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The Honourable John Haggie
Minister of Health and Community Services
Government of Newfoundland and Labrador
P.O. Box 8700, St. John's, NL A1B 4J6

May 10, 2018

Dear Minister Haggie,

As drug experts with an obligation to ensure safe and optimal use of medications, pharmacists have a key role to play in the prevention and treatment of opioid harms and dependency, including in the area of appropriate opioid prescribing and dispensing.

According to the Canadian Institute for Health Information, the proportion of all opioid prescriptions that were for strong opioids rose by 5% between 2012 and 2016. Although this increase is modest, it is of concern given the increased risk of substance abuse associated with the use of strong opioids. During this same timeframe, there was a significant increase in the weaker opioid tramadol. Tramadol prescriptions and defined daily doses rose by 30% and 23%, respectively. Further, for seniors aged 65 and older, more than 200 per 1,000 population were prescribed an opioid in 2015–2016. During this time, seniors had the highest rate of hospitalizations resulting from opioid poisonings.

Pharmacists in Newfoundland and Labrador are not being used to the full extent of their scope and expertise to help address inappropriate opioid use, which kills thousands of Canadians each year. Pharmacists are well positioned to take on a larger role in curbing opioid dependency and misuse through increased monitoring and intervention of inappropriate prescribing and dispensing practices. **This can be achieved by amending the Controlled Drugs and Substances Act (CDSA) to include pharmacists as “practitioners” authorized to prescribe controlled drugs and substances.**

Regulatory changes have been introduced in most provinces to authorize pharmacists to prescribe or adapt prescriptions. This can involve making adjustments to dosing, quantities, dosage forms or directions for a particular medication. And in the case of an adaptation to an original prescription, pharmacists are always required to communicate changes to the original prescriber. However, the CDSA does not currently include pharmacists in the list of practitioners who can prescribe and adapt CDSA-scheduled drugs.

It is common for community pharmacists to receive prescriptions for inappropriate dosages and quantities of initial opioid prescriptions. By designating pharmacists as “practitioners” within the CDSA and ensuring pharmacists have access to the indication for opioid treatment, pharmacists would be authorized to adapt, reduce or taper the dosage of opioids for patients, where appropriate, and instead prescribe or recommend alternative therapies, while ensuring that the original prescriber is consulted and notified of any changes.

As such a change to the CDSA requires a provincial request, we would like to ask you to urge the federal government to amend the CDSA to include pharmacists as “practitioners” authorized to prescribe controlled drugs and substances and demand that all opioid prescriptions include an indication for treatment.

With this authority, pharmacists would also be able to work more closely with patients and health care teams to manage opioid replacement therapies, such as methadone and buprenorphine/naloxone (Suboxone), to achieve appropriate dosing and provide better overall support. Our organization will work to support this collaboration between pharmacists, nurses and physicians through outreach initiatives and education to establish role clarity, trust and confidence.

Given the toll that opioids have taken on our society, we must allow all health care practitioners to use their expertise to help solve this crisis. As the most accessible, community-based health care professionals, pharmacists are ideally positioned to close this care gap by increasing the oversight of opioid prescribing and mitigating the risks to patients receiving opioid therapy.

The Pharmacists’ Association of Newfoundland and Labrador is committed to working with your government to advance this solution and improve patient safety and health outcomes in the face of the opioid crisis.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Gillingham', with a stylized flourish at the end.

Steve Gillingham
President
Pharmacists’ Association of Newfoundland and Labrador