



March 3, 2008

Our Ref: 11756

Dr. Brien Benoit
Chairperson
Patented Medicine Prices Review Board
Box L40
Standard Life Centre
333 Laurier Avenue West
Suite 1400
Ottawa, ON K1P 1C1

Dear Dr. Benoit:

Thank you for the opportunity to respond to the Discussion Paper on *Options for Possible Changes to the Patented Medicines Regulations, 1994 and the Excessive Price Guidelines*.

The Federal Superannuates National Association (FSNA) has more than 155,000 members that have confirmed that advocating to obtain cost-effectiveness and safe medicines is one of the key priorities for the organization. FSNA is committed to working with all levels of government to ensure that our members and seniors across Canada do not suffer financial hardship to pay for the drugs that will improve their health and well-being.

The National Pharmaceuticals Strategy Progress Report dated June 2006, states that, "Prescription drugs are the leading cost driver in the health care system." This not only puts our health care system at risk but also the sustainability of all provincial and other drug plans, for which the majority of seniors are covered at some level of reimbursement.

FSNA supports the four proposed circumstances for a price review under section i) Any Market Price Review, as they respond to the issue of inconsistent drug prices across the provinces.

FSNA further supports section ii) Re-Setting the Maximum Non-Excessive (MNE) Price, specifically the following:

2. When the scientific information / evidence available at the time the medicine was first introduced was not sufficient to determine with confidence its category of therapeutic improvement, or when new post-market evidence suggests the initial categorization was inappropriate; and

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3. When the Median of the International Price Comparison is the pivotal test and the medicine is sold in too few countries at introduction.

FSNA supports a combination of i) and ii) with respect to the timeframe for review:

Maintain the status quo for the timeframe of 3 years or when the medicine is sold in at least 3 countries but, in the future, align it with the timeframes adopted under Health Canada's proposed Progressive Licensing Initiative when implemented.

FSNA supports your mandate and efforts to ensure that medicine prices are not excessive and that Canadians have access to the best prices.

Thank you again for this opportunity and we invite comments or questions you may have on our response to the Discussion Paper.

Yours truly,



G. Dennis Jackson
National President

GDJ/hc