



**Neighbourhood
Pharmacy**
Association of Canada

Association canadienne
**des pharmacies
de quartier**

Office of the Chief Executive Officer

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Ms. Michelle Boudreau
Director General, Controlled Substances Directorate
c/o Office of Legislative and Regulatory Affairs,
Health Canada
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RE: Notice of intent to develop new regulations under the *Controlled Drugs and Substances Act* with respect to supervised consumption sites and services

Dear Ms. Boudreau,

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies), welcomes the opportunity to provide input as Health Canada develops new regulations under the *Controlled Drugs and Substances Act* (CDSA) with respect to supervised consumption sites and services.

We applaud the government's commitment to ensure that Canada's response to the current opioid crisis is robust, well-coordinated and effective. Part of this response involves scaling up harm-reduction programs, such as supervised consumption sites (SCSs), however, equally important is providing supports to the users of such sites who are ready for treatment.

Safe consumption sites are an opportunity to help users who are ready for treatment. This means connecting them with healthcare professionals who can promptly initiate treatments such as Opioid Dependence Treatment (ODT). Improved access to treatments and medication management is in the interest of all Canadians. For patients prescribed safe supply or OAT, reliable access to prescription medication is a key part of successful and ongoing treatment. Gaps in therapy are very serious for patients and can have devastating consequences if patients seek alternatives through the illicit market.

Recently, the COVID-19 pandemic has prompted a policy revision which temporarily extends pharmacists the right to prescribe controlled substances under the CDSA, through a Subsection 56(1) class exemption (see attached CDSA_exemption 2020-03-19.pdf). The exemption allows pharmacists to ensure the best possible, uninterrupted care for Canadians at a difficult time by enabling them to prescribe, sell, or provide controlled substances in limited circumstances, or transfer prescriptions for controlled substances. Pharmacies and pharmacists 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 controlled substance prescriptions to patients.

As Health Canada considers CDSA regulatory changes for the purposes of optimizing the use and effectiveness of supervised consumption sites in harm reduction, it should also look to complementary amendments that enable health care professionals to mitigate harm through reliable treatment.

Pharmacists are well positioned to support patients in their communities, but the expiration of the current subsection 56(1) exemption will limit the ability of pharmacists to leverage their expertise and accessibility.

Neighbourhood Pharmacies recommends that Health Canada designate pharmacists as practitioners under the CDSA, which will have the effect of making the Subsection 56(1) exemption of March 19, 2020 permanent.

Inclusion of pharmacists under the CDSA definition of “practitioners” would allow pharmacists across the country to continue to support patients and their communities in fighting the toxic drug overdose crisis and other public health emergencies once the COVID-19 pandemic is over.

Neighbourhood Pharmacies represents Canada’s leading pharmacy organizations that deliver high value, quality care to Canadians in all models including chain, banner, long-term care, specialty and independent pharmacies as well as grocery chains and mass merchandisers with pharmacies. Our members are home to the most trusted providers of drug therapies, pharmacy-based patient services and innovative healthcare solutions. We advocate for community-based care through our members’ high accessibility and proven track record of providing optimal patient care closer to where patients live, work and play. By leveraging nearly 11,000 points of care with pharmacies conveniently located in every community across Canada, Neighbourhood Pharmacies aims to advance sustainable healthcare for all stakeholders.

Sincerely,



Sandra Hanna, RPh.
Chief Executive Officer