









Dear Provincial/Territorial Health ministry and Public Health Agency,

We are writing to you on behalf of the signatories listed at the bottom of this letter that represent a network of national patient organizations, in the oncology and other disease areas. The purpose of this letter is to bring to your attention a number of concerns described in detail below that these groups have regarding the management of the pandemic including the ongoing vaccine trials as well as the roll out of vaccines across Canada.

It is with great relief that we are learning about the amazing strides in research and development of vaccines at an extraordinary pace that may well prove safe, effective, and durable for people living in Canada. We are also following with great interest the evolving Recommendations for Use of COVID-19 vaccines by the National Advisory Committee on Immunization. We await with great anticipation the results of the various trials and final Health Canada approval. In the meantime, the decision to make the vaccines available on a conditional and prioritized basis is also welcomed.

We have also been following news of the implementation plans for roll out by the provinces /territories. We recognize the complexity of organizing such plans and appreciate the hard work and long hours that civil servants are spending across the country on this profoundly important endeavour.

These are important steps towards restoring the already overburdened healthcare systems' capacity to provide medical services to patients with other serious medical conditions including cancer. As you are well aware, these services have been severely curtailed and even halted entirely during the pandemic with profoundly adverse impacts for these patients.

We are very concerned with a number of key issues regarding COVID vaccine roll out that we wish to bring to your attention.

1. Dosing Schedule

There are reports that some provinces are considering delaying the second dose of the Pfizer-BioNTech and Moderna vaccines beyond the approved Health Canada indication of approximately 3-4 weeks, and in some cases, there is even discussion about doing away with the second dose entirely.

We note that the Health Canada Notice of Compliance with Conditions for the Pfizer BioNTech vaccine states that the directions for use are as follows: Pfizer-BioNTech COVID-19 Vaccine is administered intramuscularly after dilution as a series of two doses (0.3 mL each) 21 days apart. Moderna's dosage is based on a 28-day time interval.

Importantly, there are no other data available at this time that would support the use of the vaccines outside of the directions for use that were indicated by the manufacturer.

Recommendation 1: We urge the provincial government to ensure that vaccines are delivered as indicated for the safety of those receiving the vaccine and people living in Canada in general. We are deeply concerned that any deviation from the stated guidelines for vaccine administration might have serious consequences including partially or completely reducing its efficacy.

Please refer to the articles listed below supporting these concerns published in well regarded news media with quoting leading research and medical experts. ^{1,2,3}

Recommendation 2: We urge the provincial/territorial government to work with their federal counterparts to ensure that Canada's procurement plan will ensure adequate vaccine supply for all people who wish to be vaccinated in a timely manner.

Recommendation 3: We urge the provincial/territorial governments to act efficiently, safely, and effectively to distribute available vaccines.

2. Data Collection

We are unaware of pan-Canadian systems that have been developed for the ongoing collection of data including safety, efficacy, and duration of immunity on an individual and population(s) levels. These are imperative to determine numerous factors including future dosing schedules, population specific indications, population, and individual benefit/risk/uncertainty assessments.

Recommendation 4: Work with other provincial/territorial counterparts and with the federal government to develop and implement a pan-Canadian strategy and process for consistent, relevant data collection to ensure monitoring, evaluation and evidence-based course corrections are put in place as required.

¹ For mRNA vaccines, we should stick to the schedule | Coronavirus | The Guardian. https://www-theglobeandmail-com/amp/opinion/article-science-gave-us-excellent-vaccines-why-bend-the-rules/. Accessed January 13, 2021.

² Britain gambles on Covid-19 vaccines, upping the stakes for the rest of us. https://www.statnews.com/2021/01/04/britain-takes-a-gamble-with-covid-19-vaccines-upping-the-stakes-for-the-rest-of-us/. Accessed January 13, 2021.

³ Opinion: Science gave us excellent vaccines. Why bend the rules? - The Globe and Mail. https://www-theglobeandmail-com/amp/opinion/article-science-gave-us-excellent-vaccines-why-bend-the-rules/. Accessed January 13, 2021.

Recommendation 5: As follow-up data are being collected, we request that you urge Health Canada and the Public Health Agency of Canada to conduct head-to-head comparison studies between vaccines, and different dosing regimens for vaccines, on the basis of safety, efficacy, and durability overall and for specific populations and other relevant demographics. We urge your province/territory to support such trials with whatever data and data collection processes are required.

We look forward to your response at your earliest convenience.

Yours truly,

Kathleen Barnard, President and Founder, Save Your Skin Foundation
Martine Elias, Executive Director, Myeloma Canada
Eva Villalba, Executive Director, Coalition priorité cancer au Québec/Quebec Cancer Coalition
Antonella Scali, Executive Director, Canadian Psoriasis Network
CONECTed, a network of 8 National Cancer Groups including paediatric cancers