

via email to sdupont@pmprb-cepmb.gc.ca

February 26, 2008

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

Dear Ms. Dupont:

RE: Response to PMPRB's January 31st Discussion Paper

Biogen Idec encourages PMPRB to carefully review the proposals suggested by BIOTECanada (attached) in their response to the Discussion Paper released by PMPRB on January 31st, 2008 ("Options for Possible Changes to the *Patented Medicines Regulations, 1994* and the Excessive Price Guidelines").

The options presented in PMPRB's Discussion Paper are complex and, more importantly, are inter-related in complex ways. Any changes to the *Regulations* and/or Guidelines that compromise the ability of innovative biotechnology companies to offer patient-based programs which benefit Canadians, now or in the future, should not be made without a fully considering the impact of such changes. We note, in particular, that PMPRB currently has two Working Groups actively engaged on issues that could significantly impact on manufacturers, payers and patients. At a minimum, we recommend that discussions regarding possible changes to the *Regulations* and/or Guidelines should be postponed until these Working Groups provide their final reports to the Board later this year.

Regards.

Richard Francis President & CEO Biogen Idec Canada Inc. 3 Robert Speck Parkway, Suite 300 Mississauga, Ontario L4Z 2G5