



INNOVATIVE
MEDICINES
CANADA

INCREASING ACCESS TO INNOVATIVE MEDICINES

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

JANUARY 2025



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INTRODUCTION

Canada's healthcare system is in crisis, and Canadian patients deserve access to healthcare innovation¹ 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%². In addition, Canadians wait two years, on average, for access to new medicines through public drug plans following Health Canada approval³.

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, invests \$2.4 billion in R&D, and contributes \$16 billion to the Canadian economy each year⁴.

Collaboration between our industry and government to create policies and regulations that help position Canada, specifically Alberta, 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 through clinical trials. This will help to ensure that Canada remains competitive with other jurisdictions within the global life sciences sector.

IMC has developed this submission in advance of Alberta's 2025 Budget, presenting a path forward that places the focus on patients in Alberta 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 Alberta and Canada.

¹ 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.

² PhRMA (2023), *Global Access to New Medicines Report*.

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

⁴ 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 ACCELERATED ACCESS PILOT PROGRAM

Alberta patients wait an average of 704 days after Health Canada's regulatory approval to gain public access to innovative medicines on public plans⁵. Without improved availability and timely access to new medicines, health and life sciences programs designed to help Albertans could be a detriment for life sciences investment, saving money, and most importantly, saving lives. If Alberta, operating in the top 4 of Canada's largest public drug plan, can contribute to reducing Canada's total time to 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 approvals for life-saving medications, as announced at the December 2024 Council of the Federation press conference.

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 like Project Orbis, this proposal 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 across the country.

- 1.1** IMC requests that the Government of Alberta follow through on this collective announcement and proceed with an accelerated access program by the end of 2025. IMC and its members remain committed to working with all levels of government, especially health ministers across the provinces, to make this vision a reality and accelerate access to innovative medicines for patients across Canada.

⁵ Health Insights: Why We Must Improve Patients' Access to Innovative Medicines in Canada:
<https://www.healthinsight.ca/managing-illnesses/managing-diabetes/why-we-must-improve-patients-access-to-innovative-medicines-in-canada/>

RECOMMENDATION 2

NATIONAL PHARMACARE BILATERAL DISCUSSIONS WITH THE FEDERAL GOVERNMENT SHOULD ADVOCATE FOR EXPANSION OF HEALTH COVERAGE & REJECT BULK PURCHASING STRATEGY

With the passing of Bill-C64, An Act Respecting Pharmacare, the province of Alberta should negotiate a bilateral agreement with the federal government that allows it to fill in the gaps and accelerate coverage to innovative medicines within its jurisdiction. 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 Alberta healthcare system. Furthermore, there would be fewer international investments in made-in-Canada innovations, thereby further reducing Canadian productivity.

- 2.1 As one of the largest provinces, Alberta plays a critical role in how the federal pharmacare bill will impact Canadians' access to innovative medicines. IMC advocates for the importance of filling the gaps in existing coverage for Albertans who do not currently qualify for private or public coverage. For Alberta specifically, the focus should be on ensuring access for those Albertans who currently do not have sufficient coverage.
- 2.2 As an additional implication of Bill C-64, the province of Alberta should reject the proposed Bulk Purchasing Strategy (currently being drafted by Canada's Drug Agency, as operationalizing private insurer access to publicly negotiated discounts will introduce further complexity and result in both delayed and reduced access to new drugs for Albertans.
 - The private insurance industry has all the necessary tools to maintain the sustainability of private drug benefits. In the last several years, insurers have invested in negotiation teams and already receive 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 Albertans with private drug plans, causing potential disease progression. Allowing private insurers access to publicly negotiated discounts will result in smaller discounts for Alberta. The discounts manufacturers can offer to the public plans are determined based on total market calculations. Including private insurers would result in smaller discounts for the public and could impede the ability to successfully conclude negotiations.

RECOMMENDATION 3

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

Continued dialogue between the sector, Ministry of Health, and Minister of Technology and Innovation is essential to ensuring Alberta'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 Alberta.

- 3.1** IMC appreciates Alberta Minister of Health Adriana LaGrange and Minister of Technology and Innovation Nate Glubish for attending and highlighting the strength of Alberta's pharmaceutical, biotechnology, and life sciences sectors at the BIO 2024 International Conference. The BIO 2024 meeting afforded an opportunity for biotechnology and pharmaceutical sector leaders, public sector representatives, and health science researchers to network and develop partnerships that will lead to greater investment in Alberta's pharmaceutical and life sciences sector.



CONCLUSION

IMC and its members look forward to building on existing collaboration and partnership with the Government of Alberta. They continue to work with all levels of government and stakeholders across the country to ensure the sustainability of healthcare systems and to provide Albertans 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, Alberta will:

- Help patients avoid 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.





FOR MORE INFORMATION

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