

October 31, 2016

Patented Medicine Prices Review Board Box L40, 333 Laurier Avenue West, Suite 1400 Ottawa, Ontario K1P 1C1

E-mail: PMPRB.Consultations.CEPMB@pmprb-cepmb.gc.ca

Thanks you for the opportunity to provide input into the PMPRB public consultation on modernizing the *Compendium of Policies, Guidelines and Procedures* (Guidelines).

The Canadian Diabetes Association (CDA) is a registered charity that helps the 11 million Canadians living with diabetes or prediabetes. We lead the fight against diabetes by helping those affected by diabetes to live healthy lives, preventing the onset and consequences of diabetes, and discovering a cure. Dr. Charles Best, co-discoverer of insulin, helped create the Diabetes Association of Ontario in the 1940s—which became the CDA in 1953.

Currently the diabetes epidemic is costing our publicly funded health-care system billions of dollars every year, in hospitalizations due to diabetes complications, physician and specialist visits, and in-patient drug costs. The cost will keep growing along with the rising prevalence, projected at 40% over the next 10 years. And yet, at least 1 in 4 Canadians with diabetes faces difficulty paying for prescribed medications and supplies and is forced to choose between needed medications and necessities in life such as food and rent. The CDA has estimated that a person with diabetes may need to spend up to \$6,000 for needed medications, supplies and devices, which can severely compromise diabetes management if a person does not have the means to pay. This puts them at high risk of being hospitalized for serious and costly complications.

To this end, the CDA has been advocating for affordable, timely and equitable access to prescribed medications, devices, supplies, high quality care, education, healthy foods and all other supports for all Canadians with diabetes to effectively manage their disease, regardless of their income and where they live. We believe having access to needed care and supports is a fundamental right for all people with diabetes; no Canadian with diabetes should have to skip medications or stretch supplies because they cannot afford to live well with diabetes. This vision is shared by other fellow members of the Health Care Coalition of Canada (HCCC), which includes 30 health charities. CDA also reinforces HCCC's recommendation for PMPRB to meaningfully engage patient representatives in decision making around drug pricing. As PMPRB looks to revise its Guidelines, any revisions to the Guidelines following the consultation process must prioritize the needs of patients and the sustainability of the health-care system. We commend your attention to the submission by HCCC.



As regulator of patent drug pricing in Canada, the PMPRB has a unique mandate to balance the interest of payers and patent holders of medicines, while ensuring patients can afford needed medications to live healthy lives. We look forward to continuing to support PMPRB in fulfilling this mandate and participating in the next phase of the public consultation. Please feel free to contact us with any comments or further questions about our position on these matters.

Sincerely,

Seema Nagpal, B.Sc. Pharm., M.Sc., Ph.D. Director of Public Policy, Epidemiologist

Canadian Diabetes Association

Seera Regal

45 Montreal Road Ottawa, ON, K1L 6E8

E-mail: Seema.Nagpal@diabetes.ca

T: 613-688-5938 F: 613-688-5948