

May 6, 2026

Hon. Marjorie Michel
Minister of Health, Health Canada
House of Commons
Ottawa, Ontario
K1A 0A6

Re: Safeguarding Canada’s life science ecosystem under global economic and trade pressures

Dear Minister Michel,

On behalf of the Ontario Chamber of Commerce and its [Health Policy Council](#), which represents leading stakeholders from across the health and life sciences sectors, I am writing to urge the federal government to take decisive action to protect Canadian interests amidst an emerging realignment of the global life sciences landscape.

U.S. policies linking their drug prices to those in other countries risk influencing global investment and drug launch decisions¹, with significant consequences for Canadians. Canada and the U.S. share a deeply integrated life sciences trade partnership. In 2024, the U.S. accounted for 76.8 per cent of pharmaceutical exports² and 73 per cent of medical device exports.³ This cross-border exchange underpins access to life-saving medicines, vaccines, medical devices and technologies, and treatments in both countries.

Canada is exposed given its inclusion in international pricing benchmarks and existing gaps in biopharmaceutical investment, scale-up financing, and time-to-patient access. This risks undermining Canada’s ability to attract investment, sustain innovation, and deliver timely access to new therapies.

To mitigate these impacts, Canada must scale domestic research and development (R&D), while preparing for potential impacts on global pricing and trade on pharmaceutical and medical device/technology products.

¹ [The Most-Favored-Nation Policy: Outlook and Implications Beyond U.S. | PharmExec](#)

² <https://ised-isde.canada.ca/site/canadian-life-science-industries/en/biopharmaceuticals-and-pharmaceuticals/pharmaceutical-industry-profile>

³ <https://ised-isde.canada.ca/site/canadian-life-science-industries/en/medical-devices/industry-profile>

Canada's Life Sciences Opportunity

Canada's biopharmaceutical industry is a key driver of economic growth, contributing \$18.4 billion in economic activity in 2022 (a 15 per cent increase from 2021)⁴, investing \$3.2 billion in R&D, and supporting over 110,000 full-time jobs (up nearly 8 per cent year-over-year).⁵ Despite positive momentum, access to new treatments remains slow. New medicines face an average two-year delay before receiving public drug plan funding following regulatory approval and launch, while public coverage for new medical technologies typically takes around 30 weeks post-approval.^{6 7}

Should global pricing flexibility narrow, Canadian public drug plans may also face higher negotiation demands and a reduced ability for manufacturers to offer price concessions. This would result in slower listings, increased drug costs on public formularies, restrictive coverage criteria, and higher premiums, particularly for specialty drugs, creating barriers to timely access. These risks are especially acute for Canadians living with rare diseases, many of whom already face limited treatment options and prolonged access to care.

We commend the federal government for launching the first phase of the National Strategy for Drugs for Rare Diseases, reflecting a commitment to improving patient outcomes, national consistency, and system sustainability while investing in innovation. However, Canada's capacity to deliver on these goals is under strain: the nation's share of global clinical trials has fallen by almost half, from 6 per cent in 2010 to 3.1 per cent in 2022⁸, signalling a decline in life sciences investment. Evolving changes in international reference pricing and trade risks are accelerating this trend, in which companies may scale back clinical trials and early-stage development in Canada, reducing incentives and investment in pursuing breakthrough therapies and further delaying access to patients.

To safeguard the nation's bio-pharmaceutical industries and patient outcomes, we recommend that the government of Canada pursue the following priorities:

1. Increase federal investment in innovative medicines with flow-through to provinces/territories.
2. Advance market access reform at the Patented Medicine Prices Review Board's (PMPRB), Canada Drug Agency (CDA) and pan-Canadian Pharmaceutical Alliance (pCPA). This includes:
 - a. Assess the PMPRB basket of countries to better reflect global realities;

⁴ <https://www150.statcan.gc.ca/n1/pub/11-621-m/11-621-m2025004-eng.pdf>

⁵ <https://www150.statcan.gc.ca/n1/pub/11-621-m/11-621-m2025004-eng.pdf>

⁶ <https://innovativemedicines.ca/newsroom/all-news/innovative-medicines-canada-urges-provinces-to-accelerate-access-to-medicines/>

⁷ <https://www.fraserinstitute.org/sites/default/files/2024-12/waiting-your-turn-2024.pdf>

⁸ https://innovativemedicines.ca/wp-content/uploads/2023/05/6354_IMC_ResearchNote_ClinicalTrialsCanada_2023_v3-1.pdf

- b. Review CDA's cost-effectiveness assessments to better reflect patient needs, outcomes, and market pathways for new medicines;
 - c. Adapt the pCPA discounts to global standards; and
 - d. Implement accelerated access pilots (i.e., Ontario's Funding Accelerated for Specific Treatments (FAST) program) and expand existing federal programs (i.e., Non-Insured Health Benefits for First Nations and Inuit (NIHB), Veterans Affairs' Treatment Benefits Program) to adopt faster coverage approvals for eligible therapies through pCPA.
3. Collaborate with provincial and territorial governments through the Federal Task Force on Pharmaceuticals & Life Sciences to support a competitive pharmaceutical and life sciences sector and provide sustainable access to pharmaceutical products and treatments for patients.
 4. Strengthen intellectual property protections. This includes:
 - a. Providing two additional years of data protection for biologics; and
 - b. Enabling patent-term restoration of up to three years, aligning Canada with international jurisdictions (i.e., U.S., Europe).

As global trade and pricing dynamics threaten the sustainability of our life sciences sector, Canada must act proactively and in partnership to protect its innovation ecosystem and ensure all Canadians have timely access to the treatments and medicines they need.

We welcome the opportunity to discuss these recommendations and support a coordinated response that positions Canada as a resilient, globally competitive leader in life sciences.

Sincerely,



Daniel Tisch, APR, FCPRS, ICD.D
President and CEO
Ontario Chamber of Commerce

CC:

Maggie Chi, Parliamentary Secretary to the Minister of Health
Shalene Curtis-Micallef, Deputy Minister of Health Canada
Mauro Chies, CEO, pan-Canadian Pharmaceutical Alliance
Suzanne McGurn, President and Chief Executive Officer, Canada Drug Agency
Guillaume Couillard, Director General, Patented Medicine Prices Review Board
Robin Saccon, Chair, OCC Health Policy Council & VP, Public Affairs, BD Canada