



Canadian Breast Cancer Network
Réseau canadien du cancer du sein

Patented Medicine Prices Review Board
(Rethinking the Guidelines)
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Ottawa, Ontario K1P 1C1

The Canadian Breast Cancer Network (CBCN) is a leading, national, patient directed organization committed to ensuring the best quality of care for all Canadians affected by breast cancer. CBCN strives to champion the patient voice through the promotion of education/information sharing, networking and advocacy initiatives. We would like to share our key considerations in response to the Patented Medicine Prices Review Board consultation on the Guidelines Modernization Discussion Paper:

International price comparisons: International price referencing by PMPRB should include countries with similar health expenditure as Canada, as well as similar markets, disease burdens and health systems. Price alone, should not be the only factor that PMPRB explores to determine which basket of countries we will use as a standard of comparison for therapies in Canada.

Duplication between HTA bodies: The role of PMPRB in contrast with other pricing review bodies, such as the Pan-Canadian Pharmaceutical Alliance, must be examined further. Given that many industry players are directly negotiating off list prices with these entities, the role of PMPRB in establishing pricing ceilings remains unclear. Further clarification and communication is needed to clarify the impact and role that PMPRB will play in increasing the affordability of medications for Canadian patients.

Ensuring access: It is critical that the modernization of PMPRB's guidelines does not create a disincentive for industry to bring new treatments to the Canadian market. While the affordability of new medications is certainly paramount, the ability of patients to be able to access effective therapies that are available in other countries and jurisdictions must also be protected. The Canadian market is quite small in comparison to the global market for therapies. Further information is needed to ensure that the pricing of medications in Canada is fairly balanced, and continues to prioritize innovation so as to ensure continued access to new and effective therapies for Canadian patients.

We look forward to continuing the dialogue on pricing of medications in Canada and participating in the future consultation process.

Thank you,

A handwritten signature in cursive script that reads 'Niya Chari'.

Niya Chari
Director of Government Relations,
Canadian Breast Cancer Network