

October 19th, 2007

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

Re: Regulations Amending the Patented Medicines Regulations, 1994

Dear Ms. Dupont:

On behalf of our members, BIOTECCanada is submitting our opinions regarding the proposed amendments to the *Patented Medicines Regulations, 1994*, announced in the Canada Gazette (Part I) on October 6th, 2007 by the Patented Medicine Prices Review Board (PMPRB).

With respect to the Amendments, BIOTECCanada is most concerned with the proposed changes to Average Price Calculation. According to the proposal, "patentees would be required to report the types of benefits deducted in the average price calculation." BIOTECCanada notes the possibility that such requirement will discourage patentees from offering benefit programs to Canadian consumers. We believe that such information does not provide material benefits to PMPRB, yet creates significant reporting difficulties and costs to patentees. The Board should require a patentee to provide information on types of benefit on a case-by-case basis when such information becomes crucial. We are confident that the Board will proceed with this issue in the best interest of Canadian public and patentees.

In the past two years, PMPRB has started parallel consultations to amend regulations and guidelines. These changes, together with any possible changes due to the dovobet case, are all interrelated and should not be managed separately. BIOTECCanada looks forward to seeing a simple, stable and predictable pricing environment for Canadian biotechnology industry in the future.

Thank you for your attention. Please feel free to contact me should you have any question.

Sincerely,



Peter A. Brenders
President and CEO