



PULMONARY HYPERTENSION
ASSOCIATION OF CANADA

L'ASSOCIATION D'HYPERTENSION
PULMONAIRE DU CANADA

7 April 2026

Patented Medicines Prices Review Board (PMPRB)
333 Laurier Avenue West, Suite 1400
Ottawa, Ontario K1P 1C1

Via Online Submission Form

Re: Consultation on the Patented Medicine Prices Review Board (PMPRB) Proposed Practice Directions

Dear Members of the PMPRB,

The Pulmonary Hypertension Association of Canada (PHA Canada) is a charity that works to better the lives of Canadians affected by pulmonary hypertension and represents a united national pulmonary hypertension community. Fewer than 4,000 Canadians have pulmonary arterial hypertension (PAH), a rare, clinically distinct, complex subtype of pulmonary hypertension. For patients with pulmonary arterial hypertension and many others with rare diseases, access to new, innovative medications and improved access to existing ones is essential for enhancing their health outcomes and quality of life.

As an organization representing patients with a rare disease, our comments address four of the seven proposed practice directions:

1. Proposed Practice Direction on the Mode of PMPRB Hearings

Presumptively virtual "live" hearings may benefit presenters. Presenting virtually and/or in writing reduces time pressure and allows for more potential support or assistance for presenters.

4. Proposed Practice Direction on Electronic Filing and Page Limits

The requirement to have documents in 12-point Times New Roman or Arial and for documents to have substantial margins increases accessibility by making documents readable by people with a wider range of visual abilities.

6. Proposed Practice Direction on the Use of Artificial Intelligence (AI) in Proceedings

We appreciate that disclosure of any AI usage when preparing materials will be required, that parties must exercise careful, informed and ongoing oversight of AI, and that the parties remain responsible for ensuring the accuracy of their materials.

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7. Proposed Practice Direction on Virtual Proceedings

We agree that virtual hearings reduce travel expenses and time commitments and require less exertion from presenters. We also applaud the flexibility of virtual hearings and the opportunity they provide to increase public access and transparency.

We appreciate the PMPRB's openness in conducting this consultation. We look forward to following the implementation of these new procedures and any next steps the PMPRB undertakes.

Sincerely,

Joan Paulin
Chair, Board of Directors

Jamie Myrah
Executive Director

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