



June 20, 2021

Submission to the Patented Medicines Prices Review Board on a Monitoring and Evaluation Plan by COSCO BC.

Thank you for providing an opportunity to the Council of Senior Citizens Organizations of B.C. (COSCO B.C.) to contribute to shaping the development of the Patented Medicines Prices Review Board (PMPRB) Monitoring and Evaluation Plan. We are pleased to be able to do so from the perspective of the 67 seniors organizations across B.C. that COSCO B.C. represents.

We recognize the urgent need for well-researched, reliable, publicly available information to monitor the rapidly changing landscape of patented medicines access and pricing in Canada. COSCO therefore supports this PMPRB Monitoring and Evaluation Plan as an important contribution to transparency and accountability and to ensuring our public health care system remains sustainable.

COSCO also supports the need for PMPRB to provide current information and analysis on an ongoing basis on drug costs, access to new drugs and on the level of R&D investment in Canada that will address the contrary information provided by Innovative Medicines, an alliance of 47 pharmaceutical companies that strongly opposes control of drug prices in Canada.

As seniors we are major stakeholders in this conflict. Older adults as retirees and those aged 65 plus have higher drug costs and account for 40% of spending on drugs.

We understand that the proposed PMPRB evaluation and monitoring plan is grounded in a pharmacoeconomic perspective and is not designed to consider the social or health impacts on populations or sectors of the population, such as seniors, of controlling or not controlling ever-increasing patented medicine drug prices. We urge the PMPBRB to include research on health outcomes in similar developed countries based on

expenditures on drugs. We believe including such an approach would make the work of the PMPRB particularly meaningful to the general public.

We now provide a few further brief comments from the perspective of seniors.

COSTS

Seniors ability to pay for drugs may become even more limited as drug costs increase and extended health benefit plans may become unsustainable over time. On a median income of \$28,000 per year, those age 65 plus often do not have sufficient income to pay for ever more expensive drugs. Current estimates show that about 10% -20 % of Canadians cannot afford to pay for and have to ration necessary prescription drugs. Many are likely to be seniors. It seems logical to us that by controlling drug prices, we strengthen efforts to enact and implement a Canadian pharmacare plan that will ensure that every senior can obtain the drugs they need to maintain their quality of life or even save their lives.

Canadians seniors want and expect to have access to new life-saving patented drugs in a timely manner. Innovative Medicines states on its webpage that it is “committed to listening to the voices and views of Canadians and to include them in decision-making” Many Canadians without access to readily accessible contrary information might tend to agree with this sentiment and their position on drug costs. Public communication on all aspects of drug costs needs to be provided to the general public.

We note that that this PMPRB evaluation and monitoring plan is grounded in a pharmacoeconomic perspective that does not consider the social or health impacts on populations or sectors of the population such as seniors of controlling or not controlling ever-increasing patented medicine drug prices. We urge the PMPBRB to include research on health outcomes in similar developed countries based on expenditures on drugs on its work.

ACCESS

COSCO notes that revisions over time through extensive consultations show that the PMPRB Regulations have already made several concessions to the pharmaceutical industry demands.

COSCO supports the following areas of monitoring related to access:

- Levels of clinical trials in Canada and internationally to explore the relation, if any, between clinical trials and pricing;
- The availability of new medicines in Canada compared with foreign markets, including the time from regulatory approval to actual sale and other factors;

- System coordination at the health systems level to monitor the use patentees make of submitting high treatment cost drugs to CADTH or INESSS and how submissions to these agencies compare with submissions made to Health Technology Assessment in other countries;
- Changes in number or proportion of new medicines with regard to price negotiations with the pCPA
- Changes in trends in reimbursement by both FPT public drug plans and plans that are privately insured
- These data are essential to have a comprehensive overview of access to drugs in the Canadian market as compared to other markets and to identify any areas where improvements are needed.
- These data are needed from an independent body with the aim of protecting the interests of the Canadian public and ensure Canadians receive good value (particularly in terms of health benefits) for the money they pay
- With so much data held privately within drug companies an independent body is essential to shed as much light as possible into the complex world of drug pricing
- While all objectives are important, the key is the Health Technology Assessment.
- Access to medicines – there is a need to report information in clear language in summary formats for lay persons to understand.
- Information on demographics of people most affected by inadequate access would be useful (particularly for older adults).

The Pharmaceutical Ecosystem

COSCO supports the following areas of activity related to monitoring the pharmaceutical ecosystem:

- Drug spending to put spending by individuals, public plans and private insurers in the context of overall health expenditures and GDP; as well to compare per capita spending between Canada and comparator countries to understand the influence of price and utilization;
- Spending on Research and Development including consideration of publicly funded R&D and industry investments that may go beyond the current definitions
- Economic footprint that includes indicators of economic impact of patentee investments, such as employment, profitability and returns

COSCO recognizes that this type of information collected by an independent body is critical to ensuring the Canadian population and decision-makers have clear information

on which to understand the trends in spending on patented medicines that they can apply to their jurisdictions

Conclusion: Process and engaging with Canadians

In the interest of transparency and accountability, communication by the PMPRB with the Canadian public on these very important issues, we suggest, needs to be significantly enhanced.

Information relevant to different sectors of the population that stand to be directly affected by PMPRB decisions needs to be provided using non-technical language and using methods accessible to the majority of the population such as email or Facebook and the media. Twitter which PMRB has been using as its main avenue for public input is not usually a preferred option for an older audience.

Thank you

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