

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

**Boehringer Ingelheim
(Canada) Ltd/Ltée**

Department: Market Access

July 15, 2022

**Re: Patented Medicine Prices Review Board (PMPRB) Draft Guidelines
Consultation**

Submitted via online portal

Dear recipients:

Boehringer Ingelheim (Canada) Ltd. (“BICL”) is pleased to provide feedback on the proposed “*PMPRB Price Review Approach During the Interim Period following publication of Amendments to the Patented Medicines Regulations*” as published by the PMPRB on June 30, 2022, on their [website](#). We are offering the following feedback for consideration by the PMPRB:

Telephone 289-208-0907
E-Mail: carole.bradley@boehringer-ingelheim.com
5180 South Service Road
Burlington, Ontario, Canada
L7L 5H4
Telephone 905-639-0333
Telefax 905-639-3769
www.boehringer-ingelheim.com

ELEMENT 1. To be truly “*status quo*” price increase as per the consumer price index (CPI) method should be allowed and patentees should not be subject to price investigations simply because prices were increased.

ELEMENT 2. The Interim Approach proposed by the PMPRB should include the disclaimer that this will not be the future operating environment for patentees and there will be provision for allowable price increases. The forthcoming guidelines should have the purview of the evolving treatment and therapies landscape in Canada whilst upholding and maintaining its foundational mandate of being a monitor of excessive pricing and patent abuse.

Conclusions

BICL is generally satisfied with the proposed Interim Guidance and the “*status quo*” approach by the PMPRB, until the new guidelines are in place.

We thank you for the opportunity to provide feedback on these proposed guidelines and we would be pleased to discuss the elements outlined in this submission.

Sincerely,



Carole Bradley-Kennedy
Director, Health Economics, Pricing and Outcomes Research