

August 21, 2023

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

Submitted via the [Consultation Submission Portal](#)

Response to the PMPRB Interim Approach Consultation

On behalf of Elvium Life Sciences (Elvium), we offer this response to the Patented Medicine Prices Review Board (PMPRB) June 20, 2023 [Notice and Comment - Amendment to the Interim Guidance re: New Medicines](#).

On this matter, we are supportive of the position, key recommendations, and concerns raised by our industry association, Innovative Medicines Canada (IMC). We further wish to highlight and reinforce that:

- a) The interim approach and any future PMPRB guidelines should respect and clearly reflect the PMPRB's mandate to monitor for (patent abuse and) excessive pricing, and not encourage or anchor price compliance to "below median" pricing tests.
- b) PMPRB should provide clarity with respect to Non-Excessive Average Prices for 2023 and beyond. PMPRB has publicly posted the 2023 CPI factors yet omitted 2023 NEAPs in their recent compliance reports. Furthermore, additional clarity is required that a price increase alone within the range of CPI for 2023 and ongoing, will not automatically trigger an investigation.
- c) PMPRB needs to commit to and clearly communicate a transition timeline of at least two reporting periods following the current interim period and after finalization of the new guidelines, in order to ensure orderly adjustment to new pricing regime.

Thank you for the opportunity to provide comment. Elvium joins IMC in looking forward to the PMPRB engaging with industry stakeholders in a collaborative discussion on these and final Guidelines.

Sincerely,

Melanie Milburn
General Manager, Elvium Life Sciences