

Date November 30, 2022

Hon. Jean-Yves Duclos
Minister of Health
House of Commons
Ottawa, ON K1A 0A6

Dear Minister:

On behalf of Canadian patients and families who are deeply concerned by the proposed changes to the Patented Medicines Pricing Review Board (PMPRB) guidelines that, when they go into effect on January 1, 2023, will obscure the way that the price of new medicines is regulated in Canada, we are writing to urge the government to pause the implementation until more consultation and an assessment of impact of these changes on access to medicines can be done.

The Protect Our Access coalition, comprised of fifteen patient organizations representing Canadians affected by a life-limiting or life-threatening health condition, many of whose lives rely on the hope of timely and equitable access to new medicines, supports efforts to lower the cost of prescription drugs for Canadians. We expect pharmaceutical manufacturers to bring their products to market at a responsible price, but we also expect the government to ensure that the regulatory environment in Canada does not impede timely and equitable access to medications that can improve the health of Canadians.

As written, these guidelines raise several concerns for us and the patients we represent:

1. The tight timeframe for consultations on the guidelines and the plan to implement on January 1 the changes when feedback will only have been received on December 5 creates the impression that the current consultations are not sincere. **Guidelines must be developed in full consultation with patients and their representatives.**
2. The guidelines as written do speak only to price, not to the value or cost/benefit ratio of a medication. To consider only price is to reflect on only part of the picture. **Guidelines must put value to patients first – not cost.**
3. Too often in the guidelines as drafted, decision-making powers are granted to PMPRB staff without clearly and transparently stated criteria. This leaves a significant number of decisions open to the “opinion of PMPRB staff” and thereby grants them powers that are not clearly outlined or limited. Recent Court decisions in multiple jurisdictions in Canada have limited the powers of the PMPRB. **Guidelines must be clear and explicit about criteria and powers of PMPRB.**

4. The government does not appear to have conducted any assessment of the impact on how quickly and readily new medications will be accessible by Canadian patients following the implementation of these changes to guidelines. **Efforts at reducing costs of medicines in Canada should not slow down patient access to potentially life-saving medications.**

We therefore ask you, Minister, to please:

1. **Pause implementation** of the proposed changes to PMPRB guidelines
2. Undertake **open and sincere consultations** with patients and patient organizations impacted by these changes
3. Conduct an **assessment of the impact** that these changes will have on patient access to new medicines in Canada

We attach for your reference a position paper we developed earlier this year articulating our perspective on the principles of a patient-first system, to which we should all aspire.

Thank you for your consideration.

Sincerely,



Peter Glazier
Executive Vice President
Lung Health Foundation

On behalf of:

[ALS Society of Canada](#)
[Canadian Hospice Palliative Care Association](#)
[Canadian Association of PNH Patients](#)
[Coalition Priorité Cancer au Québec](#)
[Colorectal Cancer Canada](#)
[Cystic Fibrosis Canada](#)
[Fighting Blindness Canada](#)
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[Ovarian Cancer Canada](#)
[PROCURE – The Force Against Prostate Cancer](#)
[The Leukemia & Lymphoma Society of Canada](#)

Cc: Adam Van Koeverden, Parliamentary Secretary for Health
Dr. Stephen Ellis, Shadow Minister for Health, CPC
Don Davies, Critic for Health, NDP
Luc Theriault, Critic for Health, BQ
Elizabeth May, Leader of the Green Party
Senator Gigi Osler
Senator Ratna Omidvar
Senator Jane Cordy
Senator Rosemary Moodie