

August 31, 2021

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

Subject: Notice and Comment – 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 (July 15, 2021)

Dear PMPRB Board Members,

Life Sciences British Columbia (“LSBC”) would like to take this opportunity to provide feedback on the Patented Medicine Prices Review Board (“PMPRB”)’s July 15, 2021 proposals.

LSBC is a non-profit member-based society, whose members consist of academic and research institutions, life sciences innovative companies, health organizations, life science service providers and funders. On behalf of our members, LSBC has made multiple submissions expressing concerns with the potential negative consequences and indirect downstream impacts on the life sciences sector as a result of the PMPRB proposed new approach to pharmaceutical pricing in Canada.

In Canada, we are fortunate to have world-leading research institutes, universities, small, medium, and large life science companies working together, with global partners, to advance science and medical discoveries. As a result, since the outbreak of COVID-19, the life sciences sector has been at the forefront of Canada’s response to the COVID-19 pandemic. In British Columbia, we are proud of the leading science that has been generated in this province and its corresponding contribution to the global effort in the development of critical and effective vaccines and therapeutics to address the challenges of the pandemic. The investment made in this sector has resulted in definable scientific victories that have stalled the spread of COVID-19, while putting Canada on the path to economic recovery.

As we have raised in previous submissions, we believe the new proposed PMPRB regulations will adversely impact scientific discovery and patient care outcomes through delayed or limited access to innovative medicines, deter and/or reduce investment critical research and potentially stifle investment in life sciences companies at a time where the sector is so critical to developing innovative solutions to address the complex issues and gaps in our health system. Now is not the time to bring in further uncertainty.

As a result, we recommend that the recently proposed *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* be not implemented.

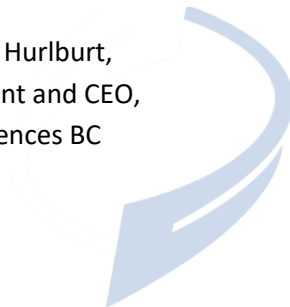
The life sciences sector is critical to Canada's economic recovery and through the continued development of innovative products, solutions and services, the sustainability of our much-valued health system. In that light, LSBC was pleased to see this recognized through the collaboration between the Minister of Innovation, Science and Industry and the Minister of Health in the recent announcement of the Federal Biomanufacturing and Life Sciences Strategy and the associated 5 pillars. The 5th pillar of "enabling innovation by ensuring world class regulation" is essential.

It goes without saying that the COVID-19 pandemic has had extraordinary implications on the health system. Through the pandemic we experienced unprecedented collaboration between government, industry, and the health system. There is an opportunity to build on that collaboration. Collectively, we should seize the opportunity to come together as stakeholders to develop alternative solutions to the PMPRB proposed guidelines and ensure that, as the Federal Biomanufacturing and Life Sciences strategy details that Canada is best positioned to enable "innovation by ensuring world class regulation for the benefit of all Canadians".

Sincerely

A handwritten signature in blue ink, appearing to read "Wendy Hurlburt", is positioned above the printed name.

Wendy Hurlburt,
President and CEO,
Life Sciences BC



LifeSciences
British Columbia