

August 15, 2023

Sherri Wilson, Director
Board Secretariat
Patented Medicine Prices Review Board
Government of Canada
submitted electronically via PMPRB.Consultations.CEPMB@pmprb-cepmb.gc.ca

Re: Notice and Comment – Amendment to the Interim Guidance re: New Medicines

Dear Members of the Board,

Thank you for the opportunity to provide input. We appreciate the intent of PMPRB in establishing an interim process to address the growing backlog of reviews for new medicines while the new Guidelines are still under development.

We have always endorsed the implementation of the new basket of PMPRB11 countries. We have stated this in all our past submissions to the PMPRB, since the beginning of its modernization efforts in 2018, when the Steering Committee, of which I was a member, was formed.

We support the use of the PMPRB11 list prices to expediate the review process for applicable medicines that fall below the median international price (MIP). This would have great impact, as PMPRB has stated that 55% of New Medicines fall under this category. However, the Interim Guidance needs to clarify whether medicines that have a list price at the MIP will also fall under the same category as “reviewed”. It is also not known what categories of new medicines fall under the remaining 45% and what proportion of it are medicines that have list prices above MIP, which would be “under review” until new Guidelines are in place. If this percentage is significant, these amendments might fall short in addressing the growing backlogs and present a barrier to timely access to medicines.

We hope that the upcoming draft Guidelines will include opportunities to submit patient input into PMPRB’s decision-making processes regarding new patented medicines. As we’ve submitted in past consultations, future Guidelines must be efficient, not duplicate existing systems and pathways, and work collaboratively with other regulators and agencies in Canada’s drug approval process.

It is vital to always keep in mind that the person living with a disease or disorder is the object of the healthcare purpose. We must meet the needs of Canadians in all aspects of health, including health promotion and prevention, and provide timely, affordable access to the care they need.

We look forward to participating in future engagements and consultations on a new set of guidelines later in the year. We also welcome other opportunities to discuss achieving healthcare savings while protecting patients’ continuity of care and access to innovative and effective therapies.

Yours sincerely,



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