



# BEST MEDICINES COALITION

## COALITION POUR DE MEILLEURS MÉDICAMENTS

Submission to Finance Canada:  
Priorities for the Federal Budget

### Best Medicines Coalition



February 25, 2022

## **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 has welcomed the opportunity to participate in consultations related to a National Strategy for Drugs for Rare Diseases, and we look forward to further deliberations. 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. Patients in Canada with rare disorders need and deserve timely access to available, medically necessary drugs, treatments, and other 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 the federal government paying at least 35% of health care expenditures (plus existing tax points), warrants full consideration.

**3. Drug and Vaccine supply and shortages**

- While drug shortages which disrupt 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 and vaccine supply challenges, including rebuilding domestic manufacturing, regarding COVID-19 and other conditions.

**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 of total drug expenditures.
- Streamlining infrastructure and processes, such as through 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, which has too many steps and takes too long to meet patient needs.



## 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, planning 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  
 Migraine Canada  
 Millions Missing Canada  
 Ovarian Cancer Canada  
 Parkinson Canada