

November 6, 2019

The Right Honourable Justin Trudeau, P.C., M.P.
Prime Minister
80 Wellington Street
Ottawa, Ontario
K1A 0A2

Dear Prime Minister Trudeau:

We are writing to follow up on previous efforts undertaken by our organizations to share our concerns regarding U.S. drug importation proposals and their impact on Canada's drug supply. As you prepare to form your next government, we urge you to prioritize consideration and action on this issue and to work with your fellow Parliamentarians to move forward in the interests of all Canadians. We wish to reaffirm our urgent request for clarity on the steps the government will take to prevent drug shortages as a result of possible U.S. drug imports from Canada.

We believe this complex issue merits **swift and decisive action** by Canada's government and wish to contribute to the government's assessment of next steps. Our position is that a "whole-of-government" approach is necessary to prevent the transfer of Canada's drug supply to the United States through wholesale and bulk U.S. importation, including any arrangements by commercial entities that distribute Canadian medications to the United States on a mass scale. We encourage the government to take an expansive view of measures, including all legislative, regulatory and policy levers available, to protect Canada's medicine supply and hope that a future briefing could delve further into this domain. We also encourage the government to leverage the expertise and experience of our patient, healthcare provider, and industry organizations to ensure there are no unintended consequences on Canadians.

We have enclosed a letter sent to Health Minister Ginette Petitpas Taylor, where we reacted to various U.S. state and federal legislative proposals that would allow importation from Canada. We appreciated the Minister's timely response to our letter dated July 25 and our roundtable feedback session with Health Canada officials on August 12. While we also appreciated a subsequent technical briefing with Health Canada officials, the briefing did not alleviate our concerns about U.S. federal and state proposals to import medicines from Canada.

Shortly following our letter to Minister Petitpas Taylor, the U.S. government issued its own importation plan, which includes a stream specifically dedicated to permitting the importation of medicines from Canada to states, pharmacies and wholesalers. The U.S. Secretary for the Department of Health and Human Services noted in reference to this plan that, "What we're talking about are the same drugs that Canadian citizens have access to in Canadian cities."¹ Recent news reports suggest the U.S. Food and Drug Administration has already submitted draft regulations for one portion of the U.S. *Safe Importation Action Plan* to the White House for approval.²

¹ <https://www.weau.com/content/news/Trump-Administration-plans-to-allow-prescription-drug-imports-from-Canada--514019891.html>

² <https://insidehealthpolicy.com/inside-drug-pricing-daily-news/trump-import-plan-would-complicate-tracking-storing-drugs>

As we emphasized in both our letter and subsequent meeting with Minister Petitpas Taylor, Canada's hospital and community pharmacies are resourced to serve the Canadian public. They are not equipped to respond to the needs of another country – let alone one 10 times its size – without creating significant access or quality issues for Canadians. Canadian patients already face persistent drug shortages for a number of complex reasons; put simply, our health system cannot withstand further external pressures on our drug supply. In fact, over the past six weeks alone, over 100 new medicines have been subject to shortages in Canada.³

Canadian patients have already experienced temporary drug shortages in border communities attributable to the rise in patients crossing from the U.S. to Canada to access medicines. As a result, pharmacists are being placed in an ethical dilemma, where they must decide between protecting the domestic drug supply and meeting their professional duty to serve patients in need of life-saving medicines.

We noted with appreciation your public statement regarding the U.S. *Safe Importation Action Plan*, and your commitment to maintain patients' access to prescription medication for all types of medicines. At the same time, it is important to recognize the mere announcement of the U.S. plan may have adverse consequences on Canada's pharmaceutical supply, such as inciting panic among patients and stockpiling.

We believe Canadians will applaud the government in taking strong and decisive action.

For this reason, in the coming weeks, we urge our government to prioritize the use of levers to protect Canada's drug supply from U.S. drug importation plans, and to engage our members whose experience and expertise will contribute to an optimal policy solution for Canadians.

Canadians need to know the actions the government is prepared to take to protect our drug supply and we are ready and willing to assist in this effort by participating in a more open exchange of perspectives. We look forward to working with the government towards that end and reiterate our commitment to providing honest feedback to these discussions as they evolve.

Sincerely,

Alliance for Safe Online Pharmacies Canada
Joelle Walker, Chair

Best Medicines Coalition
John Adams, Chair & Paulette Eddy, Executive Director

Canadian Patient Safety Institute
Chris Power, Chief Executive Officer

Canadian Medical Association
Sandy Buchman MD CCFP (PC) FCFP, President

³ <https://www.pharmacists.ca/news-events/news/federal-parties-remain-silent-as-drug-shortages-grow-more-than-129-new-shortages-since-election-called/>

Canadian Nurses Association
Mike Villeneuve, Chief Executive Officer

Canadian Organization for Rare Disorders
Durhane Wong-Rieger, President and Chief Executive Officer

Canadian Pharmacists Association
Joelle Walker, Vice President, Public Affairs

Canadian Society of Hospital Pharmacists
Tania Mysak, BSP, PharmD, President

Diabetes Canada
Seema Negpal, Vice President, Science and Policy

HealthcareCAN
Paul-Émile Cloutier, President and Chief Executive Officer

Health Charities Coalition of Canada
Connie Côté, Chief Executive Officer

McKesson Canada
Anthony Leong, Vice President, Government Affairs

Neighbourhood Pharmacy Association of Canada
Sandra Hanna, Interim Chief Executive Officer

OnPharm-United
Sherif Guorgui, co-CEO/Chief Strategy and Stakeholder Relations Officer

Shoppers Drug Mart/Loblaw Companies Limited
Deb Saltmarche, Senior Director, Professional Affairs

cc:

The Hon. Ginette Petitpas Taylor, P.C., M.P.

The Hon. Andrew Scheer, P.C., M.P.

Yves-Francois Blanchet, P.C., M.P.

Jagmeet Singh, P.C., M.P.

Elizabeth May, P.C., M.P.

Ian Shugart

Stephen Lucas

Marta Morgan

Katie Telford

Brian Clow