

May 4, 2021

The Honourable Patty Hajdu, PC MP  
Minister of Health  
Health Canada



Dear Minister Hajdu,

On behalf of Innovative Medicines Canada (IMC) and our membership, I am writing to request that the July 1, 2021 implementation of regulatory changes to the Patented Medicine Prices Review Board (PMPRB) be suspended until the COVID-19 pandemic has abated.

IMC commends the federal government for previously suspending the implementation of the PMPRB regulatory changes due to COVID-19, and respectfully submits that the same rationale regrettably continues to apply today. Despite progress with respect to vaccinations, there is no plausible scenario in which the pandemic will have abated by the current implementation date, and the emergence of new variants suggests that the current public health crisis will persist for many months to come. The collective priority of Canadian governments, our industry and other health stakeholders has been and must continue to be the fight against COVID-19.

The impending PMPRB changes continue to have a destabilizing effect and are strongly opposed by industry, patient groups and life sciences stakeholders due to concerns about impacts on access to new innovative medicines and Canada's future domestic life sciences capacity. While the recent recommitment in Budget 2021 to funding and developing a strategy for drugs for rare diseases is laudable, the PMPRB changes represent a major deterrent to bringing such life-saving and life-improving treatments to Canadian patients, and therefore must be reconsidered.

As our industry has noted on many occasions, we understand the financial constraints facing all levels of governments in Canada. We have proactively advanced potential policy options and remain willing to work with the government on an expedited basis to arrive at a solution that would achieve the policy objective of lowering drug prices and generating savings, without undermining patients' access to potentially life-saving new medicines, clinical trials in Canada, or investment in this country's life sciences sector.

Notwithstanding the challenge of the PMPRB regulations, we believe that the pandemic has changed the nature of the industry's relationship with Canadian governments for the better. Looking beyond



COVID-19, the federal government has recognized that there is an urgent need to increase our national biomanufacturing capacity. Canada has a once-in-a-generation opportunity to make significant progress towards this objective but will need to stand out in a crowded field of international competitors. Revitalizing Canada's life sciences sector will require a holistic and coordinated strategy by Canadian governments in partnership with industry, academia, and other stakeholders. One component of a successful life sciences strategy is ensuring that cost containment measures are both reasonable and predictable, and the PMPRB changes are neither.

Throughout the pandemic, IMC's member companies have demonstrated their unwavering commitment to Canadians, and the strong partnership forged with government departments, ministries and agencies is gradually turning the tide. Our industry stands ready to continue this partnership beyond COVID-19, and pledges to work with the federal government to expand and revitalize the Canadian life sciences sector.

On behalf of our membership and the patients we serve, I look forward to your response.

Sincerely,

Pamela C. Fralick  
President

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