



July 31, 2020

VIA EMAIL: PMPRB.Consultations.CEPMB@pmprb-cepmb.gc.ca

Dr. Mitchell Levine
Chair, Patented Medicine Prices Review Board
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Ottawa, Ontario K1P 1C1

This document represents Knight Therapeutics submission to the consultation on the PMPRB draft Guidelines of June 19, 2020. Knight has significant concerns regarding the draft Guidelines and the implication these changes will have on our ability, as a Canadian company, to bring products to Canadian patients.

Knight's position is aligned with the written submission presented by IMC in respect to the Draft Guidelines. The IMC written submission provides robust feedback regarding the industry's concerns around the technical aspects of the Guidelines, as well as highlights the lack of transparency and clear understanding of how the Guidelines will be applied in real life (i.e. how generics will be applied in the calculation of the dTCC). We ask that Knight's written submission be read in conjunction with the IMC written submission.

We look forward to participating in the next steps of the consultation, which we trust will include integrated industry and PMPRB technical working groups that are given sufficient time and scope to come up with practicable and fair solutions.

Sincerely,

Samira Sakhia


Samira Sakhia (Jul 31, 2020 13:03 EDT)

President and Chief Operating Officer

Jody Engel



Vice President Commercial Operations Canada