



Karen Hogan  
Auditor General of Canada

October 10, 2024

Re: Request for a performance audit into the Biologics Manufacturing Centre & Novavax vaccine procurement

Dear Ms. Hogan,

As the Co-Chair of the Canadian Covid Society, a non-profit organization formed to fight the acute and long-term sequelae of SARS-CoV2 (the virus that causes COVID-19), I am writing to express our concerns about the federal government's procurement and continued funding of the Biologics Manufacturing Centre (BMC) in Montreal, and its agreements with Novavax to produce vaccines in that facility.

As you may be aware, the publicly owned BMC was built on National Research Council-owned land with funding of nearly \$130 million from the federal government. While construction was mostly complete by June 2021, and the BMC was certified by Health Canada as compliant with its regulations in July 2022, the taxpayer-funded facility has not yet produced any vaccines for Canadians.

The lack of production at the BMC is having significant real-world consequences for Canadians as we head into another fall and winter with high levels of COVID-19 transmission. This is because the federal government has recently confirmed that it can only procure the updated Novavax COVID-19 vaccine via domestic production (i.e. from the BMC).

Although other countries have negotiated contracts that allow them to order the updated Novavax COVID-19 vaccine from other production sites, Canada reportedly has not done so. Instead, the Public Health Agency of Canada has stated that provincial and territorial governments may procure Novavax themselves. However, there is no indication that any of those governments have done so, as the cost is reportedly prohibitive for them, especially when compared with the bulk-buying power of the federal government.

The net result is that thousands of Canadians that are seeking the Novavax COVID-19 vaccine this fall may go without protection. The significance of this situation cannot be overstated because many intended Novavax recipients are unable to tolerate the mRNA

vaccine options (Moderna and Pfizer) due to their immunocompromised status, adverse reactions to previous mRNA vaccinations, or other health complications. To be clear, these are some of the most medically vulnerable Canadians. If the situation does not change, they will be left to fend for themselves while COVID-19 circulates at extremely high levels.

When the federal government's funding of the BMC was announced, Canadians were told that it would produce vaccines for them for decades to come. Given the multi-year delay in commencing production at the BMC, and the federal government's apparent decision not to adjust its Novavax procurement contract, it is possible that the current vaccine access gap may become a multi-year event. Again, this will affect thousands of vulnerable Canadians, potentially causing some to lose their lives, while many others may become disabled by long Covid or other viral sequelae.

Based upon the available information, it does not appear that the federal government is reasonably managing its activities, responsibilities and resources in the context of the BMC and the Novavax agreements. Therefore, we are asking you to consider launching a performance audit to examine the BMC procurement process and the federal government's agreements with Novavax for domestic vaccine production in that facility. We are hopeful that an independent, objective and systematic assessment of these issues will provide needed accountability and answers to Parliament and Canadians, including the vulnerable members of our society that are most at risk.

Thank you for your consideration of our concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Vipond', written in a cursive style.

Dr. Joe Vipond, Emergency physician  
MD, FCFP, CCFP(EM). B.Sc Hon.  
Co-Chair of the Canadian Covid Society