



2019 July 2

Office of Legislative and Regulatory Affairs
Controlled Substances Directorate
Healthy Environments and Consumer Safety Branch
Department of Health
0302A, 150 Tunney's Pasture Driveway
Ottawa, Ontario K1A 0K9
email: hc.csd.regulatory.policy-politique.reglementaire.dsc.sc@canada.ca

Re: Order Amending Schedule I to the Controlled Drugs and Substances Act (Tramadol)

Dear Office of Legislative and Regulatory Affairs,

The Canadian Society of Hospital Pharmacists (CSHP) is pleased to respond to the Notice to Interested Parties and provide comments on Health Canada's intent to move the regulation of tramadol from the Food and Drugs Act to the Controlled Drugs and Substances Act.

CSHP's members and individual supporters include pharmacists, pharmacy technicians, and pharmacy students. CSHP is committed to patient care through the advancement of safe, effective medication use in hospitals and other collaborative healthcare settings. Our members support the amendment of Schedule 1 to the Controlled Drugs and Substances Act to include the following:

"27 Tramadol (2-[(dimethylamino)methyl]-1-(3-methoxyphenyl)cyclohexanol), its salts, isomers and salts of isomers and the following derivatives of tramadol and the salts, isomers and salts of isomers of these derivatives:

- (1) *O*-desmethyltramadol (3-[2[(dimethylamino)methyl]-1-hydroxycyclohexyl]-phenol)
- (2) *N,O*-didesmethyltramadol (3-[1-hydroxy-2-[(methylamino)methyl]cyclohexyl]-phenol)"

[source: Canada Gazette, Part I, Volume 153, Number 16]

We welcome the benefits that will come with this amendment: strengthened pharmacovigilance of tramadol, additional powers that will be given to Canadian law enforcement agencies to take action in response to unauthorized activities associated with tramadol and its related substances, all of which stands to strengthen the controls to prevent and detect diversion activities involving tramadol.

Thank you for the opportunity to comment on the proposed amendment. If you have any questions about the information provided herein, please do not hesitate to contact me at clyder@cshp.pharmacy or (613)-912-4108.

Sincerely,

A handwritten signature in purple ink that reads "G. Clyder".

Director, Professional Practice

CC Douglas Doucette, President, Canadian Society of Hospital Pharmacists
Jody Ciuffo, Chief Executive Officer, Canadian Society of Hospital Pharmacists