

# INCREASING ACCESS TO INNOVATIVE MEDICINES

Written Submission for the Pre-Budget Consultations in  
Advance of the 2025 Ontario Budget

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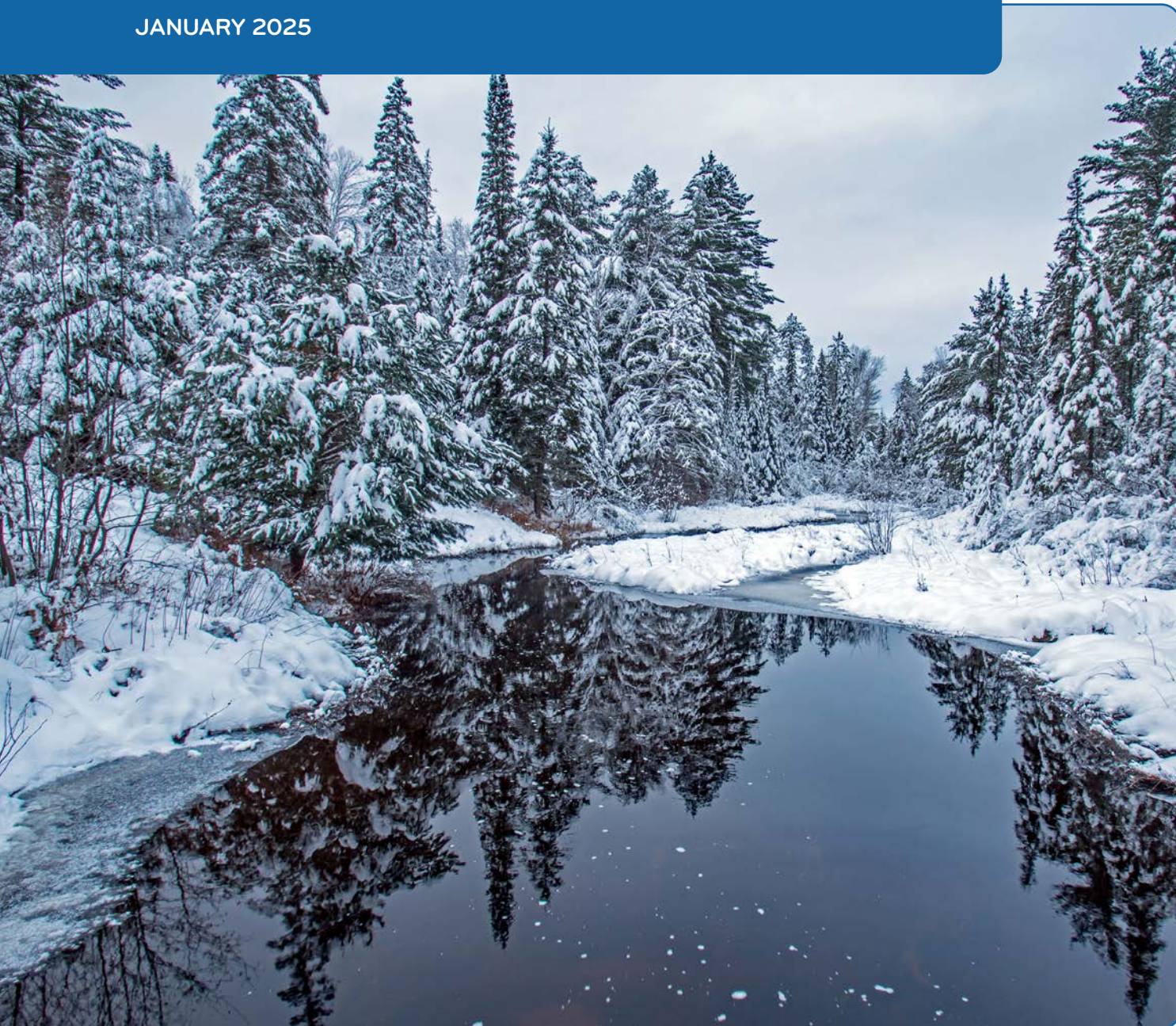


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## INTRODUCTION

Canada's healthcare system is in crisis, and Canadian patients deserve access to healthcare innovation<sup>1</sup> that delivers the total health that they expect. Innovative medicines play an essential role in keeping Canadians healthy and relieving pressure on healthcare systems. However, Canadians are waiting too long for the medicines they need, and sometimes they cannot access important new treatments. Only 18% of new medicines launched globally are available through Canada's public drug plans, while the OECD average is 28%<sup>2</sup>. In addition, Canadians wait two years, on average, for access to new medicines through public drug plans following Health Canada approval<sup>3</sup>.

Innovative Medicines Canada (IMC) contributes to the total health of Canada and, for decades, has driven healthcare innovation. IMC supports over 100,000 high value jobs, with 56,000 of those jobs in Ontario, invests \$2.4 billion in R&D, and contributes \$8.7 billion to the Ontario economy each year<sup>4</sup>.

Collaboration between our industry and government to create policies and regulations that help position Canada as an attractive destination for future R&D and life sciences investments is critical. Canadian scientists and clinicians benefit from exposure to cutting-edge scientific developments, and patients benefit from early access to innovative medicines through clinical trials. It helps to ensure that Canada remains competitive with other jurisdictions within the global life sciences sector.

IMC has developed this submission in advance of Ontario's 2025 Budget, presenting a path forward that places the focus on Ontario patients and getting them the life-saving medicines and vaccines they need as soon as possible. IMC looks forward to engaging meaningfully with government to find collaborative solutions that benefit all people living in Ontario and Canada.

<sup>1</sup> Healthcare innovation in this context refers to: innovative treatments which use the best available science and technology; seamless care pathways, including better screening and diagnostics; and the expanded use of health data and real-world evidence to improve healthcare decision-making at the individual, system, and population levels.

<sup>2</sup> PhRMA (2023), *Global Access to New Medicines Report*.

<sup>3</sup> Conference Board of Canada (2024), *Access and Time to Patient: Prescription Drugs in Canada*.

<sup>4</sup> Statistics Canada (2023), *The Canadian Research and Development Pharmaceutical Sector, 2020*



## ABOUT IMC

Innovative Medicines Canada represents Canada's innovative pharmaceutical industry. IMC helps its members discover, develop, and deliver innovative medicines and vaccines, and contribute to the life sciences ecosystem across Canada. Guided by a strict Code of Ethical Practices, IMC members work with governments, private payers, healthcare professionals, and stakeholders to contribute to the total health of Canadians.



## RECOMMENDATION 1

### PROCEED WITH AN ONTARIO-LED ACCELERATED ACCESS PROGRAM

Canadian patients wait approximately two years after Health Canada's regulatory approval to gain public access to innovative medicines on public plans, and in Ontario this delay includes an average of over five months to make drugs available to patients on its public formulary<sup>5</sup>. Without improved availability and timely access to new medicines, the province could be at a detriment for the best health outcomes for Ontarians, saving lives and creating an attractive ecosystems for more life sciences investments. If Ontario, operating Canada's largest public drug plan, can contribute to reducing the total time it takes for medicines to reach patients, this achievement will also create a more attractive destination for research investment, clinical trials, and biomanufacturing.

IMC applauds the collective agreement amongst Canada's Premiers to take meaningful action that speeds up provincial listings of life-saving medications, as announced by Premier Doug Ford at the December 2024 Council of the Federation press conference in Toronto.

IMC recognizes the importance of collaboration in achieving these goals and supports the Premiers' call for all stakeholders—including drug manufacturers—to work together to deliver on this initiative. By ensuring that patients can benefit from Health Canada-approved treatments through initiatives including but not limited to Project Orbis, his call for action marks a critical step toward closing access gaps that can arise immediately following a positive recommendation by Canada's Drug Agency, ultimately improving healthcare outcomes not only across the country but also across the country.

- 1.1** IMC requests that the Ontario government announce an accelerated access framework by the end of Premier Ford's term as Chair of the Council of Federation. IMC and its members remain committed to working with all levels of government, especially health ministers and drug plan managers across the provinces, to make this vision a reality and accelerate access to innovative medicines for Ontarians and patients across Canada.

<sup>5</sup> Conference Board of Canada (2024), *Access and Time to Patient: Prescription Drugs in Canada*.

## RECOMMENDATION 2

### DO NOT ENGAGE IN PHARMACARE BILATERAL DISCUSSIONS WITH THE FEDERAL GOVERNMENT & REJECT BULK PURCHASING STRATEGY

In its current state, the federal pharmacare model would put Canadians' existing drug coverage at risk and reduce their access to new medicines. Reducing patient access to new treatments will reduce quality of life and put even more strain on the Ontario healthcare system. Furthermore, there would be fewer international investments in made-in-Canada innovations, thereby further reducing Canadian productivity.

- 2.1** As the largest province, Ontario plays a critical role in how the federal pharmacare bill will impact Canadians' access to innovative medicines. Given the federal political climate, we recommend the Ontario Government not engage in pharmacare bilateral negotiations.
- If a bilateral negotiation occurs, IMC advocates for the importance of filling the gaps in existing coverage for Ontarians who do not currently qualify for private or public coverage. For Ontario specifically, the focus should be on ensuring access for those who currently do not have sufficient coverage, which can be achieved for example by expanding the coverage of OHIP+ to the ages of 25-64.
- 2.2** As an additional implication of Bill C-64, the province of Ontario should reject a Bulk Purchasing Strategy (currently being drafted by Canada's Drug Agency). If private insurers access publicly negotiated discounts through a bulk purchasing approach, it will introduce further complexity and delay and reduce access to new drugs for Ontarians.
- The private insurance industry has all the necessary tools to maintain the sustainability of employer sponsored drug benefits. In the last several years, insurers have invested in negotiation teams and receive direct discounts from manufacturers to meet the needs of their clients. Private drug insurance delivers access to medicines in nearly half the time compared to those on public plans. Waiting for public plan listings and negotiations will delay access for Ontarians with employer sponsored drug plans. Allowing private insurers access to publicly negotiated discounts will also result in smaller discounts for Ontario. The discounts manufacturers can offer to the public plans are determined based on total market calculations including higher prices from the private insurance providers.

## RECOMMENDATION 3

### CONTINUE TO STRENGTHEN AND PRIORITIZE ONTARIO'S LIFE SCIENCES SECTOR, AT THE FOREFRONT OF HEALTH AND ECONOMIC DEVELOPMENT POLICY CONVERSATIONS

IMC commends the Ontario government for its announcement of a \$146 million investment in October 2024 for Phase II of the Life Sciences Strategy. This commitment to advancing research, innovation, and access to life-saving medicines and treatments will improve patient outcomes and strengthen Ontario's healthcare system. It also represents a significant step forward in solidifying the province's position as a global leader in life sciences, as demonstrated through incredible partnerships with industry.

Continued dialogue between the sector, Ministry of Health, and Ministry of Economic Development, Job Creation and Trade is essential to ensuring Ontario's life sciences sector remains strong and continues to grow. Patients and the economy benefit from having companies invest in R&D and clinical trials right here in Ontario. However, a robust talent pool, a faster access system, and commitment from the government to work collaboratively with the sector are required to realize these types of investments.

- 3.1** IMC recommends that the Ontario Government establish a permanent mandate for the Life Sciences Council to ensure continued engagement with industry, post-secondary institutions, experts, and health sector stakeholders. Furthermore, IMC recommends that the Ministry of Health and Ministry of Economic Development, Job Creation and Trade recognize faster access as a key driver of investment in the life sciences sector and implement policies to improve it, such as the announced accelerated access program.





## RECOMMENDATION 4

### CONTINUE TO IMPROVE TIMELY & EQUITABLE ACCESS TO CANCER TREATMENT

Building a cancer plan that looks to the future is important for patients, the broader health system, and key stakeholders within the oncology ecosystem. IMC congratulates the government of [\*Ontario for its release of Ontario Cancer Plan 6: An Integrated Cancer System that Works for All\*](#) - specifically for its focus on advancing equity in the cancer system, improving cancer outcomes and insuring a sustainable cancer infrastructure and workforce.

- 4.1** IMC looks forward to continued engagement with the government of Ontario to address barriers to improve equitable access to effective cancer treatments, such as providing Take Home Cancer Drugs, while focusing on a streamlined approach for timely adoption of innovative medicines.





## CONCLUSION

IMC and its members look forward to building on existing collaboration and partnership with the Ontario government. IMC continues to work productively with all levels of government and stakeholders across the country to ensure the sustainability of healthcare systems and to provide Ontarians timely access to the innovative medicines and vaccines that they need.

As the province develops its budget for 2025-26, IMC urges the government to implement these recommendations and endorse policies that support investment in innovative medicines and vaccines. By doing so, Ontario can:

- Help patients avoid or delay illnesses, live longer, and enjoy a better quality of life;
- Improve efficiencies in healthcare spending and health human resources; and
- Foster a robust domestic life sciences sector, drive economic development, and create jobs.



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## FOR MORE INFORMATION

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