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November 16, 2016

Hon. Jane Philpott, P.C. M.P.
70 Colombine Driveway
Tunney's Pasture
Postal Location: 0906C
Ottawa, Ontario
K1A 0K9

Dear Minister Philpott,

I am writing you in regard to a policy statement on codeine products recently adopted by the Board of Directors of the Canadian Pharmacists Association (CPhA). CPhA is deeply concerned about the growing crisis of opioid abuse and misuse in Canada, and is committed to providing national leadership on this important health care issue.

At its October 19, 2016 meeting, the CPhA Board of Directors passed the following policy statement:

All codeine products should be available by prescription only, and a critical review of the evidence in support of codeine products should be undertaken.

As you are aware, almost all opioids require a prescription, whereas products with less than or equal to 8mg of codeine are available over the counter in every province except Manitoba. Although we know that codeine can quickly form dependence and cause serious side effects, the therapeutic efficacy of low-dose codeine (8 mg) is unknown. We note that earlier this year you announced that the federal government will introduce regulatory changes requiring a prescription for low-dose codeine products. While CPhA fully supports this move, we also encourage Health Canada, working with health and patient stakeholders, to undertake a critical review of the clinical evidence in support of all codeine products.

While we believe it is important to regulate low-dose codeine products, it's equally important to involve patients in any dialogue on solutions to ensure that there are appropriate checks and balances in place when it comes to accessing pain management therapies. CPhA also acknowledges the importance of helping patients manage the impact of this change, particularly patients who are experiencing addiction. Once low-dose codeine products are no longer available without a prescription, community pharmacists will be responsible for communicating this change to patients, and helping patients manage symptoms of withdrawal.

If we are going to effectively fight the opioid crisis in Canada we need to fully leverage the skills and expertise of the pharmacist profession. Regulatory changes have been introduced in most provinces to authorize pharmacists to prescribe and adapt prescriptions. This can involve making adjustments to dosing, quantities, dosage forms or directions for a particular medication. However, the *Controlled Drugs and Substances Act* (CDSA) currently does not include pharmacists in the list of practitioners who can prescribe CDSA-scheduled drugs. This prevents pharmacists from using their prescribing authority to adapt prescriptions for opioids.



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CPhA believes that designating pharmacists as practitioners under the CDSA is a meaningful and effective action to combat the opioid crisis in Canada. It is increasingly common for community pharmacists to receive prescriptions for inappropriate dosages and quantities of initial opioid prescriptions. Amending the *Act* to include pharmacists could have a significant impact on appropriate medication management and patient outcomes. Pharmacists with this capacity could reduce the dosage of opioids for patients where appropriate and instead prescribe alternative therapies.

Minster, we applaud your efforts to bring national leadership to the issue of opioid abuse and misuse. We would be pleased to discuss with you the issues raised in this letter and how the pharmacist profession can further assist the government achieving its goals around opioid abuse and misuse.

Regards,

Perry Eisenschmid, BBA, MBA, C.Dir., H.R.C.C.C.
Chief Executive Officer

Cc: CPhA Board of Directors