August 14, 2023

CBCN input: Amendment to the Interim Guidance

The Canadian Breast Cancer Network (CBCN) is a leading, patient-directed, national health charity committed to ensuring the best quality of care for all Canadians affected by breast cancer through the promotion of information, education and advocacy activities. We would like to thank Health Canada for the opportunity to comment on the revisions to the PMPRB Interim Guidance, and we appreciate the intent, complexities and importance of this undertaking.

CBCN supports the meaningful engagement of stakeholders during the regulatory improvement process, and hopes that all stakeholders are afforded the same high standard of predictability during drug pricing reviews. There is mounting evidence that breast cancer patients will be disproportionately impacted by new medicines which are excessively priced. For example, oncology drugs made up a third of the market share of drug spending in 2020, and some breast cancer medicines generated more than $500 million in revenue per year[1]. Without a certain timeline for new guidelines, the decision not to subject new drugs as of July 1, 2022 to a retro-active analysis of excessive revenue creates uncertainties for patients because it is unclear when patients can expect excessively priced medicines to be reviewed, and what impact this will have of the cost of drugs.

CBCN is very encouraged by the innovation in breast cancer medicines, including 63 new breast cancer drugs anticipated by the 2022 PMPRB annual report[2], but cost and lengthy price negotiations are a huge barrier for patients, for whom medicines are created. We hope that more certainty about timelines for permanent guidance, and clarity about how the Interim Guidance will impact drug costs can further improve drug pricing review predictability.

[1] https://www.canjhealthtechnol.ca/index.php/cjht/article/view/MT0002/1064

[2] https://www.canada.ca/content/dam/pmprb-cepmb/documents/npduis/analytical-studies/meds-pipeline-monitor-2022/NPDUIS-Meds-Pipeline-Monitor-2022_en.pdf