



**Neighbourhood
Pharmacy**
Association of Canada

Association canadienne
**des pharmacies
de quartier**

365 Bloor Street East, Suite 2003
Toronto, ON M4W 3L4
T : 416.226.9100
F : 416.226.9185
info@neighbourhoodpharmacies.ca
neighbourhoodpharmacies.ca

Mr. Stephen Lucas
Deputy Minister
Health Canada
Brooke Claxton Building, Tunney's Pasture
Postal Locator: 0906C
Ottawa, Ontario K1A 0K9

May 27, 2020

Dear Deputy Minister Lucas,

On behalf of the Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies), we are writing to request a suspension of the August 2019 changes to the *Patented Medicines Regulations* to account for the COVID-19 pandemic. These changes are scheduled to take effect on July 1st, 2020 but are not, in our view, ready for implementation.

Neighbourhood Pharmacies is pleased to have had the opportunity to provide written submissions at every stage of the consultation process. Most recently (February 14th, 2020), we made a written submission to the consultation on proposed changes to the PMPRB guidelines. In this submission we expressed concerns on the unintended consequences for patients and pharmacies posed by the new guidelines. We pointed out that pharmaceutical manufacturers have patient support programs which enable the intensive pharmaceutical care required by patients with complex and often high cost treatments. Manufacturers, provinces and pharmacies need time to determine how to fund these programs in light of potential price decreases so that patients will face minimal disruption.

Implementation of the new regulations is less than 5 weeks away, however, new guidelines have not yet been published by PMPRB. This is completely understandable as all of us have been focused on addressing the COVID-19 situation. Health Canada, manufacturers and pharmacies have all been working hard to ensure the availability of pharmaceuticals for all Canadians. We have been pleased to work with federal government on these issues and have participated in weekly meetings with the Multi-Stakeholder Steering Committee on Drug Shortages since the middle of March. Unfortunately, our collective focus on COVID-19 has left us unprepared to deal with the approaching July 1st implementation date. Guidelines are not yet available and

manufacturers have not had time to consider the impact to patient programs as a result. We believe it is prudent to delay the implementation of the new PMPRB regulations until January 1st, 2021, or at least 4 months following publication of the guidelines.

Neighbourhood Pharmacies represents Canada's leading pharmacy organizations who are on the front line of the pandemic response delivering high value, quality care to Canadians through chain, banner, long-term care, specialty, and independent pharmacies as well as grocery chains and mass merchandisers with pharmacies. Our members are home to the most trusted providers of drug therapies, pharmacy-based patient services and innovative healthcare solutions. We advocate for community-based care through our members' high accessibility and proven track record of providing optimal patient care closer to where patients live and work. By leveraging nearly 11,000 pharmacies conveniently located in every community across Canada, Neighbourhood Pharmacies aims to advance sustainable healthcare for all stakeholders.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Hanna', with a stylized flourish at the end.

Sandra Hanna, RPh.
Chief Executive Officer