

June 21, 2021

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

Regarding: Consultations on the PMPRB's Guideline Monitoring and Evaluation Plan (GMEP)

Dear PMPRB Board Members,

Life Sciences BC would like to take this opportunity to provide feedback on the recent PMPRB's proposed Guideline Monitoring and Evaluation Plan (GMEP).

Life Sciences British Columbia ("LSBC") is a non-profit member-based society, representing Academic and Research Institutions, Life Sciences innovative companies, Health Organizations and Funding Agencies. On behalf of our members, LSBC has made multiple submissions expressing concerns with the potential negative consequences on the life sciences sector, as a result of the Patented Medicine Prices Review Board (PMPRB)'s new approach to pharmaceutical pricing in Canada.

Since the outbreak of COVID -19, the life sciences sector has been at the forefront of Canada's response to the COVID-19 pandemic. In British Columbia, we are proud of the leading science that has been generated in this Province and its contribution to the global effort to develop effective vaccines and therapeutics to treat this world-wide pandemic. The investment made in this sector has resulted in definable scientific victories that have halted the spread of this deadly virus, while putting Canada on the path to economic recovery.

As we have raised in previous submissions, we believe the new regulations will impact patient care outcomes through delayed or limited access to innovative medicines, reduced investment in patient care programs, deter much needed R & D investment and potentially stifle, an investment sensitive Canadian SME economy and sector growth which is developing innovative solutions to address the complex issues and gaps in our health system. Now is not the time to bring in further uncertainty.

As a result, we recommend the following:

1. Suspend the regulatory changes:
 - As previously submitted through letters and submissions to consultations, we recommend that the scheduled July 1st implementation of the revised PMPRB guidelines be suspended indefinitely until all parties are able to come together to discuss alternatives.
2. Independent 3rd Party Evaluation:
 - Ensure that monitoring and evaluation is completed by an independent and objective 3rd party. This is in line with best practices where the monitoring and assessment should not be completed from within rather at arm's length. The party conducting the monitoring and evaluation should be agreed by all stakeholders.
3. Limit the metrics of the GMEP to solely those within PMPRB's statutory mandate.

It goes without saying that the COVID-19 pandemic has had extraordinary implications on the health system and the Life Sciences sector. One positive implication is that we have experienced collaboration between government, industry, and the health system at unprecedented levels. There is an opportunity to build on that collaboration. Collectively, we should seize the opportunity to come together as stakeholders to develop alternative solutions to the PMPRB proposed guidelines and associated GMEP for the benefit of all Canadians.

Sincerely



Wendy Hurlburt,
President and CEO,
Life Sciences BC