

Written Submission:
Bill C-64: An Act Respecting Pharmacare

Senate Standing Committee
Social Affairs, Science and Technology

By:
Food Allergy Canada

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Ensuring access to essential medication

Food Allergy Canada welcomes the federal government's efforts towards providing greater access to essential medications for all Canadian families under a National Pharmacare Program. As the national advocacy and education organization for more than 3 million Canadians, including 600,000 children¹, impacted by food allergy, we are acutely aware of the role government can play in supporting individuals with food allergy and their families. We encourage measures to provide accessible and affordable medication to Canadian families, including epinephrine auto-injectors, life-saving devices used to treat severe allergic reactions and anaphylaxis.

Our request

Epinephrine is the first line treatment of anaphylaxis, a serious potentially life threatening allergic reaction². Given this, **we request that epinephrine auto-injectors (e.g. EpiPen®, Allerject®) are included among the first lists of essential medicines in the national formulary under the proposed National Pharmacare Program.**

Currently, epinephrine is recognized both domestically and globally as an essential medication, setting precedence for its importance as lifesaving medication. Epinephrine auto-injectors are included within each provincial formulary, allowing access to Canadians across the country. Epinephrine is also recognized by the [World Health Organization's Model List of Essential Medicines](#) and the [CLEAN Meds](#) list of St. Michael's Hospital in Toronto, two lists which have been suggested be used by the [Advisory Council](#) on the Implementation of National Pharmacare. Given the widespread acknowledgment of epinephrine as an essential medication, we urge the government to ensure epinephrine auto-injectors are available for all Canadian at-risk.

Epinephrine auto-injectors are essential for the management of food allergy

There is no cure for food allergy. Most individuals manage their food allergy through strict avoidance of the allergen. In the event of an unintended exposure, being prepared to treat a potentially life-threatening allergic reaction (anaphylaxis) with an epinephrine auto-injector is essential. Research has shown that the prompt administration of epinephrine within the first 30 minutes can result in better outcomes in a food allergic reaction^{3,4}, and that the early administration of epinephrine reduces the severity of symptoms. Given that delayed epinephrine treatment is associated with fatal outcomes⁵, it is essential that Canadians have access to easy-to-use devices to treat anaphylaxis promptly with epinephrine and not delay its use by waiting for paramedics or treatment in Emergency Departments.

Canadians at risk of anaphylaxis are advised by their physicians to carry epinephrine auto-injectors and use it promptly if anaphylaxis occurs. The auto-injectors have been designed to be

portable and easy to administer epinephrine, making it a format that can be used by the lay community such as parents, children, teachers, or other caregivers.

Epinephrine is also recommended as first line treatment for anaphylaxis triggered by insect stings, medication and latex, which affect thousands more Canadians.

Current barriers to access

Delay or failure to treat anaphylactic reactions occur because patients cannot access or afford epinephrine auto-injectors or are confused on the symptoms of reactions and when to act.

Key facts and research findings that highlight financial barriers to access include:

- Average out-of-pocket price of an epinephrine auto-injector ranges from \$100-\$150 per device, with an average expiry of 12-18months; it is recommended that those at risk carry at least two devices.
- Less than 50% of individuals with food allergy have access to an epinephrine auto-injector⁶
- Data points toward cost as a contributing factor to low carriage rates of epinephrine auto-injectors⁷
- Households may need to choose between food and medicine,^{8,9} the impact is likely greater for those managing food allergy.
- Epinephrine auto-injector costs may be contributing to sub-optimal management of food allergy¹⁰ by patients, including:
 - relying on auto-injectors that are past their expiration dates
 - not carrying an epinephrine auto-injector
 - choosing to use antihistamines or relying on emergency services over treating anaphylaxis with an epinephrine auto injector

Action is needed

We strongly believe that everyone who requires this potentially life-saving medication should have access to it.

Currently there is no cure for food allergy and there are very limited treatment options. Canadians at risk of an anaphylactic reaction must carry an epinephrine auto-injector with them at all times, in case of an emergency. These devices are their only means of treating a potentially life-threatening reaction prior to receiving any emergency medical care. For this community cost should not be a barrier to access and they should be confident in using their epinephrine auto-injector to treat a serious reaction, without worrying about the cost of replacing it.

Food Allergy Canada's approach to reducing the risk of allergic reactions in both children and adults is focused on self-management, community engagement, understanding, and respect.

We are pleased to work with government, industry, the medical community, and other key stakeholders to contribute to policies that will ensure affordable access to life saving medication for Canadians.

Jennifer Gerdts, Executive Director, Food Allergy Canada

About Food Allergy Canada

We are a national charity and the country's leading patient organization committed to educating, supporting, and advocating for the more than 3 million Canadians impacted by food allergy. We focus on improving daily quality of life by providing education and support needed to effectively navigate this medical condition, building informed and supportive communities, and acting as the national voice on key patient issues.

References

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