

November 2, 2020

PMPRB PUBLIC CONSULTATION SUBMISSION

Women's Health Coalition of Alberta Society

The Women's Health Coalition of Alberta Society (WHC) is committed to creating a movement that empowers people to speak openly, learn and engage with purpose to address barriers, gaps, and policies that impact women's menstrual, reproductive, and sexual health.

The WHC has reservations about the proposed changes being introduced by the Patented Medicines Prices Review Board (PMPRB).

The WHC is highly committed to ensuring that women have access to the right treatment and support at the right time. The PMPRB's changes create three areas of concern, each having the potential to create a gap or barrier for women's health and for all Canadians.

- **Access to medicines:** Canadians deserve access to innovative medicines that are available in other countries. There is an increasing disparity between Canada's review of new therapies, as compared to other countries. Proposed changes to PMPRB will expand this gap even further.
- **Patient participation in clinical trials:** Pharmaceutical research and patient participation in Canadian research and development (clinical trials) is important to constituents and the health system. Canadians will be left out of advanced options and compassionate access programs if approval and pricing policies discourage investment in Canadian-based research and development.
- **Timely approvals:** Timely approval for innovative therapies and new indications improves health outcomes. Drugs approved by Health Canada are already experiencing delayed release and any additional requirements of PMPRB could increase delays further.

THE RESEARCH

Recent publications and reports support our concerns:

1. Canada experienced a global share of industry-funded clinical trials of just 9% following the introduction of the latest round of regulations, compared to 10% in the three years prior
2. Canada has experienced a significant decline (30% - 40%) in the number of newer drugs submitted within the 12 months following the drug's submission elsewhere
3. A comparison to the last three years shows that twice as many drugs with Health Canada approval were delaying launch in Canada by more than 6 months
4. In 2019, Canada saw a significant decline in the number of new drug launches, potentially as a result of PMPRB's regulations

OUR REQUEST

The distinct roles of Health Canada, CDR, pCODR, and CADTH should be preserved, ensuring they continue protecting the health outcomes and interests of Canadians. PMPRB has proven successful in its current mandate by ensuring that drug pricing is not excessive. This role has been fulfilled well since Canada's per-capita spending on patented medicines has remained unchanged over the last ten years. In addition, it is important that the role of the pCPA, as a provincial collaborative, retains its leadership and authority over negotiating final drug pricing across Canada.

The WHC asks that PMPRB's new guidelines not be approved, or be modified to preserve Canadians' access to new therapies and clinical trials.

We welcome the opportunity to address this matter with you in greater detail. Should you wish to speak with us, please e-mail us at info@theWHC.ca.

THE WOMEN'S HEALTH COALITION OF ALBERTA SOCIETY

The Women's Health Coalition of Alberta Society (WHC) is committed to creating a movement that empowers people to speak openly, learn and engage with purpose to address barriers, gaps, and policies that impact women's menstrual, reproductive, and sexual health. The WHC is raising awareness, conducting research and advocating to address gender bias in health delivery. We are a network of women who have faced health challenges, people who care about, and for women, health care professionals, and business leaders motivated to improving women's health.

Chair/President, Carmen Wyton

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