



Canadian
Cancer
Society

Patented Medicine Prices Review Board: Notice and Comment

Canadian Cancer Society submission August 2021

The Canadian Cancer Society (CCS) appreciates the opportunity to comment on three proposed amendments to the new PMPRB Guidelines related to the decision to delay the coming-into-force date of the Regulations Amending the Patented Medicines Regulations ("Regulations") a further six months, from July 1, 2021 to January 1, 2022.

Introduction

Cancer is a disease that can affect anyone; it is estimated that nearly 1 in 2 Canadians will develop cancer in their lifetimes and 1 in 4 will die of the disease. In 2020, there were an estimated 225,800 new cancer diagnoses and 83,300 deaths from cancer in Canada. Despite the progress we've made, the number of new cancer cases continues to increase as a result of the growing and aging population. Between 2015 and 2030, the number of new cancer cases diagnosed is expected to increase about 40%. During the past two decades, cancer treatment options have significantly improved. Notably, cancer medications have played an essential role to improve health outcomes and quality of life for people living with cancer.

Proposed amendments

To date, CCS has provided input to every formal consultation that was issued by the PMPRB regarding the modernization of the Patent Act and changes to the guidelines. As such, we are interested to continue to be engaged to ensure equitable access to medications for people with cancer.

The proposed amendments, on the change to the definition of Gap medicines, the references to the comparator countries and the international price tests for Grandfathered medicines and their line extensions are not a cause for concern, however, we would like to take this opportunity to re-iterate our previous concerns. In all CCS submissions, we have recognized the complexity of balancing competing interests in the development of the new guidelines. CCS would like to use this opportunity to re-iterate our recommendations:

1. Ensure that continued investments in research in Canada take place, including a robust clinical trial ecosystem and that all new innovations are rapidly adopted by the healthcare system to maximise patient benefit
2. Ensure that Canadians with cancer receive access to treatments without financial hardship, regardless of where they live
3. Implement a phased approach of the PMPRB guidelines.
4. Ensure the PMPRB releases the data publicly that was used to inform the development of the revised PMPRB guidelines.

About us

The Canadian Cancer Society (CCS) is national community-based organization of volunteers whose mission is the eradication of cancer and the enhancement of the quality of life of people living with cancer. Our vision is to create a world where no Canadian fears cancer. Our collective includes people living with cancer, their families and friends, healthcare teams, donors, researchers, scientists and CCS staff and volunteers. With the help of hundreds of thousands of people that CCS brings together, we are a force-for-life in the face of cancer. As Canada's largest health charity, we fund world-class research, advocate for strong health policy, and help people with cancer and their families by providing evidence-based information on cancer-related issues.