



Canadian
Pharmacists
Association

Association des
pharmaciens
du Canada

**CPhA SUBMISSION TO THE
PATENTED MEDICINE PRICES REVIEW BOARD**

December 6, 2023



Good afternoon, my name is Glen Doucet, and I am the CEO of the Canadian Pharmacists Association. Our association serves as the national voice of over 40,000 pharmacists across Canada, and our focus is on advocating for policies that enhance patient care and access to medications.

I first want to both acknowledge and thank the leadership of the PMPRB Board for reaching out to the pharmacists and the pharmacy community to hear our perspectives on this very important issue. Pharmacists are the last point of contact between a patient and their medications, making the profession particularly knowledgeable and sensitive to the downstream impacts of pharmaceutical policies and pricing decisions.

Today, I will address the two primary concerns we have regarding these new regulations—which are somewhat referenced in sections 2, 5 and 6 of the scoping paper. First is the absence of grandfathering for existing drugs and its impact on pharmacy and the patients they serve; and, second is the potential unintended impacts of the proposed regulations on the security of Canada’s drug supply.

Without being alarmist, access to medications in Canada has never been more precarious and we spend a significant amount of our time helping Health Canada manage these highly disruptive shortages.

Currently, pharmacists on average spend 20% of their time managing shortages which is about 1 and ½ days per week. That means less time providing medication management services; that means less time in administering flu and COVID vaccines; and that means less time providing other essential primary care services that they could be providing to you and me. In a health care system where access is vital to health and wellness, we all need to take responsibility in ensuring drug policy in Canada won't further exacerbate our drug supply security.

With our drug supply in mind, we've repeatedly encouraged all levels of governments to review their pharmaceutical policies, including pricing, not only to do no harm but to actually focus on making policy changes that will address both the security of our drug supply and further ease the unpredictability in Canada's drug market.

In consideration of such security and access to pharmacist medication management care, I did want to bring to your attention our concerns regarding the issue of grandfathering.

We have repeatedly urged PMPRB to assess and consider the downstream impacts of the proposed guidelines on pharmacies and others within the drug supply chain. We, and others who have presented over the past two days, have provided evidence of those impacts, including on patient care and on the viability of pharmacy, especially in underserved areas in Canada. We feel that these impacts have yet to be considered or recognized in the development of these guidelines.

At a time when more Canadians than ever are relying on pharmacy teams for their primary care needs, it's important that PMPRB fully understand the negative impact that the application of the new regulations on existing medications will have on the viability of pharmacy and their ability to provide that patient care. By grandfathering drugs already on the Canadian market, we can help safeguard medications that patients are already using against pricing policies that could impact availability and support programs.

To clarify this issue further, it's important to note that pharmacies are constantly investing in and adapting their infrastructure to ensure the safety and security of the supply chain from manufacturers all the way to the patient. By subjecting these drugs to a new pricing structure with the explicit intention to reduce prices, in a context of increasing operation costs and historically high inflation, we anticipate a significant downstream impact on the ability of pharmacies to provide the level of care that Canadians have come to expect.

Predictability is also essential for pharmacies. There's a misconception that governments buy drugs, when in fact it is pharmacies that buy drugs, and are ultimately reimbursed by governments or private insurers. The new regulations provide no predictability for pharmacies that have to make purchasing decisions without knowing if the price will drop between the time they buy the drug and updated list prices as determined by the new regulatory framework.

The anticipated financial impact of applying the new regulations and guidelines to existing medications on pharmacy is substantial. These impacts will be even more acute for pharmacies in rural and remote communities across Canada that already face higher operational costs. In

these communities, pharmacies are sometimes the only health care option available to Canadians.

Given these impacts, we're again recommending that:

The new regulations should not apply to existing medications.

Failing that, then the PMPRB reserve the reassessment of existing patented medicines to be responsive to specific issues, for example responding to complaints regarding the price of a medicine as to limit the number of drugs to be re-benched.

...and finally,

If a reassessment occurs, that the PMPRB work with governments and stakeholders to coordinate adequate washout periods, allowing pharmacies to manage their inventory accordingly and minimizing the risk of disruption for patients.

Our second concern deals with the unintended consequences that these guidelines may have on access to existing and new medicines in Canada. Once again, it's pharmacists who are on the frontline of this issue and see patients everyday who can't access their medications due to supply insecurity. Pharmacists also see patients everyday who could benefit from new medications that simple aren't available to them.

While we agree that governments need to protect the system from excessive prices for medications in Canada, we need to ensure an appropriate balance between access, affordability, and appropriateness. We are increasingly becoming concerned that the singular focus on price is having a detrimental impact on the greater drug and health care ecosystem in Canada.

When it comes to access, price is an important factor in terms of accessibility, but it's not the only variable. In fact, recent experiences have shown the importance of having a robust pharmaceutical presence in Canada and ensuring that Canada is an appealing market for manufacturers.

The COVID procurement process demonstrates that having a multitude of alternative products can protect Canadians from unintended supply issues. We are concerned that the new regulations will lead to an uncertain framework and has the potential to disincentivize companies from prioritizing supply to Canada now and into the future.

Also, it must be recognized that Canada has issues with respect to the availability of innovative medicines. The excessive time to list in Canada (one of the worst in the world), negotiation backlogs, multi-level review processes, price uncertainty and general inertia is making Canada a less attractive place for drug manufactures to build a presence and to launch new drugs. Again, this can have a direct impact on the security of our drug supply and patient care.

I think the COVID pandemic demonstrated the instability that exists in Canada's access to medications. Since then, the federal government has been working with stakeholders like us to address security and availability of medications in Canada.

More than ever, we need a whole-of-government approach to ensure the security of Canada's drug supply. We all need to have an eye on the bigger picture of the security of our drug supply and understand both the potential and the real downstream implications that any individual policy may have on that goal.

We therefore urge PMPRB to consider such implications moving forward and we again commend the Board for listening and considering our concerns today. I know that PMPRB is equally concerned in our collective responsibilities in creating an environment that further protects and enhances the security of Canada's drug supply.

Thank you.