

**Life Sciences Ontario submission to
CADTH consultation on a pan-canadian national formulary
February 25, 2022**

Question 9. Are there any other comments that you would like to share with us?

Life Sciences Ontario is pleased to provide the following overarching comments related to the proposed national formulary:

-Many of the most fundamental questions related to the creation of a national formulary are explicitly excluded from the consultation document. It is difficult to provide informed feedback without first understanding how a national drug list would be used, by whom, and under what conditions. Moreover, very few details are provided on how the proposed national formulary would integrate within existing coverage and reimbursement systems or impact other pharmaceutical policy initiatives. This is pertinent information that needs further clarification.

-It is not entirely clear what problem this exercise is trying to solve, given that the vast majority of Canadians have access to medicines benefits programs, or could have access to first-dollar coverage if they applied, and everyone has access to “catastrophic” drug insurance. Moreover, as health and pharmaceutical coverage remains a provincial responsibility, the most pragmatic approach would be to increase federal health transfers to the provinces, so they can close existing coverage gaps, reduce or eliminate co-pays, and expand their programs to cover more medicines than they currently do.

-A missing element in the proposed guiding principles for the national formulary is a principle for innovation and economic growth. The COVID-19 pandemic has made it abundantly clear that having a strong life sciences sector is critical for our health and economic security. It has also highlighted the importance of medical innovation and having access to as many different treatment tools as possible. Governments across Canada are now taking steps to build these capabilities and ensure that we are prepared for future challenges, e.g., the federal government’s Biomanufacturing and Life Sciences Strategy, which has identified aligned governance (Pillar 1) and world class regulations (pillar 2) as priorities. In this context, any new pharmaceutical initiatives, such as a potential national formulary, should align with federal and provincial life sciences growth efforts and promote the adoption of a wide array of new health innovations.

- A logical next step in discussions regarding the creation of a new national drug formulary would be to convene a high-level, multi-stakeholder forum, to help advance dialogue and connect the dots between the many different but interconnected pharmaceutical policy issues and initiatives to ensure they align rather than work against each other. This could be done, for instance, by reconvening the work of the Health & Biosciences Economic Strategy Table (HBEST), which would help ensure an all-of-government approach and avoid siloed policymaking.

Thank you for the opportunity to provide input.

Sincerely,
Jason Field
President & CEO
Life Sciences Ontario