

February 28, 2023

Open Letter to:
The Honourable Jean-Yves Duclos, P.C., M.P.
Minister of Health
Government of Canada
House of Commons
Ottawa, ON K1A 0A6
via Jean-Yves.Duclos@parl.gc.ca

Dear Minister Duclos,

I am writing to you today about recent comments in the media¹ concerning your Patented Medicine Prices Review Board (PMPRB) decisions. **I think you made the correct decisions**, and I believe that this reporter, and others who followed, are cherry picking information to dazzle Canadians with her point of view. Regrettably, these views lack context, experience, and true knowledge of the situation.

To establish my specific role in this process, I was one of the three patient representatives on the PMPRB Steering Committee on Modernization of Price Review Process Guidelines 2018-2019.² Sadly, patient representatives were nothing more than a checkmark to the PMPRB. In fact, the Executive Director, who has now resigned, was disrespectful to the patient community through the entire process. I am not sad to see him go and trust you will be able to fill his shoes with a more respectful individual who actually listens to the patient community.

As you know, Canada is the only country in the world with a regulator that caps patented medicine prices. PMPRB is a quasi-judicial body, in operation since 1987 that compares new and old drug prices in Canada with those in other countries, to determine the maximum prices for sale here.

Since 2017, the PMPRB has tried to change the rules, move the goalposts, and create unnecessary havoc for the population. There were only three patient representatives on a committee that was supposedly in place to “steer” the direction of how new rules would operate. We didn’t end up steering anything. This bus had one driver with a pre-set agenda, and none of our input was considered. This was emblematic of the “we’ll tell you what we’re going to do” style of PMPRB consultations. The PMPRB fed the reporter biased perspectives from the beginning.

Our registered charity has helped patients understand the PMPRB with a series of articles and videos on our website to encourage discussion <https://badgut.org/pmprb-impact-report/>.

To be clear, I have always supported the proposed changes to the basket of comparator countries and wanted the amendments to stop there. Yet, the PMPRB keeps spending money coming up with new schemes, while ignoring the whole object of the exercise – the only reason we need medication in Canada is to serve our patient population.

Importantly, the PMPRB is not the only body that reduces drug prices, as all federal, provincial, and territorial governments and private insurers have other processes in place that further push the price of a medicine lower, particularly through negotiations. **These can result in medications not getting to the person who needs them.** The pan-Canadian Pharmaceutical Alliance (pCPA) has just incorporated as a non-profit organization to negotiate prices more officially with the jurisdictions. How many layers of price negotiation do we need? The PMPRB also wanted to include health technology assessment to its price reviews when the Canadian Agency for Drugs and Technologies in Health (CADTH) already does this.

During the pandemic and looking toward a post-pandemic world, we can’t rely on the status quo. We’ve all heard of rising concerns accessing everyday items due to manufacturing delays, discontinued products, and supply chain issues related to diminished raw materials, electronic component shortages, and increasing labour costs. Medications are among these products.

So why, in this extraordinarily complex world-wide context, would the PMPRB focus on further lowering the regulated prices of prescription medications when access to these lifesaving and life-improving products is already at risk? In an already strained and over-suppressed pricing environment, further reductions will lead to less service for patients at the pharmacy, and delays in certain product delivery.

Clearly, you made the right decision in November. Every person in Canada who lives with acute and chronic illnesses **relies on you** to halt any more PMPRB reforms and to refrain from making changes that hurt Canadians who need help now more than ever before.

Again, I thank you for postponing the PMPRB reforms and trust you will re-direct them to actually think about patients who need the medications that they are playing with. There will be human costs if PMPRB gets to make its changes. **I trust you will offer meaningful engagement with the end users of medications because we matter and need to be heard.**

Thank you for putting patients' needs first. This is what the Minister of Health should be doing. **You made the right decision.**

Wishing you the best in all your future decisions.

Yours sincerely,



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¹ Crowe, K. After pharma lobbying, minister intervened to suspend drug-price reform. The Breach February 22, 2023
Available at: <https://breachmedia.ca/after-pharma-lobbying-minister-intervened-to-suspend-drug-price-reform/>

² Patented Medicine Prices Review Board (PMPRB) Terms of Reference for Steering Committee on Modernization of Price Review Process Guidelines *Government of Canada* Available at: <http://www.pmprb-cepmb.gc.ca/view.asp?ccid=1377&lang=en>