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November 8, 2022

The Honourable Mary Ng, P.C., M.P.

Minister of International Trade, Export Promotion, Small Business and Economic

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Dear Minister:

On behalf of Innovative Medicines Canada (IMC), I am writing to share our concern that the Patented Medicine Prices Review Board's (PMPRB) revised draft Guidelines will make it even harder for Canadians to access new, life-saving medicines, and to request that you call upon the PMPRB to suspend its current consultation process to allow for meaningful consultation with industry, patient groups, and other stakeholders.

The Guidelines changes released for consultation on October 6th create a completely novel regime for the companies subject to the PMPRB's jurisdiction. Our analysis, which will be submitted to PMPRB in response to the consultation, will outline our significant concerns. However, the consultation process ends on December 5th, and the PMPRB has advised that it intends to finalize and implement the changes at the beginning of 2023. This expedited timeframe is completely inadequate given the importance of the Guidelines and their potential impact on patient access to new medicines in Canada.

Presently, only 18 per cent of new medicines launched globally are available to Canadians on public plans. Unless the PMPRB's draft Guidelines are significantly altered, they will further reduce access to new medicines for Canadian patients.

Timely access to new medicines saves lives, helps reduce health care costs, contributes to economic productivity, and makes Canada a more attractive destination for investment and launching new medicines. As Minister of International Trade, Export Promotion, Small Business and Economic Development, you can appreciate that as we advance the partnership between government and industry to strengthen our universal public health system, including the fight against COVID-19, innovative patented medicines are more critical than ever before. It is essential that we protect Canadian supply chains and ensure Canada's trading relationships are mutually beneficial to ensure timely market access. As you are undoubtedly aware, our interest in supporting the government with open and rules-based trade goes beyond just the WTO IP TRIPS waiver.



Additionally, by acting as a deterrent to future drug launches, the Guidelines are at odds with the government's commitment to a National Strategy for Drugs for Rare Diseases and the Biomanufacturing and Life Sciences Strategy. The draft PMPRB Guidelines undermine progress toward these outcomes, as well as other priorities in your mandate letter.

There is a better path forward, one that puts patients at the centre of our health care systems and that will encourage investment in Canada: it starts with a commitment from all stakeholders – governments, industry, patients, and researchers – to work together. The rapid response to the COVID-19 pandemic is a perfect example of what can be achieved when government and industry work collaboratively.

To that end, we are requesting a meeting to discuss next steps for an appropriate consultation on the PMPRB's revised draft Guidelines at your earliest convenience. We look forward to working with you and your colleagues to ensure that Canadians always have access to the medicines they need, when they need them.

Sincerely,

Pamela C. Fralick
President