And the good news is that for some individuals, a strong dose for a short period of time may put the person in remission. Therefore, we should not assume that many of these emerging therapies necessarily mean high costs in perpetuity – even for chronic diseases like arthritis.

In the coming years, there will likely be fewer 'mass market' therapies and more and more small market solutions. Ensuring that these innovations continue to come to Canada will not only lead to improved health outcomes, but also increased health system savings, as medicines become increasingly precise and are better able to target the patients that will most likely benefit from them.

With respect to the new Draft Guidelines, we remain concerned with the continued intention to apply economic factors to regulate medicine prices. Even though the PMPRB has raised its proposed thresholds, we understand that many promising new therapies will continue to require potentially unsustainable price reductions. We are concerned that regulations could become an obstacle to access.

We encourage the PMPRB to carefully assess its proposed approach to ensure a balance between medicine affordability and access, so that one does not come at the expense of the other. It is imperative that the PMPRB take all perspectives into account when determining the best tools for regulating drug prices, particularly from patients – the people the reforms are ultimately intended to benefit. It is also critical that a transparent review process be established



to monitor and assess the impact of the changes to ensure they are meeting the intended objectives without creating barriers or hindering access. Patient input and experience should be a key component of this assessment.

Thank you once again for considering our input and we look forward to continued opportunities for collaboration and engagement with the PMRPB and other stakeholders on this important matter.

Sincerely,

A handwritten signature in blue ink that reads "Trish Barbato".

Trish Barbato
President and CEO

About the Arthritis Society

The Arthritis Society is Canada's largest charitable source of investment in cutting-edge arthritis research, and a leader in proactive advocacy, education and support towards delivering better health outcomes for people affected by arthritis. Safety and improved care are our top priorities, with our advocacy focused on improving access to care, timeliness of care, and innovative research. The Arthritis Society is accredited under Imagine Canada's Standards Program.