



March 3, 2008

Sylvie Dupont
Secretary of the Board
Patented Medicine Prices Review Board
Box L40, Standard Life Centre
333 Laurier Avenue West, Suite 1400
Ottawa, Ontario, K1P 1C1

Dear Ms. Dupont:

This is in response to your request for comments on the Patented Medicine Prices Review Board (PMPRB) Discussion Paper "Options for Possible Changes to the *Patented Medicines Regulations*, 1994 and the Excessive Price Guidelines."

In Section III, regarding the proposed scenarios for any market price review, New Brunswick agrees that PMPRB should look at prices in each jurisdiction to ensure they are not excessive. Smaller jurisdictions have less leverage to negotiate prices and this would ensure the prices are not excessive at introduction or in future years.

In Section IV, regarding the regulatory options, New Brunswick has concerns regarding option 2 to exempt payments to third-party payers. If such payments are exempted, this would prevent PMPRB from obtaining and reporting on actual average price trends and prevent smaller jurisdictions from knowing and comparing their prices with those in other jurisdictions.

In Section IV, regarding the guidelines options, if either of the proposed options is adopted, New Brunswick would agree that there should be some restraint on a single year price increase. Otherwise, there may be significant unexpected pressures on provincial drug program budgets which could impact formulary listing decisions.

Thank you for the opportunity to provide feedback on the Discussion Paper.

Sincerely,

Leanne Jardine
Director
NB Prescription Drug Program



"Our department
promotes a
scent-reduced
environment."

« Notre ministère
préconise un environnement
où les produits parfumés sont
utilisés avec plus de discrétion. »

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