



**Neighbourhood
Pharmacy**
Association of Canada

Association canadienne
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Jeana Wendel
Registrar
Saskatchewan College of Pharmacy Professionals
1900 Albert Street, Suite 221A
Regina, SK S4P 4K8

Dear Jeana:

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) appreciates the opportunity to provide this Submission Brief regarding the Saskatchewan College of Pharmacy Professionals (SCCP) proposed Regulatory Bylaw Amendments to End the Storage and Sale of Exempted Codeine Products (ECPs).

The Saskatchewan College of Pharmacy Professionals (SCPP) is proposing regulatory bylaw amendments to end the storage and sale of Exempted Codeine Products (ecps) by licensed members. Firstly, we note that The Regulatory Bylaws of the SCPP, Part J outlines the “**conditions** of sale for drugs and related requirements for pharmacists, pharmacy technicians and pharmacies”, but that the term “drug” is defined in *The Pharmacy and Pharmacy Disciplines Act* s.2(h).

Despite the risks associated with ECPs, there are also several risks associated with the removal of these products from the market, including the following:

1. Potential diversion of patients to the illicit market

While a prohibition of ECPs may help to prevent the use of these products by new users, it may drive ongoing users to the illicit market if they cannot access these products through the legitimate and controlled supply chain. We saw similar impacts with the removal of OxyContin from the Canadian market, with patients being driven to alternative opioids once their drug of choice was no longer available¹. In some cases, patients were driven to alternative prescription opioids, but in many cases, they sought opioids through illicit channels. At a time when the opioid crisis is at its worse, we

¹ <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5667516/>

believe any solution that controls or limits access to opioids must have at its centre, a focus on harm reduction.

2. Risks associated with alternate therapy options

While there are risks associated with ECPs and their use should be limited to patients in which these risks are outweighed by the benefits, there are also risks associated with the alternatives. Removing ECPs from the market will have impacts not only on patients' self-management of pain, but also on healthcare utilization. In many cases, acetaminophen alone is not sufficient to reduce pain, and Non-Steroidal Anti-inflammatory Drugs are contra-indicated, and excessive use of the latter can lead to other adverse drug reactions including gastrointestinal ulcers, bleeding, perforation and acute renal failure². Physicians will be expected to prescribe more potent opioids, or straight opioids to replace ECPs that are no longer available to patients, thereby increasing the system costs through physician or hospital visits.

3. Inconsistency in regulations and product availability leading to confusion of the general public

Given that Health Canada is in the process of moving towards allowing ECPs to be sold via prescription only and granting authority to pharmacists to prescribe these products, and that Manitoba has already moved in this direction, we feel that making Saskatchewan an outlier in this space would lead to confusion of the general public. If ECPs are still available in other jurisdictions, it is likely that an illegitimate market for these products will grow and ECPs acquired in other jurisdictions will still make their way into Saskatchewan creating alternate mechanisms for patients to obtain ECPs, without the safeguards of the SPCP's Control Over Sales of Exempted Codeine Products Policy Statement.

Neighbourhood Pharmacies supports a two-pronged solution that more stringently manages patients' access to potentially harmful substances, but also mitigates the risk of diversion.

NEIGHBOURHOOD PHARMACIES KEY OBJECTIVES AND PRIORITIES FOR NEW CODEINE REGULATION CHANGES

- **Increased Monitoring of Patient Usage:** An increased and more efficient monitoring of all patients using all codeine products (through Narcotic Monitoring System).
- **Improved Tracking System of Opioids:** A more efficient system increasing the tracking and documentation of pharmacist and healthcare provider intervention in all transactions leading to the sale of opioids.
- **Safe and Appropriate Use of Opioids:** Ensuring appropriateness and safety of opioid use in those purchasing codeine products.

² Michna et.al. Removal of Opioid/Acetaminophen Combination Prescription Pain Medications: Assessing the Evidence for Hepatotoxicity and Consequences of Removal of These Medications *Pain Medicine* 2010; 11: 369–378

- **Educating Patients on Opioids:** Ensuring proper education on the safe use, storage and disposal of codeine products to reduce diversion.
- **Increased Pharmacist Intervention Minimizing Burden on Healthcare System:** Provide appropriate pharmacist intervention and clinical oversight during the sale of these products while minimizing the burden on the Healthcare system through increased physician visits.

As such, Neighbourhood Pharmacies supports Health Canada's initiative to move ECPs to be sold via prescription only and granting authority to pharmacists to prescribe these products, in a model similar to that adopted in Manitoba. We feel that enabling pharmacists to prescribe and de-prescribe these substances supports a solution that both reduces harm but also prevents dependence leveraging frontline pharmacist expertise and professional judgement. It also provides an opportunity to capture sales data through patients' health records which can help better inform evidence-based policy and practice changes moving forward. We have seen a tremendous positive impact of this strategy in Manitoba, with over 90% reduction in ECP sales, and the centralized prescription data has enabled analyses to investigate whether there has been a subsequent increase in physician-prescribed, more potent opioids.

Neighbourhood Pharmacies represents Canada's leading pharmacy brands who deliver high value, quality care to Canadians in all models including chain, banner, long-term care, and specialty pharmacies as well as grocery chains and mass merchandisers with pharmacies. We advocate for community based care through leveraging our members' high accessibility and proven track record of providing optimal patient care closer to where patients live, work and play. By leveraging the over 10,500 points of care with pharmacies conveniently located in every neighbourhood across Canada, Neighbourhood Pharmacies aims to advance sustainable healthcare for all stakeholders.

Sincerely,



Justin J. Bates
Chief Executive Officer