

June 21, 2021



Patented Medicine Prices Review Board
Standard Life Centre, Box L40
333 Laurier Avenue West, Suite 1400
Ottawa, ON K1P 1C1

Subject: Need for an independent third-party to monitor impacts of PMPRB regulations in context of proposed GMEP

As leaders of organizations in the field of cancer research, we are writing to share our concerns regarding the indirect downstream impacts of the Patented Medicine Prices Review Board (PMPRB) regulation changes on the health and quality of Canada's biomedical research ecosystem.

We would like to note that we are not taking a position on medicine pricing. We fully support the government's efforts to improve medicine affordability and access for Canadians. However, we believe that the PMPRB changes could have inadvertent but harmful impacts on the health research ecosystem and it is critical that these impacts be further examined.

In this context, we support the aim of the PMPRB's Guideline Monitoring & Evaluation Plan (GMEP), particularly the intention to monitor changes in research investments, clinical trials, and medicine access. However, it would be inappropriate for the PMPRB to carry out these important assessments due to the obvious conflict of interest.

For this reason, we strongly believe that this work needs to be done by credible, independent experts (e.g., the Auditor General of Canada, Canadian Institutes of Health Research, etc.) in a transparent and open manner, and subject to peer review (ideally international peer review, which is standard practice in the research field, and which can help mitigate any potential conflicts of interest).

In terms of monitoring the impacts of the reforms on research investments, we also recommend providing a role (e.g., observer status) to organizations such as Research Canada or the Canadian Health Research Forum, who understand the health research ecosystem and can provide perspectives about the situation "on the ground."

We would also like to stress that these critical impact assessments need to be conducted prior to the adoption of the regulations (in addition to after) to avoid a potential catastrophe. For this reason, we request that the planned implementation date of the PMPRB regulation changes be pushed back by 6 months – from July 1, 2021 to January 1, 2022.

Thank you for the opportunity to provide our input.

Sincerely,

The Canadian Health Research Forum

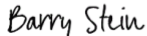
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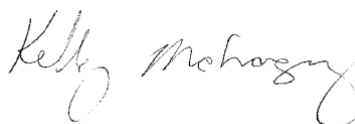
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