



**BEST
MEDICINES COALITION**

**Submission to Finance Canada:
Priorities for the Federal Budget**

Best Medicines Coalition



February 18, 2021

Priorities for the Federal Budget

Introduction

The Best Medicines Coalition (BMC), a national alliance of patient organizations together representing millions of patients, welcomes the opportunity to provide input to Finance Canada as part of its pre-budget consultation. This submission was informed by position documents developed in consultation with BMC's member organizations. Statements and recommendations expressed here reflect areas of consensus among the organizations listed at the end of this document.

Summary of recommendations

The BMC's focus is on ensuring that all Canadians have access to the medicines they need when they are needed. We provide recommendations regarding selected issues within the context of regulation and programs related to pharmaceutical care for Canadians, including drug price regulations, strategies to support patients with rare diseases, drug supply initiatives, and broad pharmaceutical care reform.

1. Drug price regulations (Patented Medicines Price Review Board)

- Canada needs pharmaceutical pricing rules which improve the affordability of medicines and encourage, not deter, the introduction of new medicines and vaccines plus clinical trials sponsored by drug developers, which provide patients with early access to promising therapies.
- To this end, we recommend a phased implementation of the pending Patented Medicines Regulations. Application of the new basket of comparator countries should proceed to bring down list prices, without delay. To not proceed with this aspect is costing both those vulnerable patients who are paying out of pocket, representing about 20 per cent of drug spending in Canada, and indeed all payers. The more complicated and untested economic factors should occur in a second phase, allowing for thorough evaluation of the initial impact of the changed comparator countries. These new economic factors are at the crux of concerns that the added regulations have created market uncertainty which threatens patient access to needed medicines.

2. Rare disease strategy

- BMC welcomes the opportunity to participate in the current consultation on a National Strategy for High-Cost Drugs for Rare Diseases. We urge the Government to engage fully with all stakeholders, including patients, as it moves forward and that the strategy be broad in scope and aimed at improving the lives of patients, moving beyond a limited focus on cost of therapies.
- Importantly, Canada's strategy on rare diseases must be fully resourced to be meaningful and effective, with funding allocations beyond previously announced levels. BMC supports a major increase in federal funding of health care. For example, the goal of paying at least 35% of health care expenditures, as requested by the Premiers in 2020, warrants full consideration.

3. Drug supply and shortages

- While drug shortages which lead to disruptions in patient care have been an ongoing issue, COVID-19 has further exposed significant weaknesses including regarding vaccines and therapeutics.
- The Government of Canada needs to pursue and adopt effective and proactive approaches to address drug supply challenges, including rebuilding domestic manufacturing, regarding COVID-19 and other treatments.
- We support expanded powers to address drug shortages and recommend that the new measures should be made permanent.

4. Comprehensive pharmaceutical policy reform

- Policy reform regarding how pharmaceuticals are managed and delivered must move forward to address the most critical disparities and inequities and ensure a comprehensive range of medicines are available to all, no matter where they live.
- Every patient needs drug insurance and reform in this area must address out of pocket costs to patients, reported to be more than 20 per cent.
- Streamlining infrastructure and processes, such as the proposed Canada Drug Agency (CDA), is imperative to eliminating waste and redundancy, and reduce wait times for patient access to new therapies. The CDA must not be an additional layer, but a modernization, with appropriate governance including patient representation, established by statutory law and subject to accountability, transparency, and Parliamentary oversight, unlike too many parts of the status quo.



About the Best Medicines Coalition

The Best Medicines Coalition is a national alliance of patient organizations, together representing millions of patients, with a shared goal of equitable, timely and consistent access for all Canadians to safe and effective medicines that improve patient outcomes. The BMC's areas of interest include drug approval, assessment, and reimbursement, as well as patient safety and supply issues. As an important aspect of its work, the BMC strives to ensure that Canadian patients have a voice and are meaningful participants in health policy development, specifically regarding pharmaceutical care. The BMC's core activities involve issue education, consensus building, and advocacy, making certain that patient-driven positions are communicated to decision makers and other stakeholders. The BMC was formed in 2002 as a grassroots alliance of patient advocates. In 2012, the BMC was registered under the federal Not-for-profit Corporations Act.



Alliance for Access to Psychiatric Medications
 Asthma Canada
 Brain Tumour Foundation of Canada
 Canadian Arthritis Patient Alliance
 Canadian Association of Psoriasis Patients
 Canadian Breast Cancer Network
 Canadian Cancer Survivor Network
 Canadian Council of the Blind
 Canadian Cystic Fibrosis Treatment Society
 Canadian Epilepsy Alliance
 Canadian Hemophilia Society
 Canadian PKU & Allied Disorders
 Canadian Psoriasis Network
 Canadian Skin Patient Alliance

Canadian Spondylitis Association
 CanCertainty
 Crohn's and Colitis Canada
 Cystic Fibrosis Canada
 Fighting Blindness Canada
 Health Coalition of Alberta
 Huntington Society of Canada
 Kidney Cancer Canada
 Lymphoma Canada
 Medical Cannabis Canada
 Medicines Access Coalition - BC
 Millions Missing Canada
 Ovarian Cancer Canada
 Parkinson Canada