March 3, 2008

Sylvie Dupont,
Secretary of the Board
Patented Medicine Prices Review Board
Box L40, Standard Life Centre
333 Laurier Avenue West, Suite 1400
Ottawa, ON, K1P 1C1

Dear Ms Dupont:

On behalf of the Best Medicines Coalition (BMC), thank you for the opportunity to comment on the recent Discussion Paper entitle: Options for Possible Changes to the *Patented Medicines Regulations*, 1994 and the Excessive Price Guidelines.

As you may be aware, the BMC is a national alliance of organizations and individuals, representing those living with or affected by chronic disease or illness. With a core mandate of ensuring access to the best evidence-based medicines for Canadians, BMC's patient representatives are actively involved in discussions about drug review reform, patient safety, and general health policy development. Members our Operations Committee have provided extensive feedback into the Excessive Price Guidelines during the cross country workshops in 2006 and have been members of two of the PMPRB working groups that came out of those workshops.

Issues around price guideline regulations are a key concern for the BMC, particularly how such regulations may impact treatment accessibility for patients. In broad terms, the BMC believes that any regulatory change must be assessed by policy decision makers in terms of whether it will broaden or limit access to new treatments. Therefore, the goal of reforms must be to find a balance between fair and equitable prices and a regulatory framework that does not dissuade existing manufacturers or new manufacturers from bringing new treatments to Canada.

Continued access to compassionate drug supply is vital to many Canadian patients. Therefore, the BMC requests that any regulatory reforms be carefully assessed to ensure that they will not lead to a discontinuation or decrease in compassionate programs. Likewise, patient support programs, administered or funded by manufacturers, offer significant value to patients. Therefore, efforts should be made to ensure that the regulatory environment encourages continuation of these programs.

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In addition, in many situations free samples offered by physicians are sometimes the only way for patients to gain access therefore, again, the regulatory environment must not discourage manufacturers from this practice.

Thank you for the opportunities to provide our input and for your careful consideration moving forward. We encourage you to continue to seek input from patient groups and to explore ways to broaden that input. This would involve making contact with greater numbers of patient groups and communicating in straightforward, non-technical language that can be understood by all Canadians, thus engaging patients in these important policy discussions.

We look forward to regular updates and additional opportunities to provide input as you move forward with this important work.

Sincerely,

Linda Wilhelm,
Vice Chair, BMC

cc: Louise Binder, Chair, BMC
Lynn MacDonald, Operations Committee, BMC
Denis Morrice, Operations Committee, BMC
Paulette Eddy, Executive Director, BMC