

Written Submission for the
Pre-Budget Consultations in
Advance of the Upcoming
Federal Budget

By: GlaxoSmithKline Inc.



Recommendations:

1) The government should update and refresh the National Immunization Strategy, last updated in 2003, by consulting with physicians, industry, patient groups, patients, caregivers and other health system stakeholders.

2) The government should allocate dedicated federal funding to ensure a revitalized National Immunization Strategy that delivers expanded and equitable access to Canadians for all recommended adult vaccines, regardless of where they live in the country.



Executive Summary

With the acceleration towards the development of a COVID-19 vaccine captivating the world and driving home the incredible importance of immunization – particularly for older adults – Canada has a unique opportunity to leverage this momentum and build a pan-Canadian immunization system that is the envy of the world.

To accomplish this goal, GSK asks for the Government of Canada to consider the two recommendations outlined above.

Taken together, the two actions of refreshing the National Immunization Strategy and allocating dedicated federal funding will help strengthen the pan-Canadian immunization system, bring more transformative products to more Canadians, and recognize the value of innovation that can be delivered by the Government of Canada to its citizens.

Immunization is a Cornerstone of Canada's Healthcare System

As one of the world's leading vaccine manufacturers, GSK has a deep understanding of the power and potential of immunization. Everyday, we deliver over 2M doses of vaccine to people living in over 160 countries. We have a current portfolio of over 30 vaccines, and an innovative pipeline of over a dozen new candidate vaccines we're working diligently to bring to market. GSK's vaccines are made in 12 manufacturing sites located around the world, including our state-of-the art vaccine production facility in Ste-Foy, Quebec.

In our effort to help combat the coronavirus, GSK is not only leveraging our in-house R&D capabilities but also forging multiple new external partnerships. For example, GSK is partnering with Sanofi¹ to develop an adjuvanted vaccine for COVID-19 using innovative technology from both companies; we are also actively participating in the COVID-19 Therapeutics Accelerator² – a collaborative effort to research, develop and bring effective treatments to market quickly and accessibly; and finally, in July GSK announced an important new collaboration with the Quebec-based biopharmaceutical company Medicago to develop and evaluate a COVID-19 candidate vaccine.³



One hundred years ago, infectious diseases were the leading cause of death worldwide. In Canada, they now cause less than 5% of all deaths —thanks to immunization programs. Immunization has probably saved more lives in Canada in the last 50 years than any other health intervention.¹

¹ <https://ca.gsk.com/en-ca/media/press-releases/2020/sanofi-and-gsk-to-join-forces-in-unprecedented-vaccine-collaboration-to-fight-covid-19/>

² <https://www.therapeuticsaccelerator.org>

³ <https://www.gsk.com/en-gb/media/resource-centre/our-contribution-to-the-fight-against-2019-ncov/>

¹ https://www.cpha.ca/sites/default/files/assets/history/cpha100-poster_e.pdf

From this foundation of knowledge and commitment, GSK applauds the Government of Canada for its efforts to ensure that at least two doses of a future vaccine will be available to every Canadian.¹ For us, this commitment by the

Government of Canada drives home two interdependent points: First, that delivering future coronavirus vaccines to Canadians across the country will require the collective efforts of a broad range of public and private sector partners. Second, that Canada can extend the preparations currently being made at the national level to discover and distribute a COVID-19 vaccine and apply them to the even bigger and more essential task of building a truly pan-Canadian immunization system.

To accomplish this fundamental goal, we urge the Government of Canada to take **two key steps:**

1. Redesign and relaunch the National Immunization Strategy – initially launched in 2003 – by launching a broad and inclusive stakeholder engagement consultation; and,
2. Allocate dedicated federal funding to ensure a revitalized National Immunization Strategy delivers expanded and equitable access to all recommended adult vaccines to all Canadians, regardless of where they live.

Taken together, these two actions will help strengthen the pan-Canadian immunization system, bring more transformative products to more Canadians, and recognize the value of innovation that can be delivered by the Government of Canada to its citizens.

It's Time for an Updated National Immunization Strategy.

The emergence and impact of COVID-19 has shown what the world can look like when just a single vaccine is missing. Although the coronavirus has highlighted the importance of developing innovative new vaccines for unanticipated diseases, adult Canadians would also considerably benefit from expanded access to numerous vaccines already available in this country, including vaccines to prevent influenza, viral pneumonia and shingles. Every year, these infectious diseases and health afflictions have an enormous impact on individual Canadians, provincial healthcare systems and the national economy.²

¹ [cbc.ca/news/politics/feds-preparing-for-covid-vaccine-1.5654801](https://www.cbc.ca/news/politics/feds-preparing-for-covid-vaccine-1.5654801)

² https://ipaccanada.org/photos/custom/Members/pdf/CD_Howe_Commentary_Not%20Just%20for%20Kids_How_to_Improve_Adult%20Vaccination_in_Canada.pdf

With the objectives of Canada’s current National Immunization Strategy due to expire in 2021¹, the Federal government has an ideal opportunity to work with its partners to design and deliver a more resilient, future-focused immunization system to address not only the coronavirus but also other viruses for which pose as an increased risk to seniors and older adults.

An update to the National Immunization Strategy could also help accelerate the adoption of the coming generation of therapeutic vaccines which will revolutionize not just the prevention but also the care and treatment of a growing range of complex, chronic diseases that one day soon may even include cancer. The coronavirus pandemic has exposed how those who suffer from chronic diseases, including heart disease, lung disease, obesity and type 2 diabetes, are at even greater risk than their healthier peers. GSK looks forward to the day when this coming generation of vaccines becomes an essential part of the toolbox for health care providers caring for these complex, vulnerable patients.

Unfortunately, we still have some distance to travel as a country before we can realize this objective. Today, with provinces and territories adopting individualized approaches to immunization, Canadians experience a “patch-work quilt” of vaccine access. Although vaccine coverage is largely standardized for children in Canada, too many adults



lack equitable access to certain vaccines for diseases like shingles. That’s why GSK is strongly urging the Government of Canada to take the lead in developing a harmonized pan-Canadian strategy for enhanced access to all recommended adult vaccines.

¹ <https://www.canada.ca/en/public-health/services/publications/healthy-living/national-immunization-strategy-objectives-2016-2021.html>

GSK believes that a redesigned and relaunched Canadian strategy should include a core set of complementary strategic pillars, including:

1. Developing Targeted Strategies to Close Immunization

Coverage Gaps. An updated and enhanced pan-Canadian strategy has to support improved more equitable access to immunization across all patient demographics. Although Canada can be commended for the effectiveness of its pediatric vaccine programs, adult immunization continues to lag, and many cohorts of adults, in particular seniors, are woefully under-vaccinated.

2. Strengthening NACI to Bring Vaccines to Patients Faster and More Efficiently.

Canada's National Advisory Committee on Immunization (NACI) does vital work in evaluating vaccines for the Canadian market. Unfortunately, due to insufficient resources, the current review period for new vaccines – as well as new scientific and economic data for existing vaccines – can take up to several years. Through increased funding and leveraging insights from across pharmaceutical review systems in Canada and beyond, a stronger and better-resourced NACI will help Canadians receive accelerated access to life-changing vaccines.

3. Leveraging Technology and Social Media to Highlight the Value of Vaccines.

Unfortunately, too many Canadians are still swayed by myths and misinformation relating to the science behind vaccines and their ensuing safety and efficacy. A revitalized strategy should include a dedicated focus on crafting simple, powerful messages that target lay audiences with authoritative storytelling delivered through innovative channels.

4. Expanding and Improving Disease Surveillance Systems. Building a comprehensive immunization strategy for Canadians involves better understanding the burden of disease.

A more robust and timely surveillance system would enable us to understand where to target disease prevention more effectively, leading to improved evaluation, better metrics and more precise public health initiatives. As an incredible resource of information for those developing the next generation of vaccines, a strengthened surveillance system for disease would also help attract both new research and new products into Canada.

Provided it was accompanied by increased and dedicated pan-Canadian funding, a strategy defined by the pillars outlined above would provide Canada with an unparalleled foundation for immunization and population health by maximizing the value of vaccines.

An Updated Strategy Requires Dedicated Funding

Today, more than 25 infectious diseases are preventable with vaccines – an incredibly cost-effective intervention compared to the ongoing costs of treating disease.¹ As the Government of Canada itself argues, *“Today, not enough Canadians are vaccinated. As a result, Canadians are still at risk for needless illness and death from infectious diseases that could be prevented through vaccination.”*²

As outlined above, a redesigned and relaunched National Immunization Strategy would have a sustained and significant impact on public health across Canada. GSK believes that each of the strategic pillars outlined on the previous page will require new thinking, new partnerships, and new investment to maximize the value of vaccines.

More specifically, we recommend that the Government of Canada initially target its investment in two directions:

1. Health Canada should invest the resources required to support NACI’s efforts to create a faster and more efficient review process for vaccines to expedite access for Canadians across the country.

1 <http://www.biotech.ca/policy-matters/health/canadas-vaccine-industry-committee/vaccines-in-canada/>

2 <https://www.canada.ca/en/public-health/services/immunization-vaccine-priorities/immunization-partnership-fund.html>

2. The federal government should increase funding to provinces and territories across Canada to expand public access to recommended vaccines that millions of Canadians still lack access to (for example, shingles).

Although the Federal Government committed \$25M million in Budget 2016 to increase vaccination coverage across the country, that investment is now more than four years old and well below the amount required to ensure Canadians across the country receive the preventative care they both need and deserve. **For this reason, we believe that a revitalized and refreshed National Immunization Strategy must be accompanied by expanded, dedicated pan-Canadian funding.** This approach would build on the important precedent established in 2007, when federal funding helped expand access to the HPV vaccine in smaller provinces across the country on the basis of equity for all Canadians.

Canadians Deserve a World-Class Immunization System

Updating the National Immunization Strategy and underpinning it with dedicated, annualized funding are two essential steps the Government of Canada can take to fundamentally strengthen the country's immunization environment. However, bringing innovative new vaccines to Canadians will still be a struggle without the existence of a pricing and access environment for these transformative products that makes Canada competitive with its OECD peers.

Unfortunately, at a time when the importance of access to medicines has arguably never been clearer, there is emerging evidence that fewer innovative medicines are coming to Canada.



An analysis of new drug launches in Canada conducted by IQVIA – one of the world’s leading healthcare data companies – found that in 2019, there was a 40% drop in the number of new drugs launched in Canada despite the overall number of global launches rising during the year. Canada also received less than half of the total number of new therapies launched globally in 2018.¹ Should proposed reforms to the Patented Medicine Prices Review Board go forward without significant changes, Canada’s attractiveness as a market for innovative new vaccines and medicines will be further damaged. Against this challenging backdrop, GSK is open to working with the Federal, Provincial and Territorial governments to advance pricing and reimbursement policies that will curb these concerning trends, not worsen them.

With the accelerating search for a vaccine to help prevent COVID-19 focusing our efforts and driving home the vital importance of immunization, Canada has a unique opportunity to leverage this momentum, and build a pan-Canadian immunization system for adults that recognizes the value of these innovations and is the envy of the world.

GSK is a science-led global healthcare company that researches, develops and manufactures innovative pharmaceutical medicines, vaccines, and consumer healthcare products. Our operations in Canada employ over 2,500 full-time staff, with a large manufacturing plant in Quebec, and we are proud to have been named one of Canada’s 2020 Top 100 Employers.²

1 <https://lifesciencesontario.ca/news/canada-may-be-losing-its-status-as-a-top-global-destination-for-new-medicine-launches/>

2 <https://ca.gsk.com/en-ca/media/press-releases/2019/gsk-named-one-of-canada-s-top-100-employers/#:~:text=A%20science%2Dled%20global%20healthcare%20company%20that%20researches%2C%20develops%20and,over%202%2C000%20full%2Dtime%20staff.>