



Thomas J. Digby
Patented Medicine Prices Review Board Box L40
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August 21, 2023

Mission :
Make
Myeloma
Matter

Dear Mr. Digby,


Mission :
Maîtriser
le Myélome


Myeloma Canada greatly appreciates the PMPRB's effort to listen to stakeholder feedback and create guidelines that balance the importance of bringing new medicines to Canada with the importance of these drugs being affordable and accessible to Canadians— through minimization of uncertainty in the review process. We support the proposal's aim to *'provide an expedited assessment for these New Medicines' prices while at the same time affording more time to advance a fulsome consultation process on the new guidelines.'*, as we certainly agree further consultation is necessary to finalize new PMPRB guidelines which will work for the benefit of *all Canadians*.


The proposed process for reviewing a possibly excessively priced medicine has *no timeline or specific criteria of evaluation*, which is of particular concern because there is no guarantee when the new PMPRB guidelines will be finalized and implemented, nor any assurance regarding how long a review might take following their implementation. Thus, deciding to introduce an expensive new drug to the Canadian market represents a significant and open-ended investment for pharmaceutical companies, who may well incur serious losses if the eventual review determines their drug to be excessively priced. Similarly, the composition of the PMPRB11 makes it very difficult to foresee a situation in which a price review is NOT triggered. As important as it is to improve affordability and lower drug prices in Canada, this goal should not jeopardize access to new lifesaving treatments for Canadians who desperately need them to survive.

Myeloma Canada is grateful for the opportunity to comment on the PMPRB's current proposal, and we look forward to further engaging with the PMPRB on the ongoing development and implementation of new guidelines.

Regards,


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