

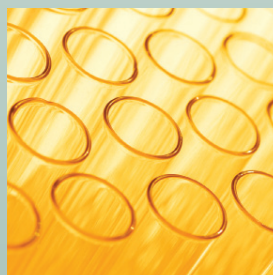
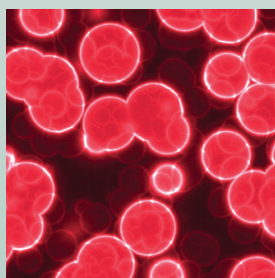
June 2011

Access Delayed, Access Denied

Waiting for New Medicines in Canada

2011 Report

by Mark Rovere and Dr. Brett J. Skinner



Studies in Health Policy

June 2011

Access Delayed, Access Denied Waiting for New Medicines in Canada 2011 Report

by Mark Rovere and Dr. Brett J. Skinner

Contents

Summary / iv

Highlights / 1

Introduction / 2

Global factors affecting access to new medicines / 3

Delays caused by the federal government / 5

Delays caused by provincial governments / 9

Total delay for access to new medicines / 11

Denials of reimbursement by provincial governments / 13

Comparing coverage delays in public and private drug insurance / 15

Conclusions / 26

Policy options—improving access to new drugs / 27

Appendix—classes, data sources, and comparability / 31

References / 36

About the authors / 41

Disclosure / 42

Publishing information / 43

Supporting the Fraser Institute / 44

About the Fraser Institute / 45

Peer Review / 45

Editorial Advisory Board / 46

Summary

Federal and provincial government policies create unnecessary delays for patients wanting access to new drug treatments

The federal government does not allow patients to use new drugs until Health Canada has reviewed each product's safety and effectiveness information. The latest data show that in 2009 Health Canada took 472 days on average to approve new drugs, up from 388 days in 2008. Health Canada took longer to approve new drugs than regulators in Europe in all four years studied (2006 to 2009) and longer than the American FDA in five of the last six years studied (2004 to 2009). Relative to other countries, Canadian patients wait too long for government permission to use new drug treatments.

Due to budget constraints, provincial public drug plans refuse to pay for most new drugs, even when Health Canada says they are safe and effective. The latest data show that, of the new drugs approved by Health Canada each year from 2004 to 2009, the average coverage rate across provincial public drug programs was less than 23% by June 9, 2011. By contrast, the average coverage under private drug plans over the same period was almost 83%, and occurred far more rapidly than under public drug plans. People in public drug plans would have better access to new drugs if they belonged to a private drug plan.

What can governments do?

International safety standards are similar, so the federal government could speed up access to new drugs by harmonizing with European and American regulatory processes through mutual recognition of drug approval decisions. Provincial governments could improve access without increasing the burden on taxpayers, by replacing existing public drug plans with a regulated, competitive, private-sector market, in which universal access to catastrophic drug insurance would be facilitated through means-tested subsidies for people with low incomes.

Highlights

- In total, Canadians wait over two years (on average) for access to publicly insured drugs.
- Health Canada's approval times consistently decreased from 2004 to 2008, but then increased in 2009
- Health Canada's performance was worse than that of the European EMEA in all four years studied (2006, 2007, 2008, and 2009).
- Health Canada's performance was worse than that of the American FDA in five of the last six years studied (2004 to 2009).
- Only a small percentage of the new drugs that Health Canada certifies as safe and effective are finally declared eligible for reimbursement under provincial public drug programs.
- The provincial governments take a long time to approve the few drugs that they declare eligible for public reimbursement.
- Private drug insurance in Canada covers significantly more new drugs than public drug insurance.
- Private drug insurance in Canada covers new drugs more rapidly than public drug insurance.

Introduction

Access Delayed, Access Denied is the Fraser Institute's fifth annual report measuring delays in the approval of new drugs by Health Canada, and rates of coverage for new drugs under provincial public drug plans, relative to private-sector drug plans. This report provides patients with information they need to determine whether the time they wait for access to new medicines in Canada is unnecessarily long, and whether publicly funded and managed drug-insurance programs provide adequate benefits and choice for patients. We hope that this report will encourage policy makers to consider financially sustainable policy alternatives that give consumers greater choice.

Access Delayed, Access Denied focuses on new patented medicines because this class of drugs is uniquely affected by public policies that delay access for patients. Because government approval of generic drugs is based on the assumption that generics are copies of new drugs that have previously been approved, there is no substantive delay (observed or expected) before the public has access to generic products; consequently, this class of drugs is not studied in this report.

Global factors affecting access to new medicines

It takes a long time to develop a new drug. The development period for new drugs is measured from the patented discovery of a new drug molecule to the first time an application is submitted for marketing approval anywhere in the world. Governments around the world regulate drugs to ensure the safety of the product. For example, Health Canada has a national mandate to ensure the safety of all drugs sold in Canada and thus it regulates which products are allowed to be sold and under what conditions. Health Canada approves new pharmaceutical medicines through the Therapeutic Products Directorate (TPD) and approves new biological medicines through the Biologics and Genetic Therapies Directorate (BGTD). Canadian regulations fall under the 1985 Food and Drugs Act.

In order to obtain marketing approval for a drug, manufacturers must provide Health Canada with evidence of its successful clinical testing. The longest period within the drug-development phase involves clinical testing of a new medicine on volunteer patients. Clinical testing of new drugs involves thousands of patients who are often located across international jurisdictions and monitored over many years. No drug is submitted for marketing approval anywhere in the developed world without having first completed successful clinical tests.

The cost of, and time spent in, the development of new drugs is affected by universal scientific standards of experimental research. These standards determine, for example, how many patients must be enrolled in the testing of a new drug in order for researchers to have confidence in the statistical results and conclusions. There are also scientific standards for the design and conduct of clinical drug testing in patient populations, as well as ethical standards with respect to the treatment and use of human and animal subjects. These standards have international acceptance and affect the absolute minimum period of time it takes to complete clinical testing of the safety and effectiveness of any new medicine. International scientific standards for clinical trials are established by the World Medical Association Declaration of Helsinki (World Medical Association, 1964). These are generally interpreted as the minimum global standard. In practice, actual standards for demonstrating the safety of drug products are set by national governments through domestic regulation. These standards determine the number, length, and rigor of the required clinical trials. For instance, Health Canada's regulations require minimum compliance with international standards for clinical research on

new medicines but do not exclude stricter regulations as deemed necessary by the government of Canada (Health Canada, 2006a). Nevertheless, because of the importance of the American and European markets throughout the world, the actual minimum time spent during drug development is determined by the clinical testing time necessary to satisfy the requirements of the US Food and Drug Administration (FDA) and the European Medicines Agency (EMA).

The most recent research indicates that, on a global basis, the process of developing a new drug takes, on average, about 10 years (DiMasi, 2001; DiMasi et al., 1995, 2003; Adams and Brantner, 2006). The process is measured from the time a drug discovery is patented to the time an application for FDA marketing approval is made (table 1). Moreover, this lengthy development process comes with a steep price. The cost of developing a new patented prescription drug ranges from \$521 million to \$2,119 million, depending on the company and the drug. The average cost is \$868 million (above figures adjusted to 2000 US dollars) (DiMasi, 2001; DiMasi et al., 1995, 2003; Adams and Brantner, 2003, 2006).

For the purposes of this report, the global development time for new medicines is assumed to be a function of factors outside of Canada's control; therefore, the time associated with this segment is presented for completeness but is not the focus of the main policy discussion in this paper, nor is it part of the overall wait time for access to new medicines measured here. This paper is primarily concerned with government policies that contribute to an unnecessary delay in access to new medicines after the lengthy period of time it takes to develop them in the first place.

Table 1: Estimated time (in months) from issuance of a new drug patent to application for US FDA regulatory/marketing approval, drugs approved between 1985 and 2000

Patented discovery to start of human clinical trials	52.0 months
Start of human clinical trial to new drug application for US FDA marketing approval	72.1 months
Total	124.1 months (10.3 years)

Source: DiMasi et al., 1995, 2003.

Delays caused by the federal government

After the development phase is over, the first segment of the wait for new medicines that is affected by public policies and institutional performance in Canada is the wait for the federal government to approve the safety and effectiveness of new drugs. Before any new drug is legally allowed to be sold in Canada, it must first receive official approval from Health Canada. Health Canada reviews published clinical research conducted on new drugs before it certifies that a drug is safe for sale in Canada and that the drug's effectiveness has been scientifically demonstrated.¹ Because marketing approval for new drugs occurs at the national level and applies to all drugs sold in Canada, any delay caused by Health Canada's drug review process affects the wait time for access to new medicines for all Canadians, regardless of whether they are publicly insured, privately insured, or uninsured.

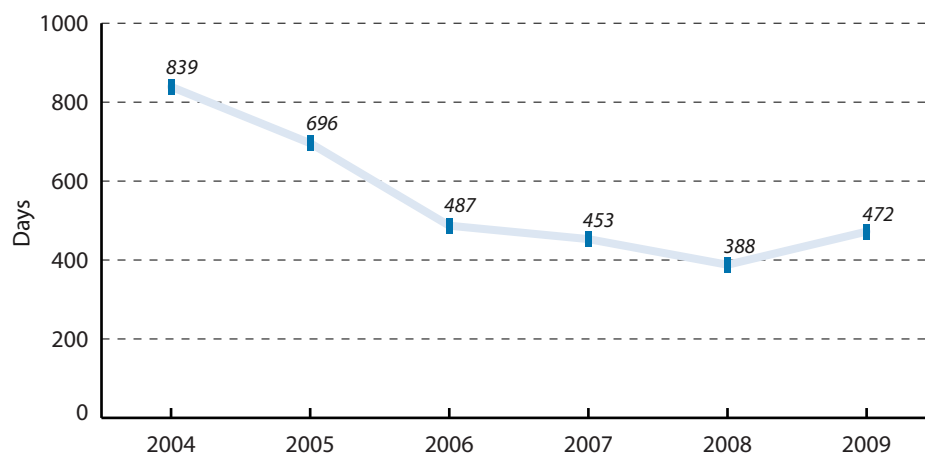
In Canada, the time patients spend waiting for the federal government's approval of a new drug is measured from the date the drug manufacturer's application for approval is recorded or filed in the Central Registry (CR) of Health Canada's Therapeutic Products Directorate (TPD) or Biologics and Genetics Therapies Directorate (BGTD) following the completion of clinical testing. This approval period ends when Health Canada issues an official Notice of Compliance (NOC), certifying that the new drug is safe and effective. Drug approval systems in Europe and the United States measure the same period but use different terminology for describing the start and end dates. As of 1999, responsibility for approving both pharmaceutical and biologics medicines was centralized for all European Union countries in the European Medicines Agency (EMA). Since 2004, the equivalent authority to approve pharmaceutical and biological medicines in the United States has been the Department of Health and Human Services (HHS) with the Center for Drug Evaluation and Research (CDER), part of the Food and Drug Administration (FDA). Prior to 2004, the Center for Biologics Evaluation and Research (CBER) was the approving authority for biological medicines.

Drug approval times in Canada, 2004–2009

In 2004, Health Canada took 839 days (on average) to issue a Notice of Compliance (NOC) (figure 1). In comparison, Health Canada took 696 days

¹ For general information about Canada's review process, see Health Canada, 2001.

Figure 1: Weighted average delay (days) for Health Canada to grant regulatory and marketing approval for new drugs (NDS), 2004–2009



Sources: Health Canada, 2010, 2011; calculations by authors

to grant market authorization for new medicines in 2005, 487 days in 2006, 453 days in 2007, 388 days in 2008, and 472 days in 2009. This data suggests that Health Canada's approval times improved significantly from 2004 to 2008, but increased in 2009.²

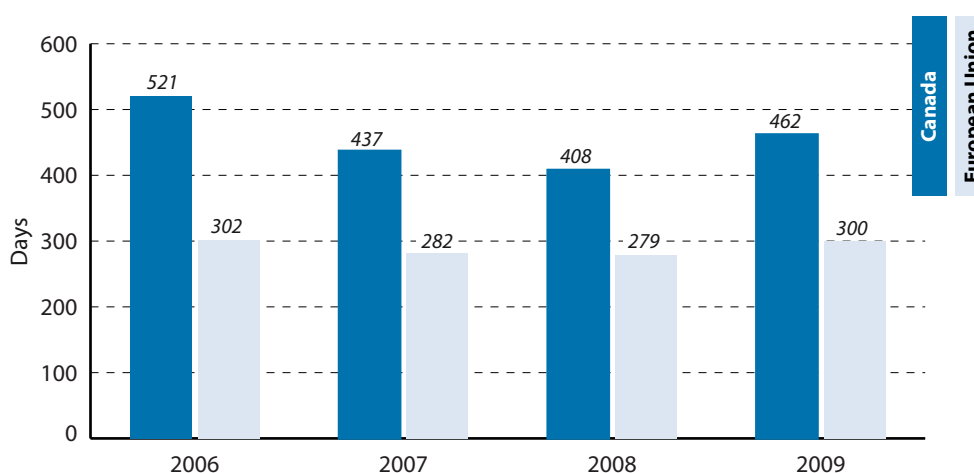
Drug approval times in Canada and the European Union, 2006–2009

The Canadian data presented here are different from the Canadian data shown in the previous section because the data in the previous section are weighted by biologic and pharmaceutical drug type. Unfortunately, the EMEA data available for this study were not detailed enough to permit the calculation of an average that is weighted by drug type. To make the Canadian and European data comparable, the data for Health Canada and the EMEA are shown as non-weighted, consolidated averages across biologic and pharmaceutical drug types.

The data indicate that, in all four years observed, Health Canada took longer (on average) than the European Medicines Agency (EMA), its European equivalent, to grant market approval for new drugs (figure 2³). In 2006, Health Canada took 521 days (on average) to approve new medicines,

- 2 The data indicate that from 2004 to 2009, Health Canada consistently received a higher number of new drug submissions for both biologic and pharmaceutical medicines. Thus, Health Canada's improvement in the approval delay for new drugs (2004–2008) is not due to fewer drugs being submitted for review. Instead, the data indicate that Health Canada's performance improved in real terms over the four-year period.
- 3 Figure 2 shows the average number of days spent waiting for the approval of new medicines in the European Union and Canada in 2006, 2007, 2008, and 2009, the only years

Figure 2: Non-weighted consolidated average delay (days) for regulatory and marketing approval of new drugs, Canada and the European Union, 2006–2009



Sources: Health Canada, 2010, 2011; EMEA, 2007, 2008, 2009, 2010; calculations by authors.

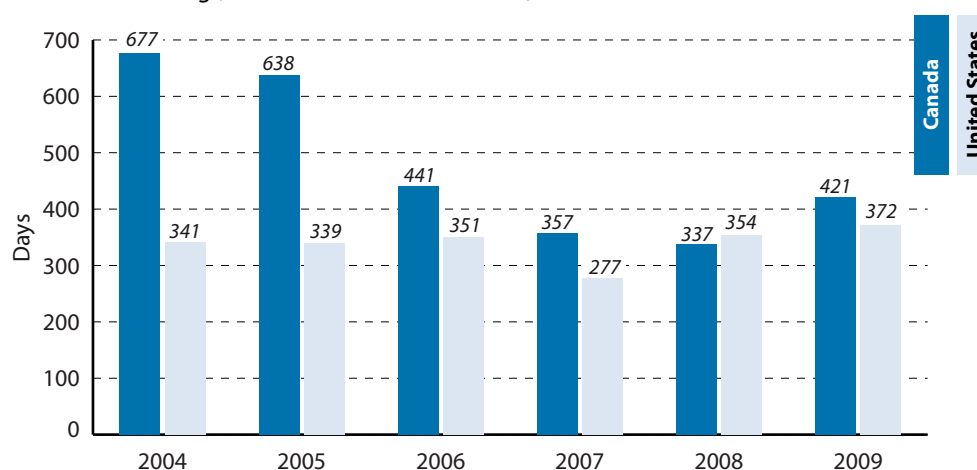
while the EMEA took 302 days. In 2007, Health Canada took 437 days (on average) to grant market authorization for new medicines, while the EMEA took 282 days. In 2008, Health Canada took 408 days (on average) to approve new medicines, while the EMEA took 279 days. Likewise, Health Canada took 462 days (on average) to certify new medicines in 2009, while the EMEA took 300 days.

Drug approval times in Canada and the United States, 2004–2009

The Canadian data presented here are different from those in previous sections because they are based on a different method of aggregating the statistics. In the previous sections, the statistics were aggregated on the basis of averages. However, the United States (FDA) only publishes median figures for drug approval times. Fortunately, Health Canada also publishes median figures, making comparisons to the US data possible. The data for both Canada and the United States are detailed enough to permit a calculation of a weighted average of the medians according to drug submission category (priority or non-priority). However, the US data does not allow weighting by drug type (biologic or pharmaceutical). Figure 3 displays the differences between median approval times (weighted average medians) in Canada and the United States for new drug applications between 2004 and 2009. The data indicate that, from 2004 to 2007, Health Canada took longer (on average) than the FDA to grant marketing approval for new drugs. In 2004, Health Canada

for which comparable data are available because of changes in data reporting by the European Medicines Agency

Figure 3: Weighted average median delay (days) for regulatory and marketing approval of new drugs, Canada and the United States, 2004–2009



Sources: Health Canada, 2009a, 2010; US FDA, 2009a, 2010; calculations by authors.

took approximately 677 days to approve new drugs, while the FDA took 341 days. In 2005, Health Canada's median approval time to grant market authorization for new drugs was 638 days, while the FDA's median approval time was 339 days. In 2006, Health Canada took 441 days to approve new drugs, while the FDA took 351 days. In 2007, Health Canada's median approval time to grant market authorization for new drugs was 357 days, while the FDA's median approval time was 277 days. In contrast, in 2008, Health Canada took less time than the FDA to grant market approval for new drugs. As figure 3 shows, Health Canada took 337 days to approve new drugs in 2008 while the FDA took 354 days. However, the most recent data indicate that, in 2009, Health Canada's median approval time was 421 days compared to the FDA's median approval time of 372. Thus, although Health Canada's median approval time was slightly shorter than the FDA's in 2008; Health Canada took longer than the FDA to grant market authorization for new drugs in five of the last six years observed in this study.

Delays caused by provincial governments

The second segment of the wait for new medicines that is affected by government policies and institutional performance is the time spent by the federal,¹ provincial, and territorial (FPT) governments to decide whether to reimburse a new drug under their respective publicly funded drug insurance programs. Each jurisdiction determines reimbursement eligibility through its own government agency; consequently, the wait time for access to new medicines differs by jurisdiction. This wait is measured from the date on which Health Canada issues a Notice of Compliance (NOC) for a new drug to the date on which the first public reimbursement (PR) of the same drug is recorded in the formularies of each federal, provincial, and territorial drug program.

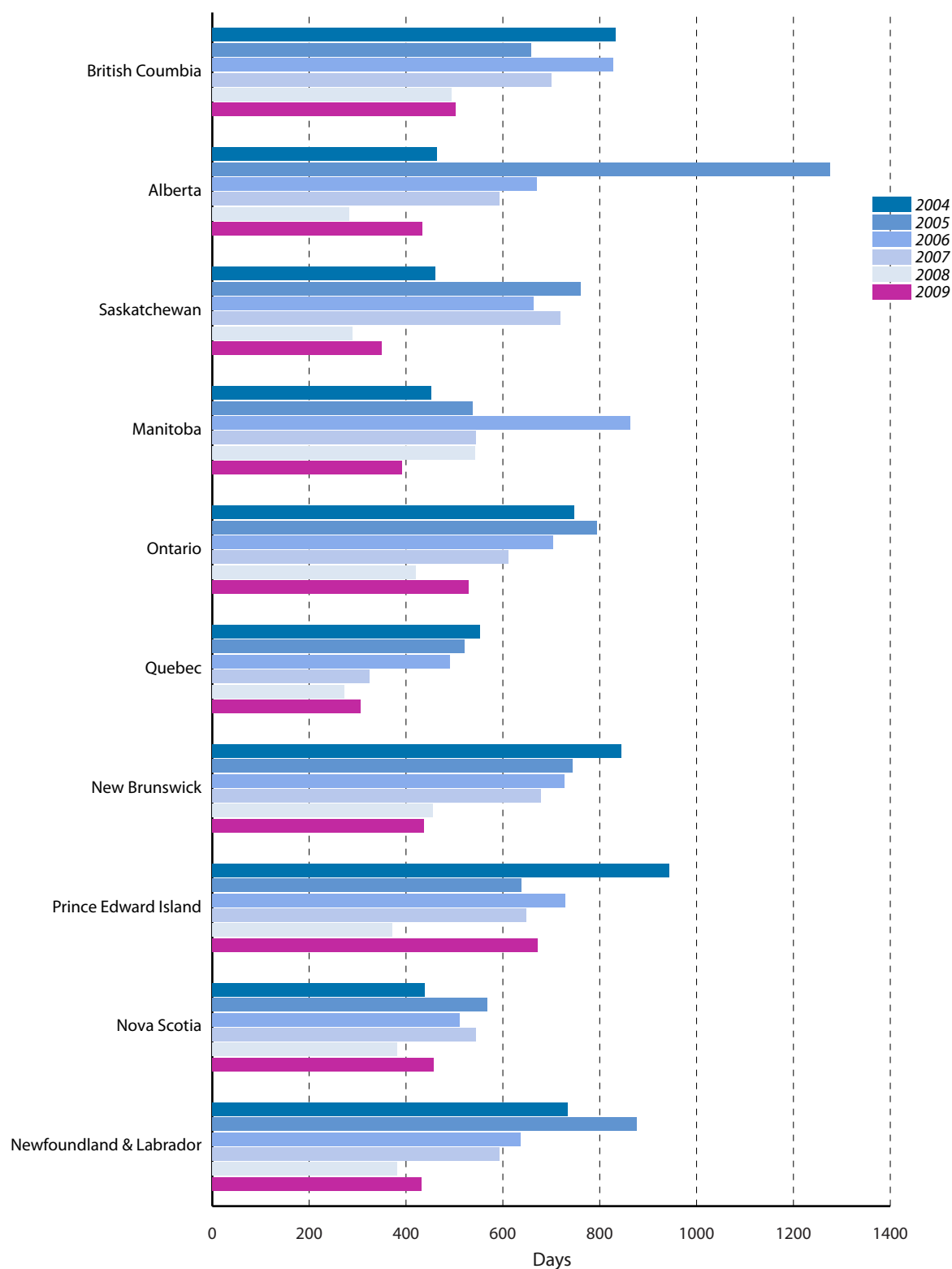
Provincial reimbursement delays, 2004–2009

Federal, provincial, and territorial authorities have three options when determining reimbursement eligibility under public drug plans. First, they can declare a drug ineligible for public reimbursement. Second, they can declare a drug eligible for full reimbursement without conditions. Third, they can declare a new medicine eligible for reimbursement with restrictions. The analysis presented here considers any type of approval (full or restricted) to be an approval for the purpose of measuring and comparing performance between jurisdictions. The analysis does not present data on reimbursement delays for federal or territorial government drug programs but is focused only on the performance of provincial drug plans.

The average time taken by the provinces to grant reimbursement eligibility for new drugs that were approved by Health Canada in 2004 was 647 days; the average for new drugs that received market approval in 2005 was 737 days; the average for new drugs approved in 2006 was 682 days; the average for new medicines approved in 2007 was 596 days; the average for new drugs approved in 2008 was 390 days; and the average for new drugs approved in 2009 was 451 days (figure 4).

¹ The government of Canada, through various programs, provides prescription drug coverage for about one million Canadians who are members of eligible groups. These groups include First Nations and Inuit, members of the military, veterans, members of the RCMP, and inmates in federal penitentiaries.

Figure 4: Weighted average time (days) between Health Canada regulatory and marketing approval and provincial public reimbursement approval for new medicines, by province, 2004–2009



Sources: Health Canada, 2011; Brogan Inc., 2011; calculations by authors.

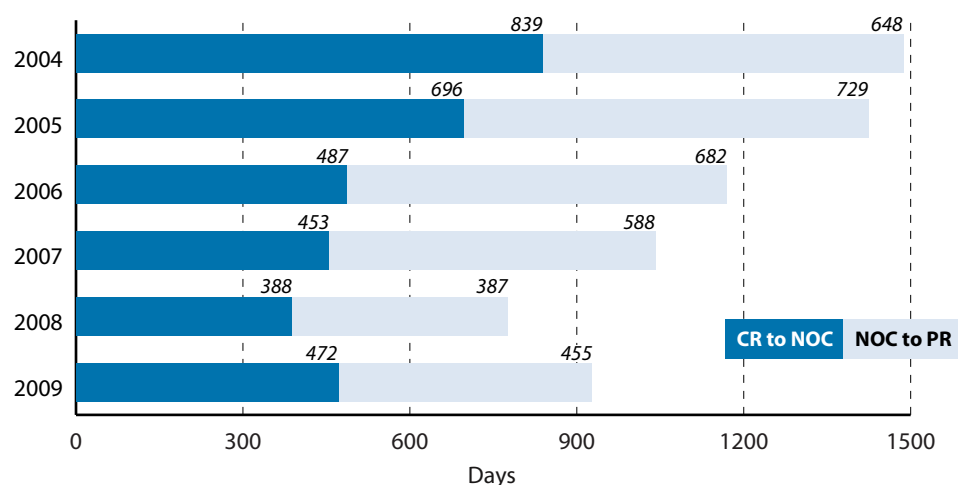
Total delay for access to new medicines

An estimate of the total time spent waiting for access to new medicines after they have been developed can be calculated by adding the time taken by Health Canada to issue a safety approval (CR to NOC) and the provincial reimbursement delay (NOC to PR). Figure 5 shows the consolidated average wait for access to new medicines, measured in days, for the years 2004, 2005, 2006, 2007, 2008, and 2009. This wait time is measured in days and is presented as a weighted average for pharmaceutical and biological drugs, including all new drugs classified by Health Canada as new drug submissions (NDS) and excluding supplemental new drug submissions (SNDS).

National delay

Reading left to right in figure 5, the first segment of the bar represents the average time taken by Health Canada to certify that new drugs are safe and effective. Delays in approval of new drugs by Health Canada were shorter in 2008 than in the previous four years, but slightly longer in 2009. In 2004,

Figure 5: Weighted average total delay (days) for access to publicly insured new medicines in Canada, by wait segment, averaged across all provinces, 2004–2009



Abbreviations: **CR**: the date the drug manufacturer's application for marketing approval is recorded or filed in Health Canada's Central Registry. **NOC**: the date Health Canada issues an official Notice of Compliance, certifying that the new drug is safe and effective and is legally approved for sale in Canada. **PR**: the date on which the first public reimbursement of the new drug is recorded in the formularies of each provincial drug program.

Sources: Health Canada, 2010, 2011; Brogan Inc., 2011; calculations by authors.

Health Canada took an average of 839 days to approve new medicines, compared to 696 days in 2005, 487 days in 2006, 453 days in 2007, 388 days in 2008, and 472 days in 2009.

Provincial delay

The second segment of the bar in figure 5 represents the average wait time for insured access to new medicines for patients who are covered under provincial publicly funded drug programs. The delay between Health Canada's certification of new drugs and provincial reimbursement for them has fluctuated since 2004. Patients relying on public drug programs waited approximately 648 days on average for drugs that were approved by Health Canada in 2004, before they were given approval for public reimbursement. However, for new drugs approved by Health Canada in 2005, the average wait for reimbursement approval increased to 729 days. The average wait for provincial reimbursement fell to 682 days for new drugs approved in 2006, to 588 days for new drugs approved in 2007, and to 387 days for new drugs approved in 2008. While the average wait for reimbursement approval consistently decreased from 2005 to 2008, the average wait for public reimbursement of new drugs certified by Health Canada in 2009 increased to 455 days.

Total delay

Adding together the wait times from the first and second segments, the total average wait for patients dependent on public drug programs for insured access to new medicines was 927 days (approximately 2.5 years) for new drugs approved by Health Canada in 2009. The total average wait has significantly decreased from an average of 1,487 days (approximately 4.1 years) in 2004. While this represents an improvement, overall waits for access to new medicines remain significant. One underappreciated consequence of this delay is that, in the meantime, patients are not experiencing the potential health benefits that may result from earlier access to innovative new drug treatments.

Denials of reimbursement by provincial governments

It is important to examine provincial reimbursements, not just in terms of delays, but also in terms of denials of access. Although most provinces have reduced the number of days that patients must wait to have new drugs publicly reimbursed, this does not necessarily mean that the overall percentage of drugs that eventually become eligible for reimbursement has remained the same. Provincial agencies could be taking less time to review and grant reimbursement approval for new drugs because fewer drugs are ultimately being accepted for reimbursement. Reimbursement approval rates are estimated by calculating the number of full or partial reimbursement approvals recorded in each province (as of June 9, 2011) as a percentage of the total number of drugs already approved as safe and effective (i.e., drugs issued a NOC) by Health Canada in each year.

The analysis shows that most of the drugs that are approved by Health Canada as safe and effective are not declared eligible for reimbursement under provincial drug plans. Averaged across all provincial public drug programs, as of June 9, 2011, only 23.0% of all drugs that Health Canada approved as safe and effective in 2004 had actually been approved for reimbursement (fully or partially) by the provinces; compared to 19.3% of new drugs certified in 2005, 31.0% of new drugs certified in 2006, 25.5% of new drugs certified in 2007, 25.3% of new drugs certified in 2008, and 13.1% of new drugs certified in 2009 (table 2a). The coverage rate averaged across all years was less than 23%.

In contrast, the analysis shows that the majority of new drugs that are approved by Health Canada as safe and effective are eventually covered by at least one private insurer. As table 2b shows, averaged across all provinces, 97.9 % of all new drugs that Health Canada approved as safe and effective in 2004 were covered by at least one private insurer as of June 9, 2011. Likewise, 90.9 % of new drugs certified in 2005, 82.0 % of new drugs certified in 2006, 73.8 % of new drugs certified in 2007, 68.8 % of new drugs certified in 2008, and 82.2 % of new drugs certified in 2009 were covered by at least one private insurer (averaged across all provinces) as of June 9, 2011. The coverage rate averaged across all years was almost 83%.

Table 2a: Public reimbursement approvals, as a percentage of NDS-class drugs approved by Health Canada, by province, 2004–2009, as of June 9, 2011

	2004		2005		2006		2007		2008		2009	
	Number of drugs approved	Drugs approved as a % of NOCs	Number of drugs approved	Drugs approved as a % of NOCs	Number of drugs approved	Drugs approved as a % of NOCs	Number of drugs approved	Drugs approved as a % of NOCs	Number of drugs approved	Drugs approved as a % of NOCs	Number of drugs approved	Drugs approved as a % of NOCs
AB	8	17.0%	4	9.1%	12	24.0%	5	11.9%	6	18.8%	6	13.3%
BC	10	21.3%	2	4.5%	9	18.0%	7	16.7%	8	25.0%	10	22.2%
MB	9	19.1%	5	11.4%	11	22.0%	8	19.0%	6	18.8%	1	2.2%
NB	11	23.4%	12	27.3%	23	46.0%	16	38.1%	11	34.4%	4	8.9%
NL	11	23.4%	9	20.5%	18	36.0%	11	26.2%	10	31.3%	4	8.9%
NS	9	19.1%	13	29.5%	16	32.0%	9	21.4%	7	21.9%	5	11.1%
ON	8	17.0%	7	15.9%	11	22.0%	11	26.2%	7	21.9%	4	8.9%
PEI	9	19.1%	8	18.2%	13	26.0%	7	16.7%	2	6.3%	4	8.9%
QC	20	42.6%	14	31.8%	24	48.0%	22	52.4%	14	43.8%	16	35.6%
SK	13	27.7%	11	25.0%	18	36.0%	11	26.2%	10	31.3%	5	11.1%
Provincial average		23.0%		19.3%		31.0%		25.5%		25.3%		13.1%
Total NDS NOCs	47		44		50		42		32		45	

Note: Provinces often take more than a year to decide whether or not to make a new drug eligible for public reimbursement. Therefore, more new drugs that were approved by Health Canada in the observed years could eventually be granted eligibility for public reimbursement in the future. The delay will be captured in future reports and will be reflected in the percentages shown above.

Note: Total NDS NOCs include all available data from Brogan Inc.

Source: Health Canada 2011b; Brogan Inc., 2011; calculations by authors.

Table 2b: Drugs covered by at least one private insurer, as a percentage of NDS-class drugs approved by Health Canada, averaged across all provinces, as of June 9, 2011.

	2004		2005		2006		2007		2008		2009	
	Number of drugs covered by at least one private insurer	Drugs covered as a % of NOCs	Number of drugs covered by at least one private insurer	Drugs covered as a % of NOCs	Number of drugs covered by at least one private insurer	Drugs covered as a % of NOCs	Number of drugs covered by at least one private insurer	Drugs covered as a % of NOCs	Number of drugs covered by at least one private insurer	Drugs covered as a % of NOCs	Number of drugs covered by at least one private insurer	Drugs covered as a % of NOCs
	47	97.9%	40	90.9%	41	82.0%	31	73.8%	22	68.8%	37	82.2%
Total NDS NOCs	47		44		50		42		32		45	

Note: Total NDS NOCs include all available data from Brogan Inc.

Source: Health Canada 2011; Brogan Inc., 2011; calculations by authors.

Comparing coverage delays in public and private drug insurance

Like last year's report, this study compares the reimbursement delays of new drugs under private drug-insurance plans with delays measured under public drug plans. Using this data, we are able to measure the difference (in days) taken by both public and private drug insurance schemes to grant reimbursement approval for new drugs.¹ Only those drugs that received a Notice of Compliance from Health Canada in 2004, 2005, and 2006 are used for comparison as they will provide a comprehensive dataset.²

Tables 3a to 5b include all new drugs (NDS) that received market approval by Health Canada in 2004, 2005, and 2006 that are available in Brogan Inc.'s database. Pharmaceutical and biologic drugs are separated by drug type and are listed in alphabetic order. The tables display the delay (in days) for each new drug between Health Canada's Notice of Compliance and the drug's first listing (reimbursement) on any provincial public drug plan; and the delay (in days) between market approval and the drug's first paid claim registered with any private drug insurer. The data is aggregated across all provincial public drug plans and private drug insurers, and is current up to June 9, 2011.

As tables 3a to 5b show, there are a number of new drugs that were approved by Health Canada in 2004, 2005, and 2006 that have been claimed for reimbursement by private insurers, but have yet to be approved for reimbursement by public drug plans. As shown in table 3a, only 20 (60.6%) of the 33 new pharmaceutical drugs that received market approval by Health Canada in 2004 have been approved for public reimbursement by at least one of the provincial drug plans as of June 9, 2011. In contrast, the data indicate that all 33 (100%) of the new pharmaceutical drugs approved by Health Canada in 2004 have been claimed for reimbursement by at least one private insurer. Likewise, as shown in table 3b, public drug programs (at least one) have approved only 4 (33.3%) of the 12 new biologic drugs that were issued a Notice of Compliance from Health Canada in 2004 as of June 9, 2011; compared to 11 (91.7%) that have been claimed by at least one private insurer. As

¹ See Appendix: data sources and comparability issues.

² As noted above, provincial drug plans often take years to issue public reimbursement approval.

Table 3a: Pharmaceutical drugs, 2004—first listing on a public drug insurance plan (aggregated across all provincial drug plans), first claim with a private drug insurance plan (aggregated across insurance companies and provinces), and the difference in days between first listing on a public drug plan and first claim with a private insurance plan, for all new pharmaceutical drugs that received a Notice of Compliance from Health Canada in 2004, as of June 9, 2011

NDSs that were issued a Notice of Compliance (NOC) by Health Canada in 2004	Delay (in days) between NOC and 1st Listing on Public Drug Plans (aggregated across all provinces)	Delay (in days) between NOC and 1st Claim on Private Drug Plans	Difference in Days
ADDERALL XR	866	24	842
ACTIVELLE	Not listed	345	N/A
AVANDARYL	Not listed	586	N/A
BONVIVA	Not listed	1000	N/A
CIPRALEX	1411	61	1350
CIPRO XL	147	20	127
CIPRODEX	1331	59	1272
CLIMARA PRO	1761	1545	216
CLOBEX	Not listed	146	N/A
EBIXA	301	16	285
FACTIVE	Not listed	385	N/A
FASLODEX	Not listed	134	N/A
FROVA	Not listed	1244	N/A
LEVITRA	Not listed	16	N/A
MULTIHANCE	672	904	–232
NUVARING	873	247	626
OXYTROL	224	121	103
PENLAC	Not listed	104	N/A
PREFESTA	Not listed	92	N/A
PREVACID	Not listed	132	N/A
PREVACID FASTAB	1177	34	1143
RELPAK	300	99	201
SENSIPAR	667	80	587
SONOVUE	Not listed	541	N/A
STRATTERA	285	61	224
TELZIR	173	69	104
TEVETEN PLUS	246	63	183
TIAZAC XC	142	145	–3
VFEND	285	–44	329
VIGAMOX	143	63	80
YASMIN 21	173	28	145
ZAVESCA	Not listed	517	N/A
ZYMAR	214	–144	358

Sources: Health Canada, 2011; Brogan Inc., 2011; calculations by authors.

displayed in table 4a, only 13 (48.1%) of the 27 new pharmaceutical drugs that received market approval by Health Canada in 2005 have been approved for public reimbursement by at least one of the provincial drug plans as of June 9, 2011; compared to 26 (96.3%) that have been claimed for reimbursement by at least one private insurer. Similarly, as shown in table 4b, public drug programs (at least one) have approved only 6 (35.3%) of the 17 new biologic drugs that were issued a Notice of Compliance from Health Canada in 2005 as of June 9, 2011; compared to 14 (82.4%) that have been claimed by at least one private insurer. As shown in table 5a, only 22 (62.9%) of the 35 new pharmaceutical drugs that received market approval by Health Canada in 2006 were approved for public reimbursement by at least one of the provincial drug plans as of June 9, 2011; compared to 31 (88.6%) that have been claimed by at least one private insurer. Likewise, as of June 9, 2011, public drug programs (at least one) have approved only 5 (33.3%) of the 15 new biologic drugs that were issued a Notice of Compliance from Health Canada in 2006, compared to 9 (60%) of the 15 that have been claimed by at least one private insurer (table 5b).

Table 3b: Biological drugs, 2004—first listing on a public drug insurance plan (aggregated across all provincial drug plans), first claim with a private drug insurance plan (aggregated across insurance companies and provinces), and the difference in days between first listing on a public drug plan and first claim with a private insurance plan, for all new biological drugs that received a Notice of Compliance from Health Canada in 2004, as of June 9, 2011

NDSs that were issued a Notice of Compliance (NOC) by Health Canada in 2004	Delay (in days) between NOC and 1st Listing on Public Drug Plans (aggregated across all provinces)	Delay (in days) between NOC and 1st Claim on Private Drug Plans	Difference in Days
ALDURAZYME	Not listed	65	N/A
AMEVIVE	Not listed	245	N/A
FABRAZYME	Not listed	434	N/A
FORTEO	1946	69	1877
HUMIRA	192	23	169
INFANRIX-HEXA	Not listed	1608	N/A
MYOBLOC	Not listed	Not claimed	N/A
NEULASTA	568	48	520
OVIDREL	Not listed	61	N/A
PEGASYS RBV	189	32	157
REPLAGAL	Not listed	397	N/A
XOLAIR	Not listed	92	N/A

Sources: Health Canada, 2011; Brogan Inc., 2011; calculations by authors.

Table 4a: Pharmaceutical drugs, 2005—first listing on a public drug insurance plan (aggregated across all provincial drug plans), first claim with a private drug insurance plan (aggregated across insurance companies and provinces), and the difference in days between first listing on a public drug plan and first claim with a private insurance plan, for all new pharmaceutical drugs that received a Notice of Compliance from Health Canada in 2005, as of June 9, 2011

NDSs that were issued a Notice of Compliance (NOC) by Health Canada in 2005	Delay (in days) between NOC and 1st Listing on Public Drug Plans (aggregated across all provinces)	Delay (in days) between NOC and 1st Claim on Private Drug Plans	Difference in Days
ACLASTA	275	112	163
ADVICOR	362	142	220
ANGELIQ	Not Listed	1203	N/A
APTIVUS	314	46	268
CADUET	318	103	215
COVERSYL	Not Listed	359	N/A
EMTRIVA	Not Listed	−298	N/A
ENABLEX	1356	178	1178
FINACEA	Not Listed	17	N/A
GLUMETZA	Not Listed	164	N/A
INOMAX	Not Listed	Not Claimed	N/A
KIVEXA	163	29	134
LYRICA	243	67	176
MACUGEN	338	172	166
MENOSTAR	Not Listed	38	N/A
MYFORTIC	243	102	141
NIASPAN	209	−32	241
PMS-HYDROCHLOROTHIAZIDE	100	−343	443
PRAVASA	Not Listed	177	N/A
SATIVEX	Not Listed	67	N/A
SUBUTEX	Not Listed	17	N/A
TARCEVA	1333	600	733
TRAMACET	Not Listed	13	N/A
UROMAX	365	201	164
VELCADE	Not Listed	99	N/A
XYREM	Not Listed	740	N/A
ZEMPLAR	Not Listed	678	N/A

Sources: Health Canada, 2011; Brogan Inc., 2011; calculations by authors.

Table 4b: Biological drugs, 2005—first listing on a public drug insurance plan (aggregated across all provincial drug plans), first claim with a private drug insurance plan (aggregated across insurance companies and provinces), and the difference in days between first listing on a public drug plan and first claim with a private insurance plan, for all new biological drugs that received a Notice of Compliance from Health Canada in 2005, as of June 9, 2011

NDSs that were issued a Notice of Compliance (NOC) by Health Canada in 2005	Delay (in days) between NOC and 1st Listing on Public Drug Plans (aggregated across all provinces)	Delay (in days) between NOC and 1st Claim on Private Drug Plans	Difference in Days
AVASTIN	1940	9	1931
BEXXAR	Not Listed	707	N/A
BRAVELLE	1889	81	1808
ERBITU	Not Listed	252	N/A
FSME-IMMUN	Not Listed	132	N/A
INFLUVAC	Not Listed	89	N/A
KEPIVANCE	Not Listed	1251	N/A
LEVEMIR PENFILL	631	90	541
LUVERIS	Not Listed	33	N/A
MABCAMPATH	Not Listed	359	N/A
OCTAGAM	Not Listed	Not Claimed	N/A
OCTAPLAS	Not Listed	Not Claimed	N/A
RABAVERT	428	17	411
RAPTIVA	799	22	777
SOMAVERT	Not Listed	221	N/A
SOMAVERT	Not Listed	325	N/A
ZEVALIN	267	Not Claimed	N/A

Sources: Health Canada, 2011; Brogan Inc., 2011; calculations by authors.

Table 5a: Pharmaceutical drugs, 2006—first listing on a public drug insurance plan (aggregated across all provincial drug plans), first claim with a private drug insurance plan (aggregated across insurance companies and provinces), and the difference in days between first listing on a public drug plan and first claim with a private insurance plan, for all new pharmaceutical drugs that received a Notice of Compliance from Health Canada in 2006, as of June 9, 2011

NDSs that were issued a Notice of Compliance (NOC) by Health Canada in 2006	Delay (in days) between NOC and 1st Listing on Public Drug Plans (aggregated across all provinces)	Delay (in days) between NOC and 1st Claim on Private Drug Plans	Difference in Days
ABRAXANE	Not listed	363	N/A
ACTONEL PLUS CALCIUM	266	36	230
ACTONEL SACHET KIT	Not listed	66	N/A
ACZONE	Not listed	Not claimed	N/A
ALTACE HCT	328	7	321
ALVESCO	148	22	126
ARESTIN MICROSPHERES	Not listed	1043	N/A
AZILECT	174	41	133
BARACLUDE	236	110	126
BIPHENTIN	413	148	265
CHILDRENS IBUPROFEN	Not listed	524	N/A
DUOTRAV	198	54	144
EXJADE	256	37	219
FOSAVANCE	333	47	286
FOSRENOL	839	120	719
IBUPROFEN LIQUID FILLED CAPSULES	Not listed	149	N/A
NEXAVAR	560	25	535
NORLEVO	1062	1117	-55
PMS-URSODIOL	Not listed	558	N/A
PMS-URSODIOL C	136	159	-23
PREXIGE	Not listed	22	N/A
PREZISTA	194	34	160
REVATIO	257	46	211
SEBIVO	Not listed	133	N/A
SOMATULINE AUTOGEL	411	312	99
SONOVUE	Not listed	Not claimed	N/A
SUTENT	201	56	145
TESTIM	504	385	119
TOBRAMYCIN FOR INJECTION	1392	886	506
TROSEC	264	247	17
TRUVADA	268	102	166
VANTAS	Not listed	Not claimed	N/A
VESICARE	352	170	182
VOLUVEN	Not listed	Not claimed	N/A
ZYTRAM XL	Not listed	85	N/A

Sources: Health Canada, 2011; Brogan Inc., 2011; calculations by authors.

Table 5b: Biological drugs, 2006—first listing on a public drug insurance plan (aggregated across all provincial drug plans), first claim with a private drug insurance plan (aggregated across insurance companies and provinces), and the difference in days between first listing on a public drug plan and first claim with a private insurance plan, for all new biological drugs that received a Notice of Compliance from Health Canada in 2006, as of June 9, 2011

NDSs that were issued a Notice of Compliance (NOC) by Health Canada in 2006	Delay (in days) between NOC and 1st Listing on Public Drug Plans (aggregated across all provinces)	Delay (in days) between NOC and 1st Claim on Private Drug Plans	Difference in Days
ADVATE	Not listed	Not claimed	N/A
APIDRA	1027	1017	10
GAMMAGARD	Not listed	639	N/A
GARDASIL	Not listed	36	N/A
IGIVNEX	Not listed	Not claimed	N/A
MENACTRA	Not listed	177	N/A
MENOPUR	1490	32	1458
MYOZYME	543	1078	-535
ORENCIA	358	49	309
QUIXIL	Not listed	Not claimed	N/A
ROTATEQ	Not listed	64	N/A
SANDOGLOBULIN NF	Not listed	Not claimed	N/A
TYSABRI	734	116	618
VIVAGLOBIN	Not listed	Not claimed	N/A
WILATE	Not listed	Not claimed	N/A

Sources: Health Canada, 2011; Brogan Inc., 2011; calculations by authors.

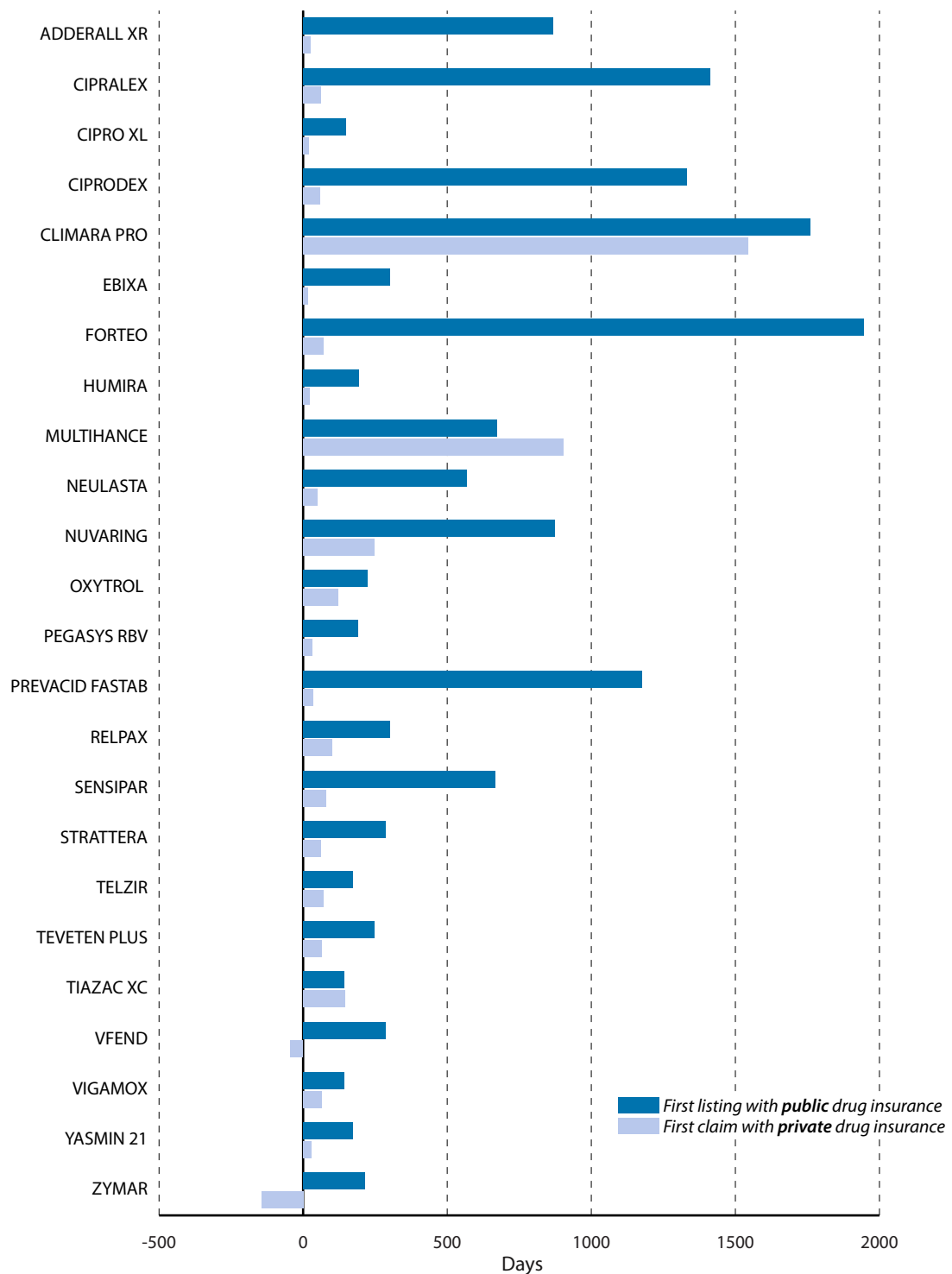
Difference in coverage delays between provincial drug plans and private insurance

Figures 6, 7, and 8 display the difference in days between the first claim that was made with a private insurance plan and the first listing of the drug with a public insurance plan (aggregated across provinces) for all drugs that received a Notice of Compliance from Health Canada in 2004, 2005, and 2006 (pharmaceutical and biological) that have been approved for reimbursement by at least one public and private drug insurance plan as of June 9, 2011.

In some extreme cases, such as the biological drug *Forteo* (figure 6), the difference in reimbursement approval between public and private drug insurance was 1877 days (approximately 5.1 years). In general, the data indicate that private drug insurance (at least one insurer) covers new drugs approved by Health Canada much earlier than any provincial public drug plan (with the exception of *Norlevo* in figure 7).³

3 The drugs *Vfend* and *Zymar* (figure 6), and *Niaspan* and *PMS-Hydrochlorothiazide* (figure 7) have negative delays between Health Canada's Notice of Compliance and the date on which a claim was made to a private insurer. A negative delay indicates that a patient had access to a drug before Health Canada's approval through the Special Access Programme (SAP). The SAP authorizes access to a drug that has not been approved by Health Canada for patients with a serious life-threatening condition (*Health Canada, 2002*).

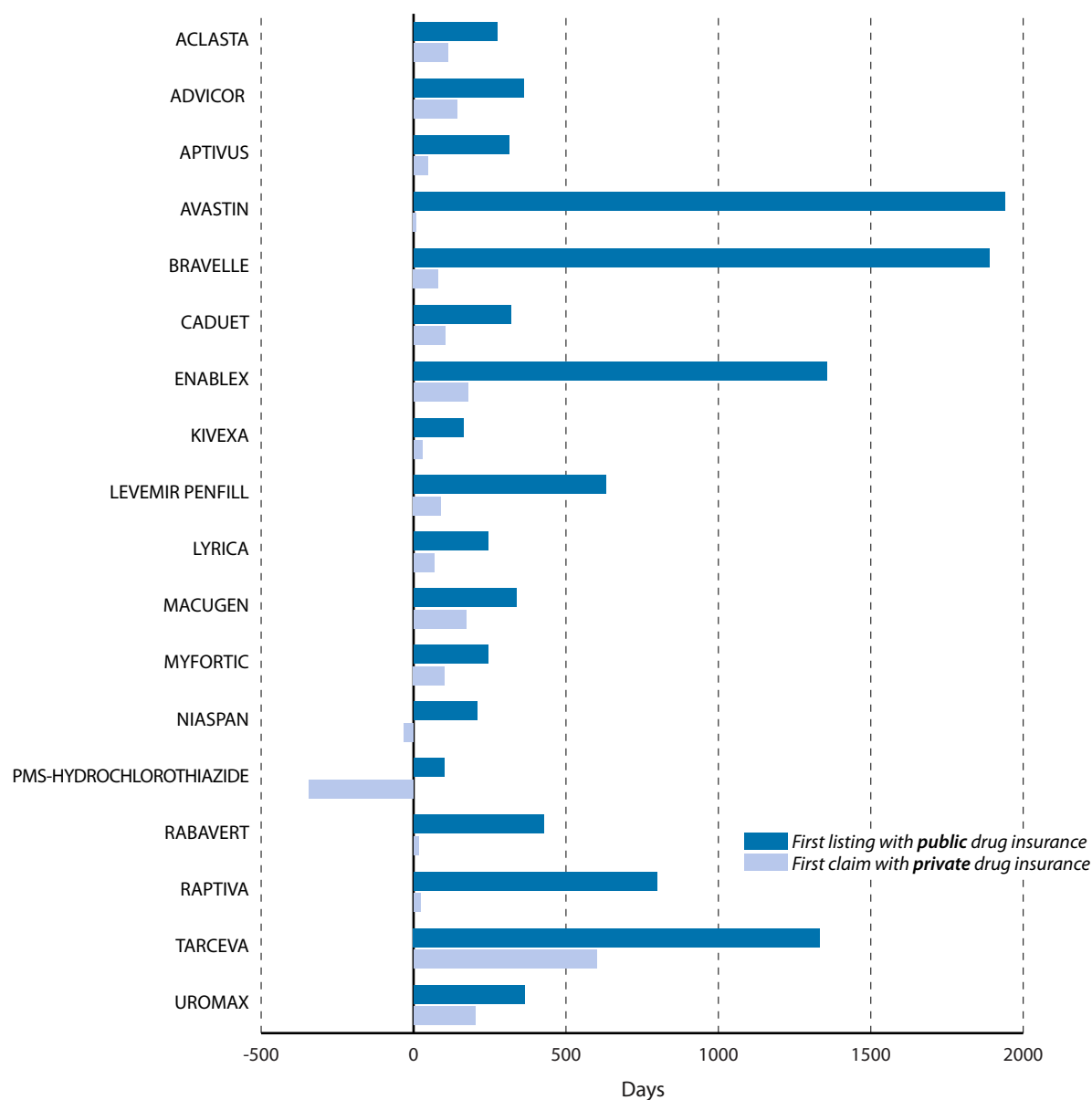
Figure 6: **Difference** (in days), **2004**, between the first listing with a public insurance plan and the first claim with a private insurance plan for new drugs that received a Notice of Compliance from Health Canada, aggregated across all provinces and drug plans



Note: includes only drugs approved for reimbursement by at least one public and private insurer as of June 9, 2011.

Sources: Health Canada, 2011; Brogan Inc., 2011; calculations by authors.

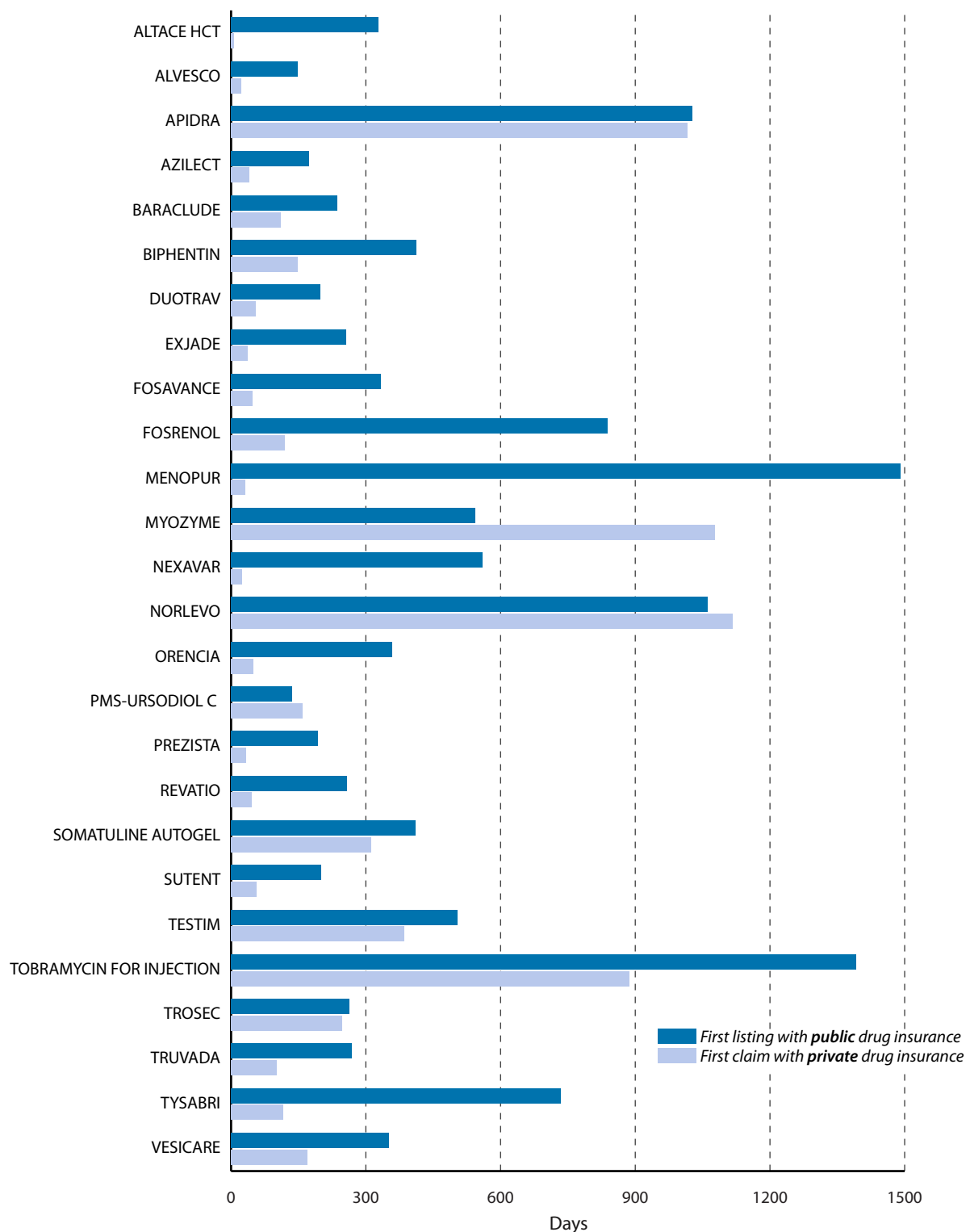
Figure 7: Difference (in days), 2005, between the first listing with a public insurance plan and the first claim with a private insurance plan for new drugs that received a Notice of Compliance from Health Canada, aggregated across all provinces and drug plans



Note: includes only drugs approved for reimbursement by at least one public and private insurer as of June 9, 2011.

Sources: Health Canada, 2011; Brogan Inc., 2011; calculations by authors.

Figure 8: **Difference (in days), 2006, between the first listing with a public insurance plan and the first claim with a private insurance plan for new drugs that received a Notice of Compliance from Health Canada, aggregated across all provinces and drug plans**



Note: includes only drugs approved for reimbursement by at least one public and private insurer as of June 9, 2011.

Sources: Health Canada, 2011; Brogan Inc., 2011; calculations by authors.

Conclusions

- In total, Canadians wait over two years (on average) for access to publicly insured drugs.
- Health Canada's approval times consistently decreased from 2004 to 2008, but then increased in 2009
- Health Canada's performance was worse than that of the European EMEA in all four years studied (2006, 2007, 2008, and 2009).
- Health Canada's performance was worse than that of the American FDA in five of the last six years studied (2004 to 2009).
- Only a small percentage of the new drugs that Health Canada certifies as safe and effective are finally declared eligible for reimbursement under provincial public drug programs.
- The provincial governments take a significant amount of time to approve the few drugs that they declare eligible for public reimbursement.
- Private drug insurance in Canada covers significantly more new drugs than public drug insurance.
- Private drug insurance in Canada covers new drugs more rapidly than public drug insurance.

Policy options—improving access to new drugs

Mutual recognition of drug approvals and cooperation with other jurisdictions

Health Canada essentially duplicates the new drug approval process of the FDA in the United States. Canada could speed up its regulatory process by taking advantage of the regulatory knowledge and capacity of other jurisdictions, rather than attempting to duplicate the American process. A consolidation of resources through the sharing of data, workload, and processes would be of great benefit to all participating countries. For example, if Canada entered into agreements of “mutual recognition” with other countries, new medications already approved in those countries could be introduced into the Canadian market far more rapidly and vice versa. In an effort to reduce the time taken to review new medications, Canada’s recent Smart Regulation strategy proposed a form of mutual recognition to reduce persistent delays in the drug approval process (EACSR, 2004).

Similar thinking is reflected in the International Conference on Harmonization of Technical Requirements for Registration of Pharmaceuticals for Human Use (ICH). In the 1980s, the European Community (the predecessor of the European Union) initiated discussions to develop a single market for pharmaceuticals. During this time, bilateral discussions between Europe, Japan, and the United States (representing over 80% of the world’s pharmaceutical market) were also taking place about harmonizing the approval process for new medicines. Although the regulatory agencies of Europe, Japan, and the United States all had the same central objective of evaluating the quality, efficacy, and safety of new medicinal products, they found it necessary to duplicate many expensive and time-consuming tests before granting market authorization in their respective countries. However, this became inefficient as the cost of research and development (for new drugs) and health care costs in general increased significantly over time, and patients did not have access to the newest medicinal products that were available in other countries (ICH, 2009). Thus, the intention of the international conference on harmonization (ICH) was to establish international technical requirements and guidelines for increasing the efficiency of the drug development process by reducing unnecessary duplications (thus reducing costs), while also accelerating the market approval so that new medicinal products were made available to patients as soon as possible (ICH, 2009).

International Conference on Harmonization of Technical Requirements for Registration of Pharmaceuticals for Human Use

The ICH is made up of six parties representing industry associations (brand-name drug companies only) and regulatory agencies of the United States, Japan, and Europe; and Observers, which include the European Free Trade Association (EFTA), Health Canada, and the World Health Organization (WHO). Although the observers do not vote on issues, they are present at all conferences and contribute to regulatory consultations. In addition, the Observers act as a link to non-ICH countries and regions (ICH, 2009).

Since its inception, the ICH has developed over 50 harmonized guidelines. The guidelines are intended to eliminate duplication in the drug development and marketing approval process, with the goal that a single set of studies can be produced to show the “quality, safety, and efficacy of a new medicinal product” (ICH, 2009). For instance, under the guidelines, a Common Technical Document (CTD) has been established so that a common application is used for medicinal product submissions to all member regulatory authorities (ICH, 2009).

Importantly, the guidelines are meant to be followed within the standards determined by regional requirements. In general, the guidelines are used by the drug industry as a way of reducing duplication by using a single set of data and universal application to show safety and efficacy, and to apply for licensing (ICH, 2009). ICH guidelines range from the amount of animal testing required during clinical trials to post-marketing safety data.

Although the ICH reduces duplication and costs, a drug must still be approved by the regulatory agency of each member and observer country. In other words, a drug approved by the EMEA (in the European Union) must still be submitted for approval to the FDA if a drug manufacturer would like the drug sold in the United States.

Although Health Canada is an Observer at the International Conference on Harmonization (ICH) and has implemented a number of guidelines established by the ICH, it still lags behind its international counterparts on harmonization efforts.

Replace government drug programs with subsidized access to private insurance

Data presented in this study indicate that private drug insurance in Canada tends to cover a wider range of new medicines and approves their coverage at a much faster rate than public drugs programs. One way to improve access to new medicines without increasing the burden on taxpayers would be to replace existing public drug plans with a properly regulated and competitive private-sector insurance market in which universal access to catastrophic

drug insurance would be facilitated through means-tested subsidies for those with low incomes. Economic theory and evidence, and actual Canadian experience, suggest that such a policy alternative would be expected to achieve universal access to prescription drug coverage and would contain costs, without restricting consumer choice through central planning.

Research suggests that private-payment health systems (a combination of private insurance and out-of-pocket spending) are better structured to encourage the efficient demand for, and supply of, health technology (cf. Danzon, 1993; Newhouse and the Insurance Experiment Group, 1993). By creating a price at the point of consumption, co-payments encourage patients to make cost-efficient choices between alternative treatments (e.g., invasive surgery, non-invasive surgery, prescription drugs, natural remedies). Consumer sensitivity to prices in turn creates incentives for health-care providers to supply and use resources efficiently. This creates incentives for drug manufacturers to invest efficiently in the development of new drugs.

It is also common for private-sector insurers to employ deductibles that appropriately restrict insurance coverage to a range of expenses considered individually unaffordable for consumers. Private-sector insurers sometimes impose annual coverage limits that might expose patients to significant cash costs in unusual cases involving very expensive drugs. Yet, in a competitive private-sector insurance market where individuals buy insurance directly, patients who prefer higher insurance coverage limits can opt to pay higher premiums to cover the risk of such extraordinary expenses. Under a system with means-tested subsidies for those with low incomes, maximum coverage limits for subsidized populations would have to be determined through public decision-making processes.

Importantly, it is essential that recipients be means-tested before qualifying for public subsidies. A historic feature of provincial drug-benefit programs in Canada is eligibility for benefits based on age (Graham and Tabler, 2005). Although some provinces have introduced means-testing in accordance with age-based eligibility, other provinces grant automatic eligibility for publicly funded drug programs once their citizens turn 65 years of age. For instance, in Ontario, seniors with a valid Ontario health card do not need to apply for publicly funded drug coverage: residents of Ontario aged 65 and older simply take their prescriptions to a pharmacy and inform the pharmacist that they are eligible for the Ontario Drug Benefit Program [ODB] (Ministry of Health and Long-Term Care, 2011). Even though the ODB requires seniors to contribute through minimal co-payments (a maximum of \$6.11 and a minimum of \$2 per prescription) and annual deductibles (a maximum of \$100 per person for a couple with a combined income of \$24,175 or more), research shows that very few seniors (and the entire population more generally) actually experience catastrophic drug costs or lack the financial means to pay for it themselves. Between 1997 and 2002, only 3% of Canadian

households spent more than 5% of their annual income on prescription drugs (Skinner, 2005). Likewise, the Romanow Commission on the Future of Health Care in Canada concluded that, in 2002, only 3% of the general population in the province of Manitoba exceeded the catastrophic threshold of \$1,500 (Romanow, 2002). Looking at seniors more specifically, a more recent analysis of the province of Saskatchewan shows that, in 2006, elderly families (65 years of age or older) only spent 1.4% of their median after-tax income on prescription drugs (Rovere, 2008). In other words, a very small percentage of seniors (or the general population) actually experience catastrophic drug costs.

Therefore, instead of automatically providing comprehensive public drug insurance to people based on age, subsidies should be provided to those shown by means-testing to have low incomes, regardless of age, for the purchase of catastrophic drug insurance in a private, competitive, insurance market. This would benefit recipients by giving them the choice of selecting the drug plan that best meets their individual medical needs while providing significant savings to taxpayers. Research shows that this approach could save taxpayers more than CA\$4 billion (2005 dollars) annually (Skinner, 2005). Allowing the private insurance market to compete through price and service, thus eliminating government monopolies on drug prices and coverage (Skinner and Rovere, 2008b) is the best policy choice for improving access to the newest prescription drugs.

Appendix—classes, data sources, and comparability

Data sources and comparability issues

There are four main sources of data cited in this report. The first source is Health Canada, which is the only source of data on drug-safety approval times in Canada that comprehensively includes all drugs.¹ Health Canada publishes data on pharmaceutical medicines through the Therapeutic Products Directorate (TPD) and on biologic medicines through the Biologics and Genetic Therapies Directorate (BGTD). Data published in annual reports on drug approvals by the TPD and the BGTD are stated in aggregates and are not broken down in detail. Health Canada publishes this data separately by drug submission class, priority (or “fast track”) review status, and therapeutic category. Health Canada’s published approval times include the entire period between the original filing of the new drug submission application (CR) and the issuance of the Notice of Compliance (NOC), inclusive of all company time spent to address any deficiencies in the manufacturer’s application. It is unclear whether Health Canada records the filing of a new drug-submission application on the actual date it was delivered to the TPD or the date on which a reviewer first saw the file (Health Canada, 2001, 2003, 2004, 2005a, 2005b, 2006a, 2006b, 2006c, 2007, 2008, 2009, 2010).

The two sources of international comparative data on drug safety approval times cited are the United States Department of Health and Human Services, Food and Drug Administration (US FDA, 1996, 2002, 2009a) and the European Medicines Agency (EMA, 2005, 2007, 2008, 2009, 2010). The FDA and the EMA publish separate data for the time spent by companies to correct the deficiencies in their applications. Health Canada does not do so; instead, it publishes an entire approval delay that includes what they call “company” time. In order to make the data comparable among countries, “company” time was included in the total approval delay for the FDA and the EMA.

1 Another public source of aggregated Canadian and international data on drug approval times is the industry association, R_x&D, which represents the makers of new drugs otherwise known as brand-name pharmaceutical companies. R_x&D conducts an annual survey of its member companies (representing most but not all of the industry) to collect data on their actual experience with government approval times for a defined basket of drug products (i.e., new drug submissions, supplemental drug submissions, and clinical trial applications) (Canada’s Research-Based Pharmaceutical Companies, 2005).

In previous years, Health Canada published both average and median figures for drug approval wait times. However, in this year's annual reports, Health Canada published only median figures. A special data request was made to Health Canada to obtain average approval times in order to compare wait times between Canada and the European Union. The FDA only publishes median figures. The EMEA only publishes average figures. As a result, Canadian and European data were compared using averages, while Canadian and American data were compared using medians. Unlike Health Canada and the FDA, the EMEA does not publish approval wait-time data that separates priority and non-priority new drug submissions.

In the US data, drug types (pharmaceutical and biological medicines) are aggregated but the data is separated by submission status type (priority or non-priority review). The Canadian figures published by Health Canada are separated according to submission status type (priority or non-priority review); however, unlike the American data, the Canadian figures are reported separately by drug type. In order to make the two sets of data more comparable, it was necessary to aggregate the separately reported medians by calculating a weighted median proportional to the number of drugs approved in each subset as a percentage of the total number of drugs approved overall. The Health Canada data is weighted by drug type (biological and pharmaceutical drugs) and by submission status type (priority and non-priority). As drug types are already consolidated by the FDA, the US data is only weighted by submission status type.

The fourth main source of data cited in this paper is Brogan Inc. (Brogan Inc., 2011). Brogan Inc. is a private consulting and data firm that collects information that permits the measurement of public and private reimbursement delays and the rate of positive reimbursement approvals in each of the provinces. Brogan Inc.'s database contains the date on which Health Canada issued a NOC for each new drug and the first date on which public reimbursement of a drug was approved in each of the provinces, as well as a classification of whether reimbursement was full, restricted, or declined. The database also provides the first date on which a paid claim for a new drug was registered for private insurers; however it does not provide the name of the private insurer. Using this database, comparisons can be measured between the date on which the private and public drug insurance plans approve a drug for reimbursement after it has received market authorization by Health Canada.

Canadian and international definitions of classes for new drug submissions

In Canada, new drugs fall under different classifications defined by Health Canada's Therapeutic Products Directorate (TPD) and the Biologics and Genetic Therapies Directorate (BGTD). In Canada, non-generic new drug approvals involve new active substances (NAS), new drug submissions (NDS),

and supplemental new drug submissions (SNDS). Similar classifications are used by the European Medicines Agency (EMA) and the US Food and Drug Administration (FDA) but under different terminology. The Canadian and international classifications are briefly described in tables 6 and 7.

Table 6: Classes of new drug submissions used by Health Canada's Therapeutic Products Directorate (TPD) and the Biologics and Genetic Therapies Directorate (BGTD)

New Active Substance (NAS)

A New Active Substance is a therapeutic substance that has never before been approved for marketing in any form; a chemical or biological substance not previously approved for sale in Canada as a drug; an isomer, derivative, or salt of a chemical substance previously approved for sale as a drug in Canada but differing in properties with regard to safety and efficacy; and a biological substance previously approved for sale in Canada as a drug but differing in molecular structure, nature of the source material, or manufacturing process.

New Drug Submission (NDS)

New Drug Submission includes all NASs, as well as combinations of previously approved NASs, and any drug that has not been sold in Canada for sufficient time and in sufficient quantity to establish its safety and effectiveness under use or its recommended conditions for use.

Supplemental NDS (SNDS)

A Supplemental NDS (SNDS) must be filed by the manufacturer if certain changes are made to products that have already been authorized. Such changes might include the dosage form or strength of the drug product, the formulation, method of manufacture, labeling, or recommended route of administration. An SNDS must also be submitted if a manufacturer wants to expand the indications (claims or conditions of use) for the drug product.

Abbreviated NDS (ANDS)

An Abbreviated NDS (ANDS) must be filed by a manufacturer wishing approval of a substance that is not a new drug but a generic "copy" of a drug that has been previously approved for sale in Canada.

Priority or Non-Priority review status

Priority review status is a "fast-track" status granted to eligible new drug submissions for human use, following review and approval of a request submitted by the manufacturer of the drug. Priority review status assigns eligible submissions a shortened review target of 180 days, in comparison to 300 days for submissions classed as non-priority. Health Canada believes it is in the best interest of Canadians to review potentially life-saving drugs as early as possible. Priority review status may be granted to drug submissions intended for the treatment, prevention, or diagnosis of serious, life-threatening, or severely debilitating illnesses or conditions where (a) there is no existing drug on the Canadian market with the same profile, or (b) the new product has a benefit/risk profile that is a significant improvement over the profile of existing products.

Source: Health Canada, 2006a

Table 7: Classifications of new drug applications (NDA) used by the FDA's Center for Drug Evaluation and Research (CDER)

New Molecular Entity (NME)

A New Molecular Entity is an active ingredient that has never before been marketed in the United States in any form.

New Drug Application (NDA)

When the sponsor of a new drug believes that enough evidence on the drug's safety and effectiveness has been obtained to meet FDA's requirements for marketing approval, the sponsor submits to FDA a new drug application (NDA). The application must contain data from specific technical viewpoints for review, including chemistry, pharmacology, medical, biopharmaceutics, and statistics. If the NDA is approved, the product may be marketed in the United States. For internal tracking purposes, all NDA's are assigned an NDA number.

Supplement

A supplement is an application to allow a company to make changes in a product that already has an approved new drug application (NDA). CDER must approve all important NDA changes (in packaging or ingredients, for instance) to ensure the conditions originally set for the product are still met.

Abbreviated New Drug Application (ANDA) Number

This six-digit number is assigned by FDA staff to each application for approval to market a generic drug in the United States.

Biologic License Application (BLA)

Biological products are approved for marketing under the provisions of the Public Health Service (PHS) Act. The Act requires a firm that manufactures a biologic for sale in interstate commerce to hold a license for the product. A biologics license application is a submission that contains specific information on the manufacturing processes, chemistry, pharmacology, clinical pharmacology, and the medical affects of the biologic product. If the information provided meets FDA requirements, the application is approved and a license is issued allowing the firm to market the product.

Review Priority Classification

The Review Priority Classification is a determination that is made based on an estimate of the therapeutic preventive or diagnostic value of the drug submitted. The designations "Priority" (P) and "Standard" (S) are mutually exclusive. Both original NDAs and effectiveness supplements receive a review priority classification but manufacturing supplements do not.

Priority review (P)

Priority review is granted when a drug product, if approved, would be a significant improvement over marketed products in the treatment, diagnosis, or prevention of a disease. Improvement can be demonstrated by, for example, (1) evidence of increased effectiveness in treatment, prevention, or diagnosis of disease; (2) elimination or substantial reduction of a treatment-limiting drug reaction; (3) documented enhancement of patient compliance; or (4) evidence of safety and effectiveness in a new subpopulation.

Standard review (S)

All non-priority applications will be considered standard applications.

Source: US FDA, 1996, 2009b.

The Center for Biologics Evaluation and Research's definition of priority review

The Center for Biologics Evaluation and Research (CBER) definition of a priority review is stricter than the definition that CDER uses (table 8). The biological drug, if approved, must offer a significant improvement in the safety or effectiveness of the treatment, diagnosis, or prevention of a serious or life threatening disease.

Table 8: Classifications of new drug market authorization applications by the European Medicines Agency (EMA)

New Active Substance (NAS)

A new chemical, biological, or radiopharmaceutical active substance includes:

- a chemical, biological, or radiopharmaceutical substance not previously authorized as a medicinal product in the European Union;
- an isomer, mixture of isomers, a complex or derivative or salt of a chemical substance previously authorized as a medicinal product in the European Union but differing in properties with regard to safety and efficacy from that chemical substance previously authorized;
- a biological substance previously authorized as a medicinal product in the European Union but differing in molecular structure, nature of the source material, or manufacturing process;
- a radiopharmaceutical substance, which is a radionuclide or a ligand, not previously authorized as a medicinal product in the European Union, or the coupling mechanism to link the molecule and the radionuclide that has not been authorized previously in the European Union.

Extensions

An extension of a new drug is defined according to the following:

- different salt/ester complex/derivative (with the same therapeutic moiety): evidence that there is no change in the pharmacokinetics of the moiety, pharmacodynamics, and/or in toxicity that could change the safety/efficacy profile (otherwise, to be considered as a new active substance);
- different route/pharmaceutical form (for parenteral administration, it is necessary to distinguish between intraarterial, intravenous, intramuscular, subcutaneous, and other routes): (i) new route of administration; (ii) new pharmaceutical form (same route);
- different strength, same route/pharmaceutical form and posology: bioavailability (c.f. guideline)
- suprabioavailable products: (i) same dosage intervals but reduced doses intended to achieve same plasma/blood concentrations as a function of time; bioavailability studies may suffice (see paragraph 5 of Bioequivalence guideline);
- active substances associated in a different proportion/different posology or if one or more is intended for modified release.

Source: European Medicines Agency, 2005

References

Adams, Christopher P., and Van V. Brantner (2003). New Drug Development: Estimating Entry from Human Clinical Trials. FTC Working Paper No. 262. Federal Trade Commission.

Adams, Christopher P., and Van V. Brantner (2006). Estimating the Cost of New Drug Development: Is It Really \$802 Million? *Health Affairs* 25, 2: 420–28.

Brogan Inc. (2011). Special data request by authors.

Canada's Research-Based Pharmaceutical Companies (2005). *Rx&D 2005 NOC Survey: Results and Key Messages. Canada's Research-Based Pharmaceutical Companies.*

Clever, Linda Hawes, et al. (1997). Additional Statements from the International Committee of Medical Journal Editors. *Canadian Medical Association Journal* 156, 4: 571–74.

Danzon, P.M. (1993). Health Care. *Concise Encyclopedia of Economics*. The Library of Economics and Liberty. <<http://www.econlib.org/library/enc/HealthCareIndustry.html>>.

Davidoff, Frank, et al. (2001). Sponsorship, Authorship and Accountability. *Canadian Medical Association Journal* 165, 6: 786–87.

DiMasi, J.A. (2001). Risks in New Drug Development: Approval Success Rates for Investigational Drugs. *Clinical Pharmacology and Therapeutics* 69, 5 (May): 297–307.

DiMasi, J.A., R.W. Hansen, and H.G. Grabowski (2003). The Price of Innovation: New Estimates of Drug Development Costs. *Journal of Health Economics* 22, 2: 151–85.

DiMasi, J.A., R.W. Hansen, H.G. Grabowski, and L. Lasagna (1995). Research and Development Costs for New Drugs by Therapeutic Category: A Study of the US Pharmaceutical Industry. *PharmacoEconomics* 7, 2: 152–69.

European Medicines Agency [EMA] (2005). *The Rules Governing Medicinal Products in the European Community: Volume 2a, Procedures for Marketing Authorization, Chapter 1 Marketing Authorisation* (November). European Commission Enterprise Directorate-General, Consumer Goods, Pharmaceuticals.

European Medicines Agency [EMA] (2007). *Annual Report of the European Medicines Agency 2006*. EMA. <http://www.emea.europa.eu/pdfs/general/direct/emeaar/EMA_Annual_Report_2006_full.pdf>.

European Medicines Agency [EMA] (2008). *Annual Report of the European Medicines Agency 2007*. EMA. <<http://www.emea.europa.eu/pdfs/general/direct/emeaar/AnnualReport2007.pdf>>.

European Medicines Agency [EMA] (2009). *Annual Report of the European Medicines Agency 2008*. EMA. <<http://www.ema.europa.eu/pdfs/general/direct/emeaar/AnnualReport2008.pdf>>.

European Medicines Agency [EMA] (2010). *Annual Report of the European Medicines Agency 2009*. EMA. <http://www.ema.europa.eu/docs/en_GB/document_library/Annual_report/2010/05/WC500090712.pdf>.

External Advisory Committee on Smart Regulation [EACSR] (2004). *Smart Regulation: A Regulatory Strategy for Canada*. Report to the Government of Canada (September). <<http://www.regulatoryreform.com/pdfs/Canada%20Smart%20Regulation%20Report%20Sept%202004.pdf>>.

Food and Drugs Act, R.S.C. 1985, c. F-27. <<http://laws.justice.gc.ca/en/F-27/index.html>>. Last updated March 1, 2010.

Graham, John R. (2005a). *A Lethal Guardian: The Canadian Government's Ban on Prescription Drugs*. Fraser Institute Digital Publication. Fraser Institute.

Graham, John R. (2005b). Approving New Medicines in Canada: Health Canada Needs a Dose of Competition. *Fraser Forum* (June): 9–11.

Graham, John R., and T. Tabler (2005). *Canadian Pharmacare: Performance, Incentives, and Insurance*. Fraser Institute Digital Publication. Fraser Institute.

Health Canada (2001). *How Drugs Are Reviewed in Canada*. Health Products and Food Branch, Therapeutic Products Directorate. <http://www.hc-sc.gc.ca/dhp-mps/prodpharma/activit/fs-fi/reviewfs_examenfd_e.html>.

Health Canada (2002). *Special Access Programme – Drugs, Drugs and Health Products*. Government of Canada.

Health Canada (2003). *Therapeutic Products Directorate (TPD) – 2003 Annual Submission Performance Report—Part I*. Government of Canada.

Health Canada (2004). *Therapeutic Products Directorate – 2004 Annual Submission Performance Report – Part I; Biologics and Genetic Therapeutics Directorate – 2004 Annual Submission Performance Report – Part II*. Government of Canada.

Health Canada (2005a). *Therapeutic Products Directorate (TPD) – 2005 Annual Submission Performance Report – Part I; Biologics and Genetic Therapeutics Directorate – 2005 Annual Submission Performance Report – Part II*. Government of Canada.

Health Canada (2005b). *Regulatory Review of Pharmaceuticals, Biologics and Medical Devices: 2005 Annual Summary of Performance*. <http://www.hc-sc.gc.ca/ahc-asc/pubs/hpfb-dgpsa/performance_rendement_2005_e.html>. Last updated July 25, 2006.

Health Canada (2006a). *Access to Therapeutic Products: The Regulatory Process in Canada*. Health Canada, Health Products and Food Branch. Government of Canada.

Health Canada (2006b). *2005 Annual Drug Submission Performance Report: Part I Therapeutic Products Directorate (TPD); Part II Biologics and Genetic Therapies Directorate (BGTD)*. Health Canada, Health Products and Food Branch.

Health Canada (2006c). *Priority Review of Drug Submissions*. Health Canada, Health Products and Food Branch: Therapeutic Products Directorate.

Health Canada (2007). *2006 Annual Drug Submission Performance Report: Part I Therapeutic Products Directorate (TPD); Part II Biologics and Genetic Therapies Directorate (BGTD)*. Health Canada, Health Products and Food Branch.

Health Canada (2008a). *2007 Annual Drug Submission Performance Report: Part I Therapeutic Products Directorate (TPD); Part II Biologics and Genetic Therapies Directorate (BGTD)*. Health Canada, Health Products and Food Branch.

Health Canada (2008b). Special Data Request. Detailed drug product data matching the Brogan Inc. (2007) dataset, which was used to measure provincial reimbursement delays and rates.

Health Canada (2009a). *2007 Annual Drug Submission Performance Report: Part I Therapeutic Products Directorate (TPD); Part II Biologics and Genetic Therapies Directorate (BGTD)*. Health Canada, Health Products and Food Branch.

Health Canada (2009b). Special Data Request. Detailed drug product data matching the Brogan Inc. (2008) dataset, which was used to measure provincial reimbursement delays and rates.

Health Canada (2010). *2009 Annual Drug Submission Performance Report: Part I Therapeutic Products Directorate (TPD); Part II Biologics and Genetic Therapies Directorate (BGTD)*. Health Canada, Health Products and Food Branch.

Health Canada (2011). Special Data Request. Detailed drug product data matching the Brogan Inc. (2009) dataset, which was used to measure provincial reimbursement delays and rates.

International Conference on Harmonization of Technical Requirements for Registration of Pharmaceuticals for Human Use [ICH] (2009). *History and Future of ICH*.

Ministry of Health and Long-Term Care (2011). *Ontario Drug Benefit Program*. Publicly Funded Drug Programs. Government of Ontario.

Newhouse, J.P., and the Insurance Experiment Group (1993). *Free For All? Lessons from the RAND Health Insurance Experiment*. RAND. Harvard University Press.

Romanow, Roy (2002). *Building on Values: The Future of Health Care in Canada – Final Report*. Commission on the Future of Health Care in Canada. Government of Canada.

Rovere, Mark (2008). Subsidization in Saskatchewan: Drug Cost Coverage Should Be Means Tested, Not Aged-Based. *Fraser Forum* (June). Fraser Institute.

Skinner, Brett J. (2005). *Universal Drug Benefits for Seniors: Unnecessary, Unsustainable, and Unfair*. Fraser Institute.

Skinner, Brett J. (2006, June 21). Sure, It's Cheap to Make Drugs. But the Cost of Discovering and Developing Them Is Enormous. *Globe and Mail*.

Skinner, Brett J., and Mark Rovere (2008a). *Access Delayed, Access Denied 2008: Waiting for New Medicines in Canada*. Fraser Institute.

Skinner, Brett J., and Mark Rovere (2008b). *Canada's Drug Price Paradox 2008*. Fraser Institute.

Skinner, Brett J., and Mark Rovere (2009). *Access Delayed, Access Denied 2009: Waiting for New Medicines in Canada*. Fraser Institute.

Skinner, Brett J., and Mark Rovere (2010). *Access Delayed, Access Denied 2010: Waiting for New Medicines in Canada*. Fraser Institute.

Skinner, Brett J., Mark Rovere, and Courtney Glen (2007). *Access Delayed, Access Denied: Waiting for Medicines in Canada*. Fraser Institute.

US Food and Drug Administration [FDA] (1996). *Manual of Policies and Procedures*. MAPP 6020.3. Center for Drug Evaluation and Research.

US Food and Drug Administration [FDA] (2002). *The FDA and the Drug Development Process: How the FDA Insures that Drugs Are Safe and Effective*. FDA Fact Sheet. FDA.

US Food and Drug Administration [FDA] (2009a). *New Drug Application (NDAs) & Biologic License Applications (BLAs)*. Center for Drug Evaluation and Research. <<http://www.fda.gov/downloads/Drugs/DevelopmentApprovalProcess/HowDrugsareDevelopedandApproved/DrugandBiologicApprovalReports/UCM123957.pdf>>.

US Food and Drug Administration [FDA] (2009b). *Drugs@FDA Glossary of Terms*. US Department of Health and Human Services. <<http://www.fda.gov/Drugs/InformationOnDrugs/ucm079436.htm>>. Last updated January 7, 2010.

US Food and Drug Administration [FDA] (2010). 2010 FDA Budget Summary. *FY 2010 Congressional Justification; Narrative by Activity, Human Drugs*. <<http://www.fda.gov/AboutFDA/ReportsManualsForms/Reports/BudgetReports/2010/default.htm>>.

World Medical Association [WMA] (1964). *World Medical Association Declaration of Helsinki: Ethical Principles for Medical Research Involving Human Subjects*.

About the authors

Mark Rovere

Mark Rovere is Associate Director of the Health Policy Research Centre at the Fraser Institute. He holds a B.A. (honours) and an M.A. in Political Science from the University of Windsor, and is currently a Ph.D. student in the Department of Health Policy, Management, and Evaluation at the University of Toronto. Since joining the Institute, Mr Rovere has co-authored numerous studies on a range of health and pharmaceutical policy issues including Canadian pharmaceutical pricing, access to new medicines, government drug expenditures, Canadian and American prescription drug spending, and the sustainability of public health care in Canada. His recent commentaries have appeared in such newspapers as the *Financial Post*, *Calgary Herald*, *Halifax Chronicle Herald*, and *Toronto Sun*. Mr Rovere has also written regularly for *Fraser Forum* on a variety of topics related to health and pharmaceutical policy.

Brett J. Skinner

Brett J. Skinner is the Fraser Institute's President as well as Director of Health Policy and Insurance Policy research. He holds a B.A. from the University of Windsor, an M.A. through joint studies between the University of Windsor and Wayne State University in Detroit (Michigan), and a Ph.D. from the University of Western Ontario, where he has lectured in both the Faculty of Health Sciences and the Department of Political Science. He has also worked as a research consultant to the Insurance Bureau of Canada (Toronto). Since 2002, Dr. Skinner has authored or co-authored nearly 40 major original pieces of applied economics and public policy research. In 2003, he was a co-winner of the Atlas Economic Research Foundation's Sir Antony Fisher Memorial Award for innovative projects in public policy. His 2009 book, *Canadian Health Policy Failures: What's Wrong? Who Gets Hurt? Why Nothing Changes*, was also a finalist for the Atlas-Fisher award. His research has been published through several think-tanks including the Fraser Institute, the Atlantic Institute for Market Studies (Halifax) and the Pacific Research Institute (San Francisco). His work has also been published in several academic journals including *Economic Affairs*, *Pharmacoeconomics*, and *Alimentary Pharmacology & Therapeutics*. Dr. Skinner is frequently cited by Canadian, American, and global media. He has presented his research at conferences and events around the world, including twice testifying before the House of Commons Standing Committee on Health in Ottawa, and twice briefing bi-partisan Congressional policy staff at the US Capitol in Washington, DC.

Disclosure

Because the authors' employer receives charitable donations from research-based pharmaceutical manufacturers, the authors have chosen to disclose financial relationships in accordance with the policies of the International Committee of Medical Journal Editors (Clever et al., 1997; Davidoff et al., 2001). The authors acknowledge with sincere gratitude those who financially support the Fraser Institute and this research including research-based pharmaceutical companies (whose contributions make up less than 5% of the Fraser Institute's budget), as well as the general membership and other supporters of the Institute. With respect to this manuscript, no drug-maker or other donor had any input into the collection, analysis, or interpretation of the research, nor in the manuscript's writing. Nor did any drug-maker or other donor preview this manuscript before publication. The Fraser Institute accepts no government funding and no private contracts for research. The donations we receive are unrestricted and come only from private foundations, organizations, or individuals.

Publishing information

Periodically, the Fraser Institute publishes timely and comprehensive studies of current issues in economics and public policy. This study is one such example belonging to a series of related publications.

Distribution

These publications are available from <http://www.fraserinstitute.org> in Portable Document Format (PDF) and can be read with Adobe Acrobat® 7 or later or with Adobe Reader® 7 or later. Adobe Reader® X, the most recent version, is available free of charge from Adobe Systems Inc. and may be down-loaded from: <http://get.adobe.com/reader/>. We encourage you to install the most recent version. Readers who have trouble viewing or printing our PDF files using applications from other manufacturers (e.g., Apple's Preview) should install and use Reader® or Acrobat®.

Ordering publications

For information about ordering the printed publications of the Fraser Institute, please contact the publications coordinator

- e-mail: sales@fraserinstitute.org
- telephone: 604.688.0221 ext. 580 or, toll free, 1.800.665.3558 ext. 580
- fax: 604.688.8539.

Media

For media inquiries, please contact our Communications Department

- 604.714.4582
- e-mail: communications@fraserinstitute.org.

Disclaimer

The authors of this publication have worked independently and opinions expressed by them are, therefore, their own, and do not necessarily reflect the opinions of the supporters, trustees, or other staff of the Fraser Institute. This publication in no way implies that the Fraser Institute, its trustees, or staff are in favor of, or oppose the passage of, any bill; or that they support or oppose any particular political party or candidate.

Copyright

Copyright© 2010 by the Fraser Institute. All rights reserved. No part of this publication may be reproduced in any manner whatsoever without written permission except in the case of brief passages quoted in critical articles and reviews.

ISSN

ISSN 1918-2090 Studies in Health Policy

Date of issue

June 2011

Citation

Rovere, Mark, and Dr. Brett J. Skinner (2011). *Access Delayed, Access Denied: Waiting for New Medicines in Canada, 2011 Report*. Studies in Health Policy (June). Fraser Institute.

Cover design

Bill Ray

Images for cover

- © KHZ, Fotolia (“Blood Cells”)
- © Kristy Pargeter, Fotolia (“Heart Monitor”)
- © Robert Byron, iStockphoto (“Blood Sample”)
- © Emrah Turudu, iStockphoto (“Test Tube”)
- © Andrzej Tokarski, Fotolia (“X-Ray”)
- © Vasiliy Yakobchuk, iStockphoto (“Brain”)

Supporting the Fraser Institute

To learn how to support the Fraser Institute, please contact

- Development Department, Fraser Institute
Fourth Floor, 1770 Burrard Street
Vancouver, British Columbia, V6J 3G7 Canada
- telephone, toll-free: 1.800.665.3558 ext. 586
- e-mail: development@fraserinstitute.org.

About the Fraser Institute

Our vision is a free and prosperous world where individuals benefit from greater choice, competitive markets, and personal responsibility. Our mission is to measure, study, and communicate the impact of competitive markets and government interventions on the welfare of individuals.

Founded in 1974, we are an independent Canadian research and educational organization with locations throughout North America and international partners in over 70 countries. Our work is financed by tax-deductible contributions from thousands of individuals, organizations, and foundations. In order to protect its independence, the Institute does not accept grants from government or contracts for research.

Nous envisageons un monde libre et prospère, où chaque personne bénéficie d'un plus grand choix, de marchés concurrentiels et de responsabilités individuelles. Notre mission consiste à mesurer, à étudier et à communiquer l'effet des marchés concurrentiels et des interventions gouvernementales sur le bien-être des individus.

Peer review

Validating the accuracy of our research

The Fraser Institute maintains a rigorous peer review process for its research. New research, major research projects, and substantively modified research conducted by the Fraser Institute are reviewed by a minimum of one internal expert and two external experts. Reviewers are expected to have a recognized expertise in the topic area being addressed. Whenever possible, external review is a blind process.

Commentaries and conference papers are reviewed by internal experts. Updates to previously reviewed research or new editions of previously reviewed research are not reviewed unless the update includes substantive or material changes in the methodology.

The review process is overseen by the directors of the Institute's research departments who are responsible for ensuring all research published by the Institute passes through the appropriate peer review. If a dispute about the recommendations of the reviewers should arise during the Institute's peer review process, the Institute has an Editorial Advisory Board, a panel of scholars from Canada, the United States, and Europe to whom it can turn for help in resolving the dispute.

Editorial Advisory Board

Members

Prof. Armen Alchian	Prof. Jack L. Granatstein
Prof. Terry Anderson	Prof. Herbert G. Grubel
Prof. Robert Barro	Prof. James Gwartney
Prof. Michael Bliss	Prof. Ronald W. Jones
Prof. James M. Buchanan†	Dr. Jerry Jordan
Prof. Jean-Pierre Centi	Prof. Ross McKittrick
Prof. John Chant	Prof. Michael Parkin
Prof. Bev Dahlby	Prof. Friedrich Schneider
Prof. Erwin Diewert	Prof. L.B. Smith
Prof. Stephen Easton	Mr. Vito Tanzi
Prof. J.C. Herbert Emery	Sir Alan Walters

Past members

Prof. Friedrich A. Hayek*†	Prof. George Stigler*†
Prof. H.G. Johnson*	Prof. Edwin G. West*
Prof. F.G. Pennance*	

* deceased

† Nobel Laureate