

April 13, 2005

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Ms. Barbara Ouellet
Executive Director
Patented Medicine Prices Review Board
Standard Life Centre 333 Laurier Avenue West
Suite 1400, P.O. Box L40
Ottawa, ON K1P 1C1

CONSEIL D'EXAMEN
DU PRIX DES
MÉDICAMENTS BREVETÉS

3225-3-13

Re: PMPRB Proposed Amendments to the *Patented Medicines Regulations*

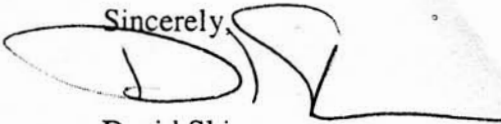
Dear Ms. Ouellet:

I would like to thank you for taking the time to meet with me on Wednesday April 13th 2005 to discuss the concerns of the self-care health product industry with price controls on patented self-care health products. As per our discussion, please consider this letter our official comments with respect to the PMPRB proposed amendments to the *Patented Medicines Regulations* as released in the January 2005 PMPRB *Notice and Comment* paper.

The fact that PMPRB is proposing changes to how the prices of patented veterinary medicines are regulated recognizes that there is a need to differentiate regulatory approaches between different classes of medicines. Similarly, the 2004 decision by PMPRB with respect to natural health products (NHPs) demonstrated both the ability and will to differentiate compliance activities for differing types of medicines. Due to the consumer-selection competitive market forces (Attachment A – Brogan Inc.) in the self-care health product retail markets, NDMAC recommends amending Section 2.2 by adding nonprescription medicines to the complaints-driven approach.

NDMAC is willing to work cooperatively with PMPRB on this issue to ensure a reasonable outcome. We trust our comments will be carefully considered by PMPRB before any final recommendations for amending the *Patented Medicines Regulations* are made. Thank you for your consideration, and we look forward to your response.

Sincerely,



David Skinner
President

Attached: Economic Analysis to Support PMPRB Issues Paper *Brogan Inc.* - April 2004

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