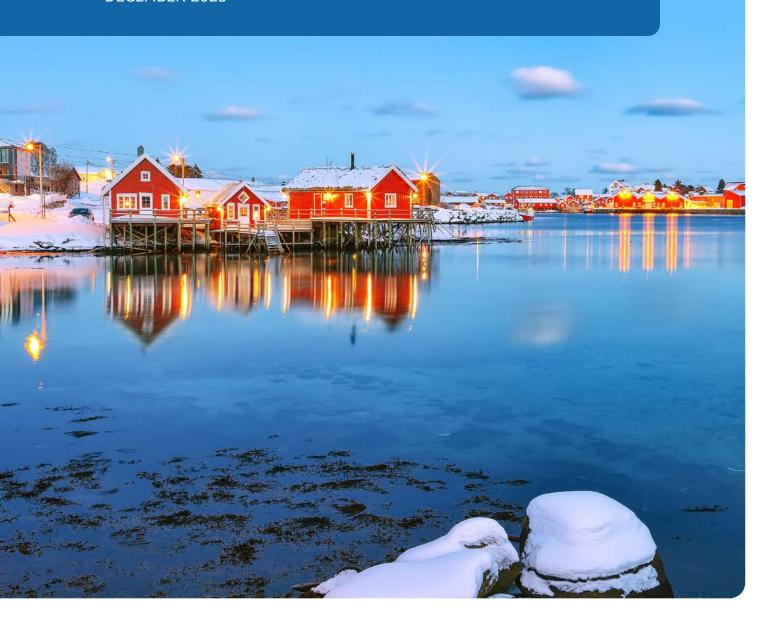


INCREASING ACCESS TO INNOVATIVE MEDICINES

Written Submission for the Pre-Budget Consultations in Advance of the 2026 Nova Scotia Budget

DECEMBER 2025





PROCEED WITH A NOVA SCOTIA-LED ACCELERATED ACCESS PROGRAM

RECOMMENDATION 2

DO NOT ENGAGE IN PHARMACARE BILATERAL DISCUSSIONS WITH THE FEDERAL GOVERNMENT AND REJECT A BULK PURCHASING STRATEGY

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INCREASING ACCESS TO INNOVATIVE MEDICINES



INTRODUCTION

Canada's healthcare system is being shaped by an increasingly complex global political landscape. In this environment, Canadian patients face growing risks to timely access to healthcare innovations¹ that deliver meaningful health outcomes. 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 in some cases they cannot access important new treatments at all. Currently, only 18 per cent of new medicines launched globally are available through Canada's public drug plans, compared with an OECD average is 28 per cent². Canadians also wait an average of two years to access new medicines through public drug plans following Health Canada approval³.

Innovative Medicines Canada (IMC) represents the country's innovative pharmaceutical companies. IMC and its members are committed to improving the health of Canadians through the discovery, development, and delivery of innovative medicines and vaccines. The sector supports over 110,000 high-value jobs, invests \$3.2 billion annually in R&D, and contributes \$18.4 billion to the Canadian economy each year⁴.

Collaboration between industry and government is more important than ever to develop policies and regulations that position Canada as an attractive destination for future R&D and life sciences investment. Canadian scientists and clinicians benefit from access to cutting-edge scientific developments, while patients get earlier access to innovative medicines through clinical trials.

Favorable policies and regulations will help to ensure that Canada remains competitive with other jurisdictions in the global life sciences sector. With recent discussions around most-favoured nation (MFN) pricing in the United States, governments must act swiftly to mitigate the potential consequences for Canada's life sciences sector and for patients.

IMC has prepared this submission in advance of Nova Scotia's 2026 budget to outline a path forward that prioritizes Nova Scotia patients and improves their access to life-saving medicines and vaccines. IMC looks forward to engaging meaningfully with government to develop solutions that benefit everyone living in Nova Scotia and across 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.



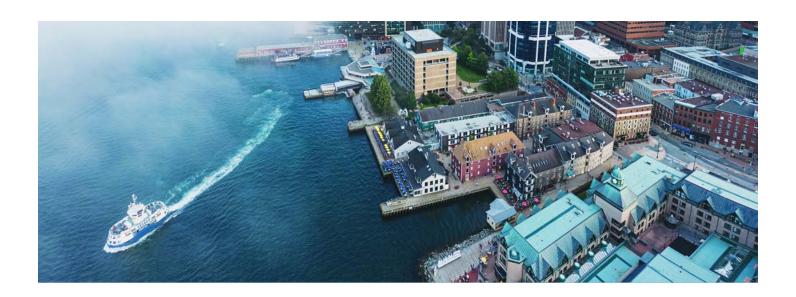
PROCEED WITH A NOVA SCOTIA-LED ACCELERATED ACCESS PROGRAM:

Canadian patients wait approximately two years after Health Canada's regulatory approval to gain access to innovative medicines through public drug plans. Without improvements in timely access to new medicines, Nova Scotia risks falling behind in delivering optimal health outcomes, improving population health, and creating an attractive ecosystem for life sciences investment. By reducing the time it takes for medicines to reach patients, Nova Scotia can strengthen its competitiveness as a destination for research investment, clinical trials, and biomanufacturing.

IMC welcomes the collective agreement among Canada's premiers to take meaningful action to accelerate provincial listings of life-saving medicines, as announced by Premier Doug Ford at the December 2024 Council of the Federation press conference in Toronto.

IMC also recognizes that collaboration is essential to achieving these goals and supports Premier Houston's call for all stakeholders, including drug manufacturers, to work together to deliver this initiative. Ensuring that patients can benefit from Health Canada-approved treatments through a newly created accelerated access framework represents a critical step toward closing access gaps that can arise immediately following a positive recommendation by Canada's Drug Agency. This approach will improve health outcomes not only for Nova Scotians but for patients across Canada.

1.1 IMC requests that the Government of Nova Scotia announce an accelerated access framework by the end of Q1 2026. IMC and its members remain committed to working with all levels of government, particularly health ministers and drug plan managers across the provinces, to make this vision a reality and to accelerate access to innovative medicines for Nova Scotians.





DO NOT ENGAGE IN PHARMACARE BILATERAL DISCUSSIONS WITH THE FEDERAL GOVERNMENT AND REJECT A 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 Nova Scotia healthcare system. Furthermore, there would be fewer international investments in made-in-Canada innovations, thereby further reducing Canadian productivity.

- **2.1** Every province plays a critical role in determining how the federal pharmacare bill will affect Canadians' access to innovative medicines. Given the current federal political climate, IMC recommends that the Government of Nova Scotia not enter into bilateral pharmacare negotiations.
 - If bilateral negotiations do proceed, IMC emphasizes the importance of filling the gaps in existing coverage for Nova Scotians who do not currently qualify for either private or public coverage.
- **2.2** As another implication of Bill C-64, Nova Scotia should reject a bulk purchasing strategy. Allowing private insurers to access publicly negotiated discounts would introduce additional complexity and could reduce access to new medicines for Nova Scotians.
 - The private insurance industry already has the tools necessary to maintain the sustainability of employer-sponsored drug benefits. Insurers have invested in specialized negotiation teams and receive direct discounts from manufacturers to meet the needs of their clients. As a result, private drug plans typically deliver access to medicines in nearly half the time compared to public plans.
 - Requiring private plans to wait for public plan listings and negotiations would delay access for Nova Scotians covered through employer-sponsored plans. In addition, allowing private insurers access to publicly negotiated discounts would likely reduce the size of those discounts for Nova Scotia, as manufacturer pricing for public plans is based on total market calculations that currently include higher-priced sales through private insurers.



CONTINUE TO STRENGTHEN AND PRIORITIZE NOVA SCOTIA'S LIFE SCIENCES SECTOR AS A KEY DRIVER OF HEALTH AND ECONOMIC DEVELOPMENT:

IMC commends the Government of Nova Scotia for its continued support of the provincial life sciences sector. Life Sciences NS and the Nova Scotia Innovation Hub are leading the way in Canada on several key initiatives. This sustained commitment to advancing research, innovation, and access to life-saving medicines will continue to improve patient outcomes and strengthen Nova Scotia's healthcare system. It also reinforces the province's position as a global leader in life sciences, demonstrated through strong and productive partnerships with industry.

Ongoing dialogue between industry, the Premier's office, the Department of Health and Wellness, and the Department of Growth and Development is essential to ensuring Nova Scotia's life sciences sector remains competitive and continues to grow. Patients and the broader economy benefit when companies invest in R&D and conduct clinical trials in the province. To attract and sustain these investments, Nova Scotia needs a robust talent pool, faster and more predictable access pathways, and continued collaboration between government and the sector.

3.1 IMC recommends that the Department of Health and Wellness and Department of Growth and Development recognize faster access as a key driver of investment in the life sciences sector. IMC further recommends implementating policies that support this approach, including the creation of an accelerated access program.





MITIGATE THE IMPACTS OF MOST-FAVOURED NATION POLICY:

In May 2025, the United States issued an Executive Order introducing a most-favoured nation (MFN) pricing policy, which links U.S. pharmaceutical prices to the lowest prices paid in other countries. As a result, international scrutiny of pharmaceutical pricing has intensified, creating uncertainty for new product launches, as well as innovation and investment in Canada. The policy also places significant pressure on Canada to contribute more to the cost of innovation. For provinces, including Nova Scotia, it highlights the importance of mitigating potential risks to patient access, innovation, and competitiveness.

- **4.1** IMC requests the Government of Nova Scotia's collaboration with its federal counterparts to help mitigate the potential downstream impacts of MFN-related policies and other international pricing pressures by:
 - Bolstering resourcing for health and innovation through faster and more predictable access to medicines;
 - Promoting regulatory agility, including by addressing challenges with the Patented Medicine Prices Review Board (PMPRB);
 - Advocating at the federal government level for policies and funding that support innovation and improve access to medicines.





CONCLUSION

IMC and its members look forward to strengthening their existing collaboration and partnership with the Government of Nova Scotia. IMC continues to work productively with all levels of government and stakeholders across Canada to support sustainable healthcare systems and ensure Nova Scotians have timely access to the innovative medicines and vaccines they need.

As the province develops its budget, IMC encourages the government to implement these recommendations and advance policies that promote investment in innovation and improve patient access to medicines. By doing so, Nova Scotia can:

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

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 the country. 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.





FOR MORE INFORMATION

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