

**Donna Carbell**  
*Senior Vice President, Group Benefits*

September 26, 2016

Patented Medicine Prices Review Board  
(Rethinking the Guidelines)  
Box L40, 333 Laurier Avenue West, Suite 1400  
Ottawa, ON K1P 1C1

By email: [PMPRB.Consultations.CEPMB@pmprb-cepmb.gc.ca](mailto:PMPRB.Consultations.CEPMB@pmprb-cepmb.gc.ca)

Dear Patented Medicine Prices Review Board,

### **PMPRB Guidelines Modernization Discussion Paper**

I am writing in response to the request for feedback on the need for reform and the nature and scope of potential changes to the PMPRB Guidelines.

In addition to the Canadian Life and Health Insurance Association's (CLHIA) forthcoming response to your directed consultation on PMPRB guidelines modernization, we believe it is valuable to comment with Manulife's support for fundamental PMPRB reform.

Employer provided health benefits provide drug coverage to millions of Canadian workers and their families. Over the past few years, new high-cost specialty drugs have had an impact on private drug plans.

Manulife recognizes that high cost drugs offer solutions to populations who until now have had limited, or no pharmacological options to better manage their diseases. These medications are often medical breakthroughs, but can come at a significant cost.

The key concern from a sustainability perspective is how to manage the recent and forecasted increase in the number of high cost drugs and drug therapies available and being prescribed to patients. It is critical that Canadians are not paying too much for these drugs. Lowering the cost on all drugs, whether existing or new, helps to create the financial room to afford high value and appropriately priced biologic or speciality drugs.

The ultimate goal from a policy perspective must be to ensure that Canadians have access to the drugs they need without undue financial hardship as a result of prescription drug costs.

To support the sustainability of workplace drug benefit plans into the future, Manulife supports a more fundamental review of PMPRB's legislative and regulatory structure. The PMPRB should use a market-based approach to strive for the lowest possible price for Canadians. International price referencing should only be one input into what an appropriate price should be.

Manulife supports a sustainable pharmaceutical system where payers have the information they need to make smart reimbursement choices and Canadians have access to patented medicines at affordable prices.

We appreciate the opportunity to provide feedback into the consultation process.

Thank you,



Donna Carbell  
Senior Vice President, Group Benefits, Manulife

25 Water St. Kitchener, ON N2G 4Z4  
Bus: 519-594-6850 Ext. 246850

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