

**Written Submission for Health Canada
Consultations on the Distinction Between
Promotional and Non-promotional Messages
and Activities for Health Products**

**By: Neighbourhood Pharmacy Association of
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Recommendation 1: That the government amend the Regulations in order to promote greater clarity by specifically referring to pharmacists and pharmacies in the first statement of section 2.8 to read as follows: “Health care professionals *such as physicians or pharmacists*, may promote medical procedures and services (e.g. medical cosmetic services) offered in their clinics, *or pharmacies*, to the general public.”

Recommendation 2: That the government ensure guidelines/regulations allow pharmacies to communicate openly and clearly any opioid-related services available to patients in the most effective, accessible way. This includes permitting the use of terminology widely regarded as familiar and commonplace, such as medication names.

Recommendation 3: That the government refrain from guidelines/regulations developed to limit, restrict or inhibit pharmacists or pharmacies from raising awareness of services offered that are of vital importance to people facing barriers due to substance/opioid use.

Recommendation 4: That the government, in determining guidelines/regulations on the distinction between promotional and non-promotional messages and activities for health products, demonstrate a clear recognition, understanding and sensitivity towards opioid-dependent patients. For most patients seeking pharmacological interventions related to opioid use, product names (e.g. naloxone, methadone) function as shorthand for requesting the associated service/treatment.

To illustrate this point, we offer two examples of everyday scenarios in the opioid crisis encountered by pharmacies:

- naloxone and Narcan are critical in the event of an emergency due to opioid overdose. In this instance, the common request made by a patient to their pharmacist is, “I need a naloxone kit.”
- methadone, Methadose and Suboxone are vital to supporting harm reduction in the context of sustained opioid use. When managing opioid dependence, patients typically reference these precise medications to indicate the associated *service* they require (e.g. opioid dependence treatment). Rarely do patients make an explicit request for “opioid dependence treatment.” Most are not familiar with the service by this name.

Given these everyday examples that illustrate how harm reduction and emergency treatment are optimized by clear communication of the availability of these products, we suggest guidelines/regulations that allow pharmacists and pharmacies to visibly raise awareness and indicate the availability of these services through the use of specific medications *by name*. **In the view of the general public, the specific names of opioid-related medications are perceived as synonymous with the services to which they correspond, e.g. naloxone refers to an overdose/emergency; methadone refers to dependence treatment.**

Introduction

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) appreciates the opportunity to provide this Submission Brief to Health Canada as part of your consultation on the draft guidance: *The Distinction Between Promotional and Non-promotional Messages and Activities for Health Products*, formerly known as a policy entitled *The Distinction Between Advertising and Other Activities*.

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 over 10,500 points of care with pharmacies conveniently located in every community across Canada, Neighbourhood Pharmacies aims to advance sustainable healthcare for all stakeholders.

Neighbourhood Pharmacies broadly supports the efforts and progress made by government to create a healthier Canada. As a key stakeholder in Canada's healthcare framework, Neighbourhood Pharmacies has engaged extensively with government to improve individual and population health as it undertakes changes to Canada's medical cannabis regimes, and we support government's work towards developing a made-in-Canada Pharmacare program, and your strategies and approaches to address the opioid crisis.

Neighbourhood Pharmacies: Submission Highlights

This submission aims to educate government on the importance of allowing pharmacies to use medication names; especially when these names serve as shorthand for associated (often life-saving) treatments and services. In this submission, Neighbourhood Pharmacies will demonstrate why product names are particularly critical in the context of the opioid crisis.

We address 3 main considerations in our response:

1. ensuring equitable access to vital emergency and harm-reduction services for opioid-dependent patients
2. offering primary care in community settings, pharmacists and pharmacies are uniquely situated to remove barriers for patients
3. to be up-to-date, accurate and relevant, government regulations should appropriately take into account the sensitivities and complexities associated with the opioid crisis, and be open to a multi-pronged approach

1. Ensuring Equitable Access to Vital Emergency and Harm Reduction Services for Opioid-Dependent Patients

Pharmacies that visibly indicate the availability of medications such as naloxone, Narcan, methadone, Methadose and Suboxone choose to communicate the availability of *treatments* using these names because this is the vocabulary and terminology with which their patients are familiar.

To be clear, in this context pharmacies are not promoting a *product*; they are raising awareness of an available *treatment* using the most common product name. Specifically, reference to the availability of “Naloxone Kits” is common practice to ensure the availability and accessibility of this life saving medication. Similarly, while promoting the availability of “Methadone Maintenance Treatment” requires the use of the product name itself, it is the terminology with which patients are familiar, and henceforth, the most effective way to raise awareness for available treatment options.

In this way, pharmacies are helping to promote and ensure equitable access to vital emergency and harm-reduction services for their opioid-dependent patients.

Regulations that prohibit or obstruct pharmacies from communicating this information in an easy-to-understand way risk creating further barriers to accessibility. Introducing new barriers would be particularly concerning for a community already enduring stigma, marginalization and limited interaction with health care providers.

2. Offering primary care in community settings, pharmacists and pharmacies are uniquely situated to remove barriers for patients

Neighbourhood Pharmacies seeks to educate and facilitate a comprehensive understanding of how pharmacists and pharmacy services fulfil a critical role in emergency interventions, education and harm reduction treatments for people living with opioid dependency.

With over 10,500 points of care across Canada, pharmacies are on the frontlines of the opioid crisis in diverse communities – rural, urban, suburban and remote. In these communities, pharmacists are important primary care providers and, as such, have an important role in advocating for the health, safety and wellbeing of patients within their community.

Community pharmacies that routinely serve patients living with opioid dependency provide education, medication and treatments. However, these pharmacies are also acquainted with the barriers encountered by their patients. Pharmacies are advocating for an approach to communicating information that is in the best interest of their patients and that reflects an understanding of the particular challenges associated with this crisis.

In its approach to information-sharing regarding the opioid crisis, Health Canada makes specific mention of naloxone as part of its strategy. Material posted on the [Health Canada](#) website explicitly references “[naloxone and where you can get it.](#)”

3. To be up-to-date, accurate and relevant, government regulations should appropriately take into account the sensitivities and complexities associated with the opioid crisis, and be open to a multi-pronged approach.

As [Health Canada](#) explains, the opioid crisis “is affecting the health and lives of people from all walks of life, all age groups and all socio-economic backgrounds.” It therefore makes sense that, to support people in getting the help they need, [Health Canada](#) suggests “listening with compassion and without judgement, so a person who uses drugs feels heard and understood.”

Adopting the vocabulary understood by people using these substances, as opposed to insisting on the use of unfamiliar terms, may increase the likelihood of these patients more readily interacting with health care providers. Promoting comfortable, open communication can better support harm reduction strategies. However, enacting complicated regulations for products commonly-referenced by patients demonstrates a fundamental lack of understanding. Furthermore, it introduces confusion and could compromise the ability of a patient to navigate and access care.

Conclusion

Neighbourhood Pharmacies represents Canada's leading pharmacy brands 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 are calling on the federal government to remain sensitive, attentive and compassionate in its approach to the opioid crisis. In its suggested approach to helping people who use drugs, [Health Canada](#) accurately notes that “words matter.”

It is precisely for this reason – “words matter” – that Neighbourhood Pharmacies reiterates the importance of allowing pharmacies and pharmacists to explicitly use language and vocabulary that is common and familiar. In order to promote the treatments available for overdose (naloxone, Narcan) and harm-reduction (methadone, Methadose and Suboxone), using words that resonate with these patients is an effective way of supporting their efforts to seek and obtain care.

We look forward to working in partnership with Health Canada and ensuring that people living with opioid dependence are free to navigate and readily access the treatments they need – without the introduction of additional barriers.