

From: Srisombun, Anchalee (MOHLTC) [<mailto:Anchalee.Srisombun@ontario.ca>]
Sent: January-15-16 4:13 PM
To: Guillaume Couillard
Subject: pCPA Feedback on PMPRB's Incremental Guidelines Change

Dear Guillaume,

Participating pCPA jurisdictions have reviewed the presentation slides and support PMPRB's proposed changes, specifically as it relates to Initiative # 2.

"2. Review of Prices of New Patented Drug Products at Introduction (Section C.11)
Require patentees to ensure that domestic list prices for new drugs are below price ceilings. For new drugs, Board Staff will compare the publicly available ex-factory price of the six sources identified in the Guidelines (AQPP, IMS Health, McKesson, ODB, PPS Pharma, RAMQ) and require patentees to ensure that they are below the MAPP."

As the pCPA understands, PMPRB establishes the ceiling price (MAPP) and currently use national average transaction prices (total net revenues across all markets divided by total number of units across all markets) to determine if patentees are not excessive. The proposed changes would see PMPRB start looking at list prices to see that they are not above the ceiling. This could potentially decrease the list prices, allowing private and cash payers to benefit as well, which complements pCPA's aim to achieve lower drug costs and consistent pricing.

Kind regards,

Anchalee Srisombun

Senior Negotiator / Négociateur Principal
pan-Canadian Pharmaceutical Alliance Office
Bureau de l'Alliance pancanadienne pharmaceutique
416-326-3506 (O)
647-981-6659 (M)