



Michael S. Cloutier  
President and C.E.O.

August 24, 2006

Patented Medicine Prices Review Board (PMPRB)  
Box L 40, Standard Life Centre  
333 Laurier Avenue West, 14th Floor  
Ottawa, Ontario, K1P 1C1  
Attention: Secretary of the Board

Dear Madame Dupont and Board Members,

**RE: Consultation on the Board's Excessive Price Guidelines**

In May 2006, the Patented Medicine Prices Review Board (PMPRB) initiated a consultation process on the board's excessive price guidelines and invited comments from stakeholders.

AstraZeneca Canada fully supports the position paper submitted by Canada's Research-Based Pharmaceutical Companies (Rx&D) to the PMPRB Board on this matter. We would, however, like to emphasize the following points with the Board.

First, based on this and previous discussion papers put forward by the Board, it is our view that the existing set of guidelines provides a sufficient framework for the PMPRB to effectively review the prices of patented medicines and to protect Canadians from patent abuse and excessive pricing practices.

Changes over time, such as the extension of the PMPRB's jurisdiction over the patent pending period prior to patent grant, monitoring of products with dedicated patents and the intended advanced notification of prices, support our assertion that the Board has been steadily expanding its jurisdiction beyond its stated mandate.

Changes to the excessive price guidelines will only move the Board further away from its purpose of price review and protection against excessive pricing into the area of price control. This shift in our view goes beyond the stated mandate of the Board as established in the Patent Act, a move that is viewed with great apprehension by AstraZeneca Canada and the industry as a whole.

Second, AstraZeneca Canada believes that the current system of categorization used by the PMPRB does not allow for adequate recognition of ongoing innovation within the products brought to Canadian patients by the industry. While the Board reviews product innovation within the rigid confines of a Category 2 classification, other key stakeholders consistently recognize value and innovation based on clinical experience and patient benefits.

Finally, it is of great concern to AstraZeneca Canada that restrictive pricing measures and controls are leading to a reduction of treatment choices available to Canadian physicians and patients. We believe it is critical to ensure that patients have access to the best available treatments and that physicians are able to effectively treat their patients - practicing best medicine and not approximate medicine.

Thank you for the opportunity to comment on the important questions. Please do not hesitate to contact the undersigned for further clarification on perspective regarding the above.

Sincerely,

A handwritten signature in blue ink, appearing to read "Michael S. Cloutier", written over a faint circular stamp.

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