

December 20, 2023

Submitted via the PMPRB Website: Consultation Submission Portal

RE: Patented Medicines Prices Review Board (PMPRB) - Response to the November 2023 Scoping paper for the consultations on the Board's Guidelines

On behalf of Ipsen Biopharmaceuticals Canada Inc., we agree with the comments brought forth by Innovative Medicines Canada (IMC) with regards to the PMPRB's 2023 Scoping paper for the consultations on the Board's Guidelines.

Ipsen strongly believes that timely access to innovative medicines is a major Canadian public policy issue, given that patients have less access to these treatments than patients in other G7 nations and in many OECD comparator nations. This is due to many factors, including without limitation regulatory inefficiencies and duplication, narrow and inflexible Health Technology Assessment (HTA) recommendations, and the application of processes designed for conventional pharmaceutical products to complex new technologies. The PMPRB's Guidelines must be considered in this broader access context and the range of related government pharmaceutical policies and priorities. Access and availability, together with other important sectoral policies such as the Agile Licensing, the Biomanufacturing and Life Sciences Strategy, and the National Strategy for Drugs for Rare Diseases, will be enhanced and supported by a clear and appropriately limited excessive pricing regime.

We fully support and endorse the comments made by IMC and ask that you consult further for a more detailed examination of industry's comments and concerns with the principles as currently proposed. We appreciate the opportunity to provide input in the PMPRB consultation process and trust that you will take our comments into consideration.

Sincerely,

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Christine Mossa HBSc., PMP, RAC Senior Director, Regulatory Affairs, Public Affairs, Value & Access

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