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December 20, 2023

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

Subject: PMPRB November 2023 Scoping Paper on Guidelines

Dear PMPRB board members,

Thank you for the opportunity to provide input on the PMPRB's new scoping paper.

CARP is Canada's largest advocacy association for older Canadians. Backed by more than 225,000 members, our non-partisan organization is committed to working with all parties in government on issues affecting older Canadians, including equitable access to health care, financial security, and freedom from ageism.

In this context, CARP is pleased to offer several general considerations – which fall predominantly under themes 5 [Relation to pan-Canadian Health Partners, Insurers (Private and Public); and Alignment with Broader Government Initiatives] and 6 [Engaging with Patients, Health Practitioners, Pharmacy, and other Stakeholders] of the discussion paper – to help inform the PMPRB's future approach.

We would like to start by stressing that access to medicines is very important for older Canadians. As health problems rise with age, Canadian seniors depend on medicines to treat their increasingly challenging and often life-threatening conditions. One of the most concerning of these conditions is cancer, which disproportionately affects older Canadians. Approximately 88% of new cancer diagnoses and 95% of cancer deaths occur among Canadians over 50 years of age.¹

The ability to access new treatments for cancer and other serious illnesses, like Alzheimer's and dementia, is critical to increasing survival rates and improving overall quality of life. Canadians can see that there are many very promising new treatments becoming available in other countries, and seniors in particular want to make sure they are available here.

It is worth noting that Canada's access to new medicines is currently suboptimal. One recent study suggested that Canada ranks near the bottom (10th out of 14 other high-

¹ <https://www.canada.ca/content/dam/phac-aspc/documents/services/publications/diseases-conditions/fact-sheet-cancer-canada/fact-sheet-cancer-canada.pdf>



income countries) when it comes to attractiveness for new medicine launches.² This means we often wait longer than other countries to get the newest and most innovative treatments. We can and must do a better job of getting these medicines to patients more quickly.

For this reason, **whatever approach to drug price regulation the PMPRB ultimately decides to take, care must be taken to ensure it does not further impede or erode access to promising new treatments.**

Furthermore, as the PMPRB develops its strategy, it should consider how its role fits into the broader context of health care in Canada. A holistic perspective is crucial, one that considers not only the cost of medications but also their value in terms of patient outcomes and overall impact on the health system and economy. The PMPRB should also be mindful of its role in relation to other important players in the system, including CADTH and provincial and territorial governments, who also play a key role in driving medicine prices lower.

To that end, we encourage the PMPRB to engage actively and collaboratively with all stakeholders in the healthcare sector to support the development of well-rounded policies that address the diverse needs and challenges faced by older Canadians in accessing necessary medications. We trust that the PMPRB will carefully consider these points as it aims to finalize its pricing guidelines in the coming year.

Thank you once again for the opportunity to provide input.

Sincerely,

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The Canadian Association of Retired Persons (CARP) is a national, non-partisan, non-profit organization that advocates for financial security and improved health care for Canadians as we age. With over 225,000 members and 25 chapters across Canada, CARP Canadians. CARP advocates on behalf of older Canadians with all levels of government and collaborates with other organizations on health, ageism, housing, and financial issues.

www.CARP.ca

² <https://www.pdci.ca/wp-content/uploads/2022/06/PDCI-Biopharmaceutical-Ecosystem-Index-June-2022.pdf>