



August 1, 2025

Input to Canada's Drug Agency on a National Bulk Purchasing Strategy

Overview:

The Best Medicines Coalition (BMC) commends the work of the National Bulk Purchasing Strategy Advisory Panel including its deliberations and in preparing a comprehensive draft report which presents a thoughtful approach to this important subject.

The BMC, with its 32 patient organization members, seeks timely access to a comprehensive range of medically necessary, safe, and effective drugs and related treatments, informed by patient-driven evidence and values, and delivered equitably and affordably to all patients. Evaluation of all elements of Canada's framework for managing and providing pharmaceutical care to patients, including new or proposed initiatives or reforms, such as possible national bulk purchasing or pooled procurement initiatives, is conducted through the lens of the above mission.

Principles and considerations:

As a coalition of patient organizations, the BMC has not yet formulated specific positions on all aspects of bulk purchasing or pooled procurement, particularly those of a commercial nature. However, the BMC supports in principle many elements outlined in the report, including: re-interpretation of the concept of bulk purchasing to a pooled procurement model; broadening the scope of the pCPA, especially by including other public plans; not creating an additional body to manage pooled procurement; and enhanced patient participation in any further considerations.

In addition, we offer patient-driven perspectives for the Advisory Panel to consider as it continues deliberations and prepares its final report and recommendations. Core patient-driven principles regarding pricing and purchasing of drugs and related treatments are provided below and we request that the Advisory Panel strengthen its emphasis on these goals and formulates recommendations with these principles in mind as it moves forward:

- The BMC supports a balanced approach with the goal of improving the affordability of medicines, both for individual patients and health care systems including public and private payors. Patients and their families, and those who pay on their behalf, bear the burden of excessive prescription medicine costs with significant impact, and we support efforts to address this.
- Of equal importance, patients need timely access to new safe and effective medicines which address unmet or inadequately met needs. There must be confidence, based on best available evidence, that all frameworks, price negotiation approaches and related guidelines will facilitate and not discourage or deter rapid introduction of a comprehensive range of medicines and vaccines as well as clinical trials which provide willing patients early access to promising new therapies.

In addition, we also suggest the following considerations for the Advisory Panel and any subsequent tables as the concept of bulk purchasing or pooled procurement is developed and possibly implemented:

- The BMC welcomes the opportunity to contribute input at this juncture as the Advisory Panel formulates advice. Moving forward, we urge the Advisory Panel to recommend a more fulsome approach to engagement of the patient community to inform frameworks and practices, including embedding a diverse range of voices in policy setting, direction and decision making.
- We encourage the Advisory Committee to implement or recommend rigorous impact assessment of specific frameworks and processes to enable meaningful evaluation. The BMC seeks assessment and analysis which would address whether implementation of a bulk purchasing or pooled procurement model will contribute to improved timely and comprehensive access to medically necessary drugs and related treatments. Such analysis would focus on drugs and related treatments for unmet needs assessing if access is improved or diminished along with other important measures.



About the Best Medicines Coalition

The Best Medicines Coalition is a national alliance of 32 patient organizations. The BMC seeks timely access to a comprehensive range of medically necessary, safe, and effective drugs and related treatments, informed by patient-driven evidence and values, and delivered equitably and affordably to all patients in Canada. 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 include issue education, consensus-based position development, 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 and operates under the direction of a Board of Directors comprised of representatives of member organizations and elected annually.



Alliance for Access to Psychiatric Medications
 Asthma Canada
 Brain Tumour Foundation of Canada
 Canadian Arthritis Patient Alliance
 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 Skin Patient Alliance
 Canadian Spondyloarthritis Association
 CanCertainty
 Crohn's and Colitis Canada
 Cystic Fibrosis Canada

Eczema Society of Canada
 Fighting Blindness Canada
 Health Coalition of Alberta
 Huntington Society of Canada
 Kidney Cancer Canada
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