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**Senate Standing Committee
Social Affairs, Science and Technology**

Bill C-17

***An Act to Amend the
Food and Drug Act***

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CPhA WITNESSES

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Canadian Pharmacists Association Speaking Notes

Good morning, and thank you to the Senate Committee for the invitation. My name is Perry Eisenschmid, I am the CEO of the Canadian Pharmacists Association, and with me is Janet Cooper, our Vice President of Professional and Membership Affairs.

As you know, CPhA is the national association representing pharmacists across Canada. We are also Canada's largest publisher of objective, evidence-based drug and therapeutic information for health care professionals. Through our print and digital publications, we also provide point-of-care access to the most current drug safety data, including advisories from Health Canada.

Medication safety is a priority for CPhA and for all pharmacists in Canada. Medications, both prescription and non-prescription drugs, should be both safe and effective. Although it is not possible to completely eliminate the risk associated with medication use, pharmacists devote considerable time to counselling patients on the appropriate and safe use of these medications, and monitoring their use to improve drug-therapy outcomes. This is why CPhA has supported the intent and direction of C-17 since its introduction in December 2013.

CPhA supports amendments to the Food and Act that increase penalties for unsafe products, the new powers for Health Canada to recall unsafe products, and the requirement for drug companies to revise labels to clearly reflect health risk information, which could include potential updates for health warnings for children. We also support the Minister's powers to compel companies to do further testing or studies on a product, when safety issues are identified, including issues with certain at-risk populations.

While we support the content and direction of the current Bill, we believe there is room for improvement in a few key areas.

In a previous appearance to the Standing Committee on Health in June, CPhA encouraged inclusion of Natural Health Products within the scope of the bill to help protect Canadians from a widely used category of products – some of which little is known in terms of safety. NHPs are medicinal products and are taken by Canadians with the intention of affecting their health. We reiterate that “natural” should not be interpreted as meaning “safe”. NHPs have the ability to cause harm, and given their widespread use, CPhA feels that Natural Health Products should be included within the scope of the Bill.

CPhA supports the need to improve reporting of adverse drug reactions. Collection of such information provides pharmacists, physicians, nurses and other health care providers with vital information that allows them to make decisions on the best course of action when medications are needed.

However, we strongly recommend that greater clarity be provided with regards to the content of the Bill related to the section on adverse drug reaction reporting. From the point of view of health care providers, this section of the Act does have the potential to cause undue alarm and confusion since the current wording of the Bill can be interpreted very differently.

Specifically in section 21.8, the Bill mandates the need for adverse drug reporting by stating the following: “A prescribed health care institution shall provide the Minister, within the prescribed time and in the prescribed manner, with prescribed information that is in its control about a serious adverse drug reaction...”

The meaning of this is not clear. What exactly is a “prescribed health care institution” that needs to provide “prescribed information”? Is a community pharmacy or a community health centre such an establishment? It would be helpful to clearly define what venues constitute prescribed institutions.

What is a “serious adverse drug reaction”? A clear definition for “serious” is needed. Health care providers, including pharmacists, deal with serious adverse events daily. Practitioners are busy and we need to support them in the reporting of new or unexpected patient safety information – we don’t need unnecessary paperwork. For example, is it really important to report serious drug reactions that are already well known? Many of these reactions are well documented and may be an expected event in the delivery of health care (for example, with anticoagulants and oncology drugs). The utility and burden of reporting such an event needs to be considered. Wouldn’t it be better to spend effort to report adverse events that are previously unreported, underreported, not well known or unanticipated? Serious adverse reaction reporting for events that are not well documented serve great value in helping to better inform health care providers and patients of the risks associated with particular therapies, and to support Health Canada in further actions based on identified risks.

But reporting is just the first step in this important process. Once these issues are clarified, Health Canada needs to set up a transparent and accessible method for health care providers and the public to ACCESS and USE the information collected. As pharmacists, we believe that Health Canada should be transparent in the provision and aggregation of the information it receives from mandatory reporting, but the current legislation is unclear on whether and how this information will be analyzed and shared. Providers need access at the point-of-care to inform their decision making and treatment plans – ideally this will be seamlessly integrated into their electronic patient care systems.

In short Mr. Chair, the Canadian Pharmacists Association continues to be supportive of Bill C-17. Given pharmacists’ focus on safe and effective use of medications, and CPhA’s commitment to ensuring health care providers have access to current, Canadian, evidence-based drug, therapeutic and safety information, CPhA believes that this legislation is a major step in the right direction. However, there are some improvements and clarifications that would make the Bill even better. As always, CPhA is ready, willing and able to support this effort.

Thank you, Senator Ogilvie and committee members, for the opportunity to meet with you today. We would be pleased to respond to your questions.