



July 18, 2022

Via PMPRB Consultation Portal

To whom it may concern:

The following document constitutes Amgen Canada Inc.'s ("Amgen" or "we") feedback on the Patented Medicine Prices Review Board's ("PMPRB") proposed *Price Review Approach During the Interim Period following publication of Amendments to the Patented Medicines Regulations*.

We endorse the submissions of Innovative Medicines Canada and BIOTECanada, and ask that PMPRB consider the following points with respect to the proposed interim approach and/or future Guidelines:

- Amgen assumes the interim period will work as planned by PMPRB and the proposed price freeze will not be extended into 2023, given that changes in Consumer Price Index is one of the factors established in the Patent Act.
- Amgen expects PMPRB's proposed guidelines to be observant of its mandate for monitoring patent abuse and excessive pricing. Price tests that create artificial distortions among drugs in the same therapeutic class or place Canada low among the new basket of reference countries are beyond this mandate.

The last two years have revealed the importance of building resiliency in care, driven by better adoption of innovative solutions like medicines, diagnostics, and devices. Building resilience requires a new approach, focused on predictive and preventative care, value-based procurement, and a true public private partnership. Canada needs a policy environment that promotes research and development; enhances the environment for clinical trials; provides timely and value-based access for innovative treatments; and incentivizes and rewards technological innovations in health.

Amgen appreciates the opportunity to provide feedback and looks forward to a constructive discussion this Fall on the proposed new Guidelines.

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