



**Neighbourhood  
Pharmacy**  
Association of Canada

Association canadienne  
**des pharmacies  
de quartier**

**Office of the Chief Executive Officer**

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September 10, 2020

Dr. Bonnie Henry  
Provincial Health Officer  
Office of the Provincial Health Officer  
PO Box 9648  
STN PROV GOVT  
Victoria, BC V8W 9P4

**RE: Illicit Drug Toxicity and Section 56 Exemption**

Dear Dr. Henry,

I want to begin by thanking you for your moral leadership in continuing to raise awareness of illicit drug toxicity deaths at a provincial and national level. As a healthcare practitioner representing a national network of healthcare practitioners, I want to say that all members of Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) are saddened and disappointed by the news that illicit drug toxicity deaths continue to be at record-high levels in British Columbia, and to know that it continues to be difficult for patients to access life-saving treatment options during the pandemic.

We would welcome the opportunity to speak with someone from your office about ways pharmacy can continue to use recent federal regulatory changes to support the work your team is doing to reduce the number of deaths related to the illicit drug toxicity crisis.

Neighbourhood Pharmacies is the respected voice and advocate for the business of pharmacy in British Columbia. We represent Canada's leading pharmacy organizations including chain, banner, long-term care, and specialty pharmacies, as well as grocery chains and mass merchandisers with pharmacies.

Our pharmacies are deeply embedded in and committed to everyone in the communities they serve, and our pharmacists are considered the primary providers of medication management services. Data confirms that patients see their pharmacist up to ten times more frequently than they see their primary care physician. We believe there is an opportunity for pharmacists to play a greater role in supporting the work you are doing to combat the illicit drug overdose crisis.

As you know, in response to the COVID-19 pandemic, Health Canada issued a short-term subsection 56(1) exemption from the *Controlled Drugs and Substances Act* that allows pharmacists to prescribe, sell, or provide controlled substances in limited circumstances, or transfer prescriptions for controlled substances. Our members have used this exemption to extend and renew OAT prescriptions, transfer prescriptions to other pharmacists, receive verbal prescriptions, and expand options for home delivery of prescriptions to patients.

We would like to discuss with your office the ways pharmacy can continue to make use of the subsection 56(1) exemption to support the provincial and federal governments' efforts to reduce the number of deaths as a result of the toxic illicit drug supply. Your voice is respected at the provincial and federal level, and we hope that you will support pharmacists in British Columbia and across the country in advocating for the federal government to extend this exemption permanently so pharmacists can continue to support patients in their communities even once the COVID-19 pandemic is over. A permanent federal solution will allow provinces like British Columbia to craft public health solutions that meet the unique needs of their citizens.

We understand that with the influenza season quickly approaching and students preparing to go back to school, this is a busy time for you. We would welcome the opportunity to discuss this issue with someone from your office at their convenience.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Hanna', with a stylized flourish at the end.

Sandra Hanna, RPh.  
Chief Executive Officer

cc: Dr. Martin Lavoie, Deputy Provincial Health Officer  
Dr. Brian Emerson, A/Deputy Provincial Health Officer  
Laurel Thompson, Executive Coordinator  
Alan Bruce, Correspondence and Administration Coordinator  
Kristin Wright, Correspondence and Administration Coordinator