

May 21, 2019

Abby Hoffman
Assistant Deputy Minister
Strategic Policy Branch
Health Canada
via email abby.hoffman@canada.ca

Assistant Deputy Minister Hoffman:

The National Association of Pharmacy Regulatory Authorities (NAPRA) is an alliance of the provincial and territorial pharmacy regulatory authorities as well as the Canadian Forces Pharmacy Services. Our members regulate the practice of pharmacy in their respective jurisdictions in Canada and their primary mandate is protecting and serving the public interest.

Recent efforts in the United States (US) to legalize the importation of drugs from Canada in order to mitigate drug costs pose a serious risk to Canada's healthcare system and the Canadian public. We trust that Health Canada will assess the impending risks outlined herein and will support a course of action that will protect Canadians from the consequences of the proposed changes in US legislation.

While NAPRA sympathizes with the underlying intent of such legislation – to lower prescription drug costs for US citizens – the importation of medicines from Canada is not the solution. Such proposed legislation does not address the root causes of drug pricing concerns in the US and is likely to put patients at risk on both sides of the border.

The Canadian medicine supply is not sufficient to support both Canadian and US consumers. A major risk to the Canadian public is the risk of supply chain shortages in Canada. Canada's current pharmaceutical supply system, the subject of national price negotiation and regulation, is designed to serve the Canadian population of approximately 36 million. Based on estimated Canadian requirements, Canada is allotted a certain quantity of pharmaceuticals from manufacturers who have global supply chains. If the US proceeds with its importation plan, the Canadian supply will quickly be depleted and Canadian patients' access to medication will be endangered.

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Alberta College of Pharmacy
Canadian Armed Forces – Pharmacy Services Division
College of Pharmacists of British Columbia
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Passing laws that encourage US consumers to find a safe Canadian online pharmacy will lead to a proliferation of illegal sites misrepresenting themselves as licensed Canadian pharmacies and exacerbating the patient safety threat on both sides of the border.

The Alliance for Safe Online Pharmacies (ASOP Global) estimates that there are already roughly 35,000 active online drug sellers, 96% of which are operating illegally, and 600 new illegal pharmacy sites are launched each month. Illegal pharmacy sites are easy to set up and highly profitable, and there is a very low risk of being caught or prosecuted.

The proliferation of illegal sites misrepresenting themselves as legitimate Canadian pharmacies poses a safety risk to both US and Canadian patients. Patients on both sides of the border looking to find medication online will be faced with an abundance of illegitimate sites which are often quite difficult to differentiate from sites that represent licensed Canadian pharmacies. Therefore, patients will be at risk of purchasing drugs from an illegitimate site, which may sell unapproved, counterfeit or altered drugs that are dangerous to their health.

Given the difficulty with enforcement against illegal foreign actors claiming to be Canadian pharmacies, there is a very real risk to the public, as well as the overall safety of the drug supply chain, in both Canada and the US.

International “mail order” of drugs compromises patient safety due to fragmentation of care and risks to the patient-health professional relationship. Since patients are likely to buy some of their medication in the US and some of their medication in Canada, their medication and healthcare records will not be complete in either location. This could lead to dangerous drug interactions or other health problems that could arise due to the lack of access to a complete patient record. This places pharmacists in a difficult position, as they will be asked to provide a medication without having access to all of the information required to properly assess the patient and the appropriateness of the medication for that patient, which is an expected standard of practice of pharmacists in Canada.

Furthermore, pharmacists cannot adequately assess and advise patients or manage problems with drug therapy if they do not have an existing pharmacist-patient relationship. It will be much more difficult for pharmacists to foster a strong relationship with a patient they have never met and for whom they do not have a complete patient record.

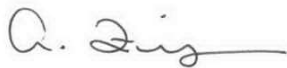
US law should not encourage Canadian pharmacists to violate their codes of ethics and standards of practice by providing medications to patients in the absence of a complete patient record and a pharmacist-patient relationship.

Canadian law prohibits the filling of prescriptions issued by US practitioners. This law is sometimes circumvented through mass "cosigning" of US prescriptions by Canadian practitioners who do not know the patient, do not perform an examination, and do not comply with the standards of care governing practice. US law should not encourage Canadian

practitioners to violate their codes of ethics and standards of practice by prescribing or dispensing medications for patients they have never met.

For these reasons, NAPRA urges policy makers, such as Health Canada, to shift their focus to meaningful, long-term reforms that will deliver affordable and accessible health care and pharmaceutical products to all patients within their respective regulated health care systems.

Sincerely,



Adele Fifield, O.Ont., CAE, BA, B.Ed
Executive Director
National Association of Pharmacy Regulatory Authorities

cc: Hon. Ginette Petitpas Taylor, Minister of Health
Hon. Ralph Goodale, Minister of Public Safety and Emergency Preparedness
Hon. Jim Carr, Minister of International Trade
Registrars, Canadian pharmacy regulatory authorities