



2019 May 7

Office of Legislative and Regulatory Affairs
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Ottawa ON K1A 0K9
Email: hc.csd.regulatory.policy-politique.reglementaire.dsc.sc@canada.ca

Re: Notice to Interested Parties - Regulatory amendments regarding pharmacists

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 amend the *Narcotic Control Regulations* (NCR), the *Benzodiazepines and Other Targeted Substances Regulations* (BOTSR) and the *Food and Drug Regulations - Part G* (FDR - Part G), as they pertain to pharmacists.

CSHP's 3200-plus 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. While CSHP acknowledges that the majority of its members practise according to the "Hospitals" section of the regulations, it is important to CSHP that the regulations reflect contemporary pharmacy practices, close regulatory gaps, remove barriers to practice, and remove inconsistencies between the regulations. We also look forward to the opportunity to comment on amendments to the "Hospitals" sections in the near future.

CSHP supports Health Canada in its intention to modernise and harmonise the regulations. Below we summarise CSHP's recommendations, provided for consideration as the amendments to the regulatory framework for controlled substances evolve. We believe these changes would encourage the proper use of human resources (aligning legislation with work responsibilities and the skills of different cadres of pharmacy personnel), facilitate evolving technologies used in pharmacies, and support better patient care.

- Amend all 3 regulations to include regulated pharmacy technicians (as defined in Part C of the Food and Drugs Regulation), allowing them to do the following:
 - order and receive controlled substances
 - receive verbal orders and transfer prescriptions, where otherwise permitted by law

- dispense controlled substances, in according to their scope of practice (set by the respective provincial/territorial pharmacy regulatory authority)
 - destroy and witness the destruction of unserviceable controlled substances
 - notify the Office of Controlled Substances of a loss or theft of controlled substances.
- Amend the regulations to accept the electronic means of receiving prescriptions from practitioners.
- Include sections that address the use and control of security codes that are used in processing transactions (such as ordering or receiving stock, processing prescriptions, and storing or retrieving information about transactions involving controlled substances).
- Recognise a pharmacist's ability to adjust doses, reduce quantities on prescriptions for controlled substances—within the pharmacist's scope of practice (set by the respective provincial/territorial pharmacy regulatory authority)
- Consider removing provisions for verbal orders for controlled substances as it pertains to practice outside of hospitals and other healthcare institutions.
- Consider removing section 36 of the Narcotic Control Regulations (exempt codeine products): these products should be available only by prescription.
- Establish security requirements set in accordance with a risk assessment framework (similar to the framework in the [Directive on Physical Security Requirements for Controlled Substances and Drugs Containing Cannabis](#)).
- Where appropriate, use similar language in the Benzodiazepine and Other Targeted Substances Regulations for the relevant sections in the Part G of the Food and Drug Regulation and the Narcotic Control Regulations (see attachment for more information). Such harmonisation, where justified according to risk, would support compliance and reduce the reliance on practice charts found across Canada (see [Prescription Regulations Summary Chart](#) and [Prescription Regulation Summary Chart](#) as examples).
- Recommend against creating a section called “Pharmacies” as that would be too restrictive since pharmacists and pharmacy technicians handle or prescribe controlled substances in areas other than a licensed pharmacy (e.g., drug preparation premise).
- Rearrange the content in a consistent manner among all 3 regulations, as much as possible (knowing that all 3 regulations do not address identical content).

Additional information regarding these recommendations is provided in the attachment to this letter.

Thank you for the opportunity to share our recommendations and comments. CSHP looks forward to participating in further consultations regarding amendments to the 3 regulations. 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.

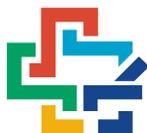
Sincerely,



Cathy Lyder
Director, Professional Practice

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

Encl: Comparison of Regulations, by Topic



Comparison of Regulations, by Topic

The following chart was created to assist CSHP in its review, to identify opportunities to harmonise, modernise the regulations and to close any apparent gaps therein.

Topic	<u>Food and Drug Regulation Part G (Controlled Drugs)</u>	<u>Narcotic Control Regulations</u>	<u>Benzodiazepine and Other Targeted Substances</u>	Comments/Questions
Storage/safe keeping drugs	G.03.012 A pharmacist shall take all reasonable steps that are necessary to protect controlled drugs on his premises or under his control against loss or theft.	43 A pharmacist shall take all reasonable steps that are necessary to protect narcotics on his premises or under his control against loss or theft.	[not in the Pharmacist section] 6 Subject to section 59, a person licensed or otherwise authorized under these Regulations to deal in a targeted substance must store the targeted substance in the place used for the purpose of conducting their business or professional practice	security requirements set in accordance with a risk assessment framework (similar to the framework in the <u>Directive on Physical Security Requirements for Controlled Substances and Drugs Containing Cannabis</u>) See Licences and Licensed Dealers in section 2 of Part G of the FDR

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			and in the area in that place where only authorized employees have access, except where the targeted substance is for the person's own use or for the benefit of another person or animal under their care.	
Reporting loss/theft	G.03.013 A pharmacist shall report to the Minister any loss or theft of a controlled drug within 10 days of his discovery thereof.	42 A pharmacist shall report to the Minister any loss or theft of a narcotic within 10 days of his discovery thereof.	[not in the Pharmacist section] 7(1) The following persons must take any steps that are necessary to ensure the security of a targeted substance in their possession	Use the approach taken in the BOTSR: take the provision outside the Pharmacist section, making the requirement for all groups listed, and add pharmacy technicians to the list

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			<p>and any licence or permit in their possession with respect to a targeted substance and must, not later than 10 days after discovery, report to the Minister any loss or theft of a targeted substance or of a licence or permit:</p> <p>(a) a licensed dealer; (b) a pharmacist; (c) a practitioner; (d) the person in charge of a hospital; (e) a person to whom an exemption has been granted under section 56 of the Act; and (f) a person who, pursuant to a permit issued under Part 7, is responsible</p>	

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			for the targeted substance while it is in transit or in transshipment in Canada.	
Security of codes	[unclear where or if this is addressed]	[Section 27 (6) addresses remote input devices]	[not in the pharmacist section, but rather in Security and reporting loss or theft]	Add that the code is unique and is not to be shared. Add the section from BOTSR to Part G and Narcotic Control Regulations.
Dispense/sale of drugs	G.03.002 No pharmacist shall, except as otherwise provided in this Part, sell or provide a controlled drug to any person unless the pharmacist has first been provided with a prescription for it, and (a) if the	31 (1) No pharmacist shall sell or provide narcotics except in accordance with this section and sections 34 to 36 and 45. (2) A pharmacist may sell or provide a narcotic to a person (a) if the person is exempted under	Prescription required 51 (1) In addition to the activities authorized under section 55, a pharmacist may, subject to section 52, sell, provide, send, deliver or transport a targeted	Allow for e-prescriptions that are transmitted in a secure manner Disallow verbal orders, assuming the prescription can be sent electronically (while keeping verbal orders for hospital)

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	<p>prescription is in writing, it has been signed and dated by the practitioner issuing the same and the signature of the practitioner where not known to the pharmacist, has been verified by him; or (b) if the prescription is given verbally, the pharmacist has taken reasonable precaution to satisfy himself that the person giving the prescription is a practitioner.</p>	<p>section 56 of the Act with respect to the possession of that narcotic; (b) except in the case of diacetylmorphine (heroin), if the pharmacist has received a written order or prescription for the narcotic that is signed and dated by a practitioner and the signature of the practitioner, if not known to the pharmacist, has been verified by the pharmacist; or (c) in the case of diacetylmorphine (heroin), if the pharmacist has received a written order or prescription</p>	<p>substance to or for an individual or for the benefit of an animal if (a) the pharmacist sells or provides the substance in a container labelled in accordance with subsection (2); (b) the transaction is made pursuant to a prescription (i) dated and signed by a practitioner, (ii) provided verbally to the pharmacist by a practitioner, or (iii) transferred to the pharmacist under subsection 54(1) in accordance with subsection 54(2); (c) the pharmacist has not transferred the</p>	<p>Include pharmacy technicians</p>

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		<p>for the narcotic that is signed and dated by a practitioner of medicine or a nurse practitioner and the signature of the practitioner, if not known to the pharmacist, has been verified by the pharmacist.</p> <p>(2.1) For the purpose of subsection (2), for greater certainty, a pharmacist may sell or provide a narcotic to a midwife, nurse practitioner or podiatrist only if the midwife, nurse practitioner or podiatrist is permitted to prescribe or possess the narcotic, or to conduct an activity</p>	<p>prescription to another pharmacist; and (d) when the prescription has been provided verbally, the transaction is recorded by the pharmacist in accordance with subsection (3).</p>	

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		with it, in accordance with sections 3 and 4 of the New Classes of Practitioners Regulations		
Labelling			51(2) (2) A pharmacist who sells or provides a targeted substance to an individual must do so in a container that is labelled with the following information: (a) the name and address of the pharmacy or pharmacist; (b) the date of issuance of the prescription and the number given to it by the pharmacist; (c) the name of the individual or animal	Include pharmacy technicians

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			for whose benefit the targeted substance is sold or provided; (d) the name of the practitioner who issued the prescription; (e) the specified name or brand name of the targeted substance; (f) the quantity and, if applicable, the strength per unit of the targeted substance; and (g) the directions for use specified by the practitioner.	
Dispense/sale of drugs		35 (1) Subject to subsection (2), a pharmacist may provide a narcotic to an employee of a hospital		Include pharmacy technicians

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		<p>or a practitioner in a hospital if the pharmacist receives a written order for the narcotic signed and dated by (a) the pharmacist in charge of the dispensary of the hospital;</p> <p>(b) except in the case of diacetylmorphine (heroin), a practitioner who is authorized by the person in charge of the hospital to sign the order; or (c) in the case of diacetylmorphine (heroin), a practitioner of medicine or dentistry or a nurse practitioner who is authorized by the person in charge of the</p>		

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		<p>hospital to sign the order.</p> <p>(2) Before providing a narcotic under subsection (1), the pharmacist receiving the order must know the signature on the order or verify it.</p>		
Dispense/sale of drugs		<p>36 (1) Subject to subsection (2), a pharmacist may, without a prescription, sell or provide a preparation containing not more than 8 mg or its equivalent of codeine phosphate per tablet or per unit in other solid form or not more than 20 mg or its equivalent of codeine phosphate per 30 mL in a liquid preparation if</p>	<p>55(3) A pharmacist who sells, provides, sends, delivers or transports a targeted substance without a prescription must keep a record of the following information: (a) the brand name of the targeted substance or, if the targeted substance does not have a brand name,</p>	<p>Would support removing the exemption for “low-dose codeine products” (also known as “exempted codeine products”)</p>

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		<p>(a) the preparation contains</p> <p>(i) two additional medicinal ingredients other than a narcotic in a quantity of not less than the regular minimum single dose for one such ingredient or one-half the regular minimum single dose for each such ingredient, or</p> <p>(ii) three additional medicinal ingredients other than a narcotic in a quantity of not less than the regular minimum single dose for one such ingredient or one-third the regular minimum single dose</p>	<p>the specified name;</p> <p>(b) the quantity and strength per unit of the targeted substance; (c) the name and address of the person referred to in subsection (1) to whom the targeted substance was sold, provided, sent, delivered or transported; and (d) the date of the transaction.</p> <p>(4) The pharmacist must keep the written order or, if the order is verbal, must create a hard copy of the order.</p>	

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		<p>for each such ingredient; and</p> <p>(b) there is legibly and conspicuously printed on the inner label and the outer label, as those terms are defined in section A.01.010 of the Food and Drug Regulations, a caution to the following effect: "This preparation contains codeine and should not be administered to children except on the advice of a physician, dentist or nurse practitioner."</p> <p>(2) No pharmacist shall sell or provide a preparation referred to in subsection (1) if the</p>		

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		pharmacist has reasonable grounds to believe that the preparation is to be used for purposes other than recognized medical or dental purposes.		
Verbal orders		34 Subject to section 39, a pharmacist may dispense a verbal prescription narcotic on receipt of a prescription or verbal order given by a person whom the pharmacist has taken reasonable precautions to determine is a practitioner.		Include pharmacy technicians
Verbal orders	G.03.008 A pharmacist shall,	39 A pharmacist shall, before dispensing a	51(3)	Use the list of items to be recorded, as listed

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	<p>before dispensing a controlled drug pursuant to a prescription given orally or a verbal order, make a written record thereof, setting forth,</p> <p>(a) the name and address of the person named in the prescription;</p> <p>(b) the name, quantity and form of such controlled drug;</p> <p>(c) the directions for use given therewith;</p> <p>(d) the name, initials and address of the practitioner</p>	<p>verbal prescription narcotic pursuant to a verbal order or prescription, make a written record thereof, setting forth</p> <p>(a) the name and address of the person named therein;</p> <p>(b) in accordance with the manner in which it is specified in the prescription, the name and quantity of such oral prescription narcotic or the narcotic and the other medicinal ingredients therein; (c) the directions for use given therewith;</p> <p>(d) the name, initials and address of the practitioner who issued</p>	<p>(3) A pharmacist who receives a verbal prescription for a targeted substance must, before filling it, (a) record the following information:</p> <p>(i) the name and address of the individual or animal for whose benefit the prescription is provided,</p> <p>(ii) the date that the verbal prescription was provided, (iii) the specified name or brand name of the targeted substance, as specified in the prescription,</p>	<p>in the BOTSR, noting that drugs under the NCR cannot be refilled.</p> <p>While we prefer to not have verbal orders outside of hospitals, if they are to continue, pharmacy technicians should be allowed to receive verbal orders for controlled drugs or BOTS.</p>

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	<p>who issued the prescription;</p> <p>(e) the name or initials of the pharmacist who dispensed such controlled drug;</p> <p>(f) the date on which the controlled drug was sold or provided; and</p> <p>(g) the number assigned to the prescription.</p>	<p>the order or prescription;</p> <p>(e) the name or initials of the pharmacist who dispensed such oral prescription narcotic;</p> <p>(f) the date on which such oral prescription narcotic was sold or provided; and</p> <p>(g) the number assigned to the order or prescription.</p>	<p>(iv) the quantity and, if applicable, the strength per unit of the targeted substance,</p> <p>(v) the name of the recording pharmacist and the name of the practitioner who issued the prescription,</p> <p>(vi) the directions for use specified by the practitioner, and</p> <p>(vii) if the prescription is to be refilled, the number of times it may be refilled and, if specified, the interval between refills; and (b) keep a hard copy or</p>	

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			create a written record of the prescription.	
Compounding		<p>44 (1) No pharmacist shall prepare a narcotic unless the Minister has approved the formula thereof, and if such narcotic is a preparation described in section 36, has approved the label and the size of the container in which it will be sold.</p> <p>(2) A pharmacist who prepares a narcotic shall, in addition to all other records required to be kept, keep a record of the following: (a) the kind and quantity of any narcotic used in the</p>	49 A pharmacist may, in accordance with this Part, compound a targeted substance pursuant to a prescription.	<p>Use the wording from the BOTSR for all 3 regulations, while giving pharmacy technicians the same permission as pharmacists</p> <p>Define compounding or refer the reader to such a definition</p> <p>Define “prepare” as it pertains to the NCR. Does it refer to stock solutions or bulk products repackaged by the pharmacist?</p>

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		<p>preparation; (b) the name and quantity of the narcotic prepared; and</p> <p>(c) the date that the prepared narcotic was placed in stock.</p> <p>(3) For the purposes of this section, “prepare” does not include the compounding of a narcotic pursuant to a prescription of a practitioner</p>		
Refills	G.03.006 A pharmacist shall not refill a prescription for a controlled drug unless (a) the practitioner, at the time that he issued	37 A pharmacist shall not use an order or prescription, written or verbal, to dispense a narcotic after the quantity of the narcotic specified in the order	52 A pharmacist may only refill a prescription for a targeted substance if (a) the practitioner who prescribed it expressly directs	Section 37 in the NCR should be rewritten to clearly state that part-fills are allowed, but refills are not.

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	<p>the prescription, directed in writing, in the case of a controlled drug listed in Part I of the schedule to this Part, or directed in writing or orally, in the case of a controlled drug listed in Part II or III of the schedule to this Part, that the prescription be refilled, the number of times that it may be refilled and the dates for or the intervals between refills; and (b) the pharmacist keeps a record of each refilling of a prescription.</p>	<p>or prescription has been dispensed.</p>	<p>that the prescription may be refilled and specifies the number of refills; (b) the pharmacist makes a record of each refill in accordance with section 53; (c) less than one year has elapsed since the day on which the prescription was issued by the practitioner; (d) at least one refill remains on the prescription; and (e) in the case where an interval between refills has been specified by the practitioner, it has expired.</p>	

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Transfers	Not permitted	Not permitted	54 (1) A pharmacist may transfer a prescription for a targeted substance to another pharmacist, except a prescription that has already been transferred.	<p>The restriction on transfers should be made clear in Part G and NCR</p> <p>Include pharmacy technicians, permitting them to transfer a targeted substance</p>
Transfers			2) Before a pharmacist sells or provides a targeted substance to an individual under a prescription transferred under subsection (1), the pharmacist must (a) in the case of a verbal transfer, record the information required by	Include pharmacy technicians, permitting them to transfer a targeted substance

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			<p>subsection 51(3); (b) in the case of a written transfer, have obtained from the transferring pharmacist a copy of (i) the prescription written by the practitioner, or (ii) the record made in accordance with subsection 51(3) of the practitioner's verbal prescription; and (c) in all cases, record (i) the name and address of the transferring pharmacist, (ii) the number of authorized refills remaining and, if applicable, the specified interval between refills, and</p>	

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			(iii) the date of the last refill.	
Transfers			(3) A pharmacist who transfers a prescription under subsection (1) must record the date of the transfer, the name of the pharmacist to whom the prescription was transferred, the name and address of the pharmacy where that pharmacist practises and, if applicable, the number of refills that are being transferred.	Include pharmacy technicians, permitting them to transfer a targeted substance
Returns to licensed dealer or pharmacist	G.03.014 A pharmacist may, upon receiving a	45 (1) A pharmacist may, on receiving a	55 (1) A pharmacist may sell, provide, send, deliver or	Include pharmacy technicians in the respective sections.

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	<p>written order for a controlled drug signed and dated by</p> <p>(a) the licensed dealer who sold or provided that drug to them, return that drug to that licensed dealer;</p> <p>(b) another pharmacist, sell or provide any quantity of that drug to that other pharmacist that is specified in the order as being required for emergency purposes; (c) the Minister, sell or provide to or in accordance with his or her order any</p>	<p>written order for a narcotic</p> <p>(a) return the narcotic to the licensed dealer who sold or provided it to the pharmacist, if the order is signed and dated by the licensed dealer; or</p> <p>(b) sell or provide to another pharmacist the quantity of the narcotic that is specified in the order as being required for emergency purposes, if the order is signed and dated by the other pharmacist.</p> <p>(2) A pharmacist shall, immediately after returning, selling or providing a narcotic under subsection (1) or after receiving a</p>	<p>transport a targeted substance without a prescription to any of the following persons on receipt of an order from that person that specifies the name and quantity of the targeted substance:</p> <p>(a) if the order is written, a licensed dealer who (i) sold or provided the targeted substance, or (ii) is licensed to destroy targeted substances, other than those that the licensed dealer produced, made, assembled, sold or provided;</p>	

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	<p>quantity of that drug, specified in the order, that is required by the Minister in connection with his or her duties; and (d) a person exempted under section 56 of the Controlled Drugs and Substances Act with respect to that controlled drug, sell or provide to that person</p>	<p>narcotic under paragraph (1)(b) or subsection 65(4), enter the details of the transaction in a book, register or other record maintained for the purpose of recording such transactions.</p>	<p>(b) subject to subsection (2), (i) a practitioner, (ii) another pharmacist, if the other pharmacist states that the targeted substance is required because of a delay or shortfall in an order for the targeted substance placed with a licensed dealer, or (iii) a hospital, if the order is placed by a pharmacist practising in the hospital or by a practitioner who is authorized to order the targeted substance on behalf of the hospital; (c) the Minister, if the</p>	

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			<p>order is a written order signed on the Minister's behalf; or</p> <p>(d) a person to whom an exemption with respect to the targeted substance has been granted under section 56 of the Act, if the order is a written order and is accompanied by a copy of the exemption.</p> <p>(2) In the circumstances set out in subparagraphs (1)(b)(i) to (iii), if the order is verbal, the pharmacist must record the following information: (a) the</p>	

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			<p>name and address of the pharmacist or practitioner placing the order; (b) if the order was placed on behalf of an establishment, the name and address of the establishment; (c) the date of the order; (d) the specified name or the brand name of the targeted substance ordered, as specified in the order; (e) the quantity and, if applicable, the strength per unit of the targeted substance; and (f) the name of the recording pharmacist</p>	

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Destruction	<p>Addressed in <u>Guidance Document for Pharmacists, Practitioners and Persons in Charge of Hospitals: Handling and Destruction of Unserviceable Stock Containing Narcotics, Controlled Drugs or Targeted Substances</u>¹</p> <ul style="list-style-type: none"> - no need to send to Health Canada a record of substances destroyed - “All local destructions must be witnessed by a practitioner, pharmacist, a pharmacy intern, or a pharmacy technician.” - “The record must set out the following information: <ul style="list-style-type: none"> • the brand name or common name of each narcotic, controlled drug, or targeted substance that is being destroyed; • the quantity and strength per unit of the narcotic, controlled drug, or targeted substance that is being destroyed; • the method of destruction used; and • the date that the destruction took place. <p>The record must be signed and dated by the pharmacist, practitioner or person in charge of the hospital who carried out the destruction and by the witness. Both persons must sign and print their names on a joint statement indicating that they witnessed the destruction and</p>			<p>BOTSR addresses destruction in section 2 (i.e., not in the Pharmacists section). Use that approach of creating a common section for the other regulations, noting differences as required while giving the pharmacy technician the same permission to destroy a controlled substance as pharmacists, practitioners, and persons in charge of hospitals.</p> <p>Address “open ampoules” in the</p>

¹ Guidance documents do not have the force of law.

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	<p>that the substance was altered or denatured to such an extent that its consumption was rendered impossible or improbable.</p> <p>This information must be recorded in a register similar to that required for orders involving narcotics, controlled drugs, and targeted substances, and must be retained for a period of two years, in a manner that permits an audit to be made.”</p>			<p>respective regulations (as is done in Section 2 of the BOTSR).</p>
Transfers to place of business	G.03.016 A pharmacist shall forthwith after removing, transporting or transferring a controlled drug from his place of business to any other place of business operated by him notify the Minister, setting out the details.	45 (3) A pharmacist shall forthwith after removing, transporting or transferring a narcotic from his place of business to any other place of business operated by him notify the Minister setting out the details thereof.	[unclear where or if this is addressed]	
Record keeping	G.03.001 (1) A pharmacist, on	30 A pharmacist who receives a narcotic	50 If a pharmacist receives a targeted	Use the wording in BOTSR, while giving

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	<p>receipt of a controlled drug from a licensed dealer or from another pharmacist, shall keep a record of the name and quantity of the controlled drug received by them, the name and address of the person who sold or provided it and the date it was received.</p> <p>(2) The record of information referred to in subsection (1) shall be kept (a) in a manner that permits an audit to be made; and (b) subject to subsection (3), in a</p>	<p>from a licensed dealer shall immediately enter the following in a book, register or other record maintained for such purposes: (a) the name and quantity of the narcotic received; (b) the date the narcotic was received; and (c) the name and address of the person from whom the narcotic was received</p>	<p>substance from a licensed dealer, a pharmacist in another pharmacy or a hospital, the pharmacist must keep a record of the following information: (a) the brand name of the targeted substance received or, if the targeted substance does not have a brand name, the specified name; (b) the quantity and strength per unit of the targeted substance received, the number of units per package and the number of packages; (c) the name and address of the</p>	<p>permission to pharmacy technicians to keep records.</p>

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	<p>book, register or similar record maintained exclusively for controlled drugs.</p> <p>(3) The record of information referred to in subsection (1) may, with respect to a controlled drug listed in Part II or III of the schedule to this Part, be kept in a form other than that specified in paragraph (2)(b).</p>		<p>licensed dealer, pharmacist or hospital that supplied it; and (d) the date on which it was received.</p>	
Record-keeping of Rx files	G.03.009 A pharmacist shall maintain a special prescription file in which shall be filed in sequence as to date and number all	40 (1) A pharmacist shall maintain a special narcotic prescription file in which shall be filed in sequence as to date and number all written orders or	53 A pharmacist who fills or refills a prescription for a targeted substance must record the following information:	<p>Permit the filing of both forms of prescriptions: paper and electronic (via CPOE).</p> <p>Set requirements for the secure storage of</p>

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	written orders or prescriptions in writing for controlled drugs dispensed and the written record of all controlled drugs dispensed pursuant to a prescription or order verbally given	prescriptions for narcotics dispensed and the written record of all verbal prescription narcotics dispensed pursuant to a verbal order or prescription as provided in section 39.	(a) the date the prescription was filled or refilled; (b) the quantity of the targeted substance provided at the original filling and at each refill; (c) the pharmacist's name or initials; and (d) the number assigned to the prescription. [where is the name, strength, and formulation recorded?]	electronic record keeping: secure access, back up, etc. Include pharmacy technicians
Record retention	G.03.010 A pharmacist shall retain in his possession for a	(2) A pharmacist shall retain in his possession for a period of at least two years any records	[Not in Pharmacist section] 9 The information or records required by	Present the information as in the BOTSR, applicable to licensed dealers,

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	period of at least two years, any records which he is required to keep by this Part	which he is required to keep by these Regulations.	these Regulations must be kept for a period of at least two years after (a) in the case of information, the day that the information was obtained; and (b) in the case of a record, the day that the last transaction was recorded on the record.	pharmacists, pharmacy technicians, practitioners, and hospitals
	G.03.015 A pharmacist shall immediately after receiving, selling or providing a controlled drug under paragraph G.03.014(b) or (c) or subsection G.05.003(4) enter the details of the	38 Where, pursuant to a written order or prescription, a pharmacist dispenses a narcotic, other than dextropropoxyphene or a verbal prescription narcotic, the pharmacist shall forthwith enter in a book, register or other	[A book, register, or other record is not required.]	Use the same wording in Part G and the NCR and recognise electronic records as acceptable form. Use the word “dispenses” or “selling or providing” and not “fills” or “refills”.

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	<p>transaction in a book, register or other record maintained for the purpose of recording such transactions.</p>	<p>record maintained for such purposes</p> <p>(a) the name and address of the person named in the order or prescription;</p> <p>(b) the name, quantity and form of the narcotic;</p> <p>(c) the name, initials and address of the practitioner who issued the order or prescription;</p> <p>(d) the name or initials of the pharmacist who sold or provided the narcotic;</p> <p>(e) the date on which the narcotic was sold or provided; and</p>		

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		(f) the number assigned to the order or prescription.		
Transfers to place of business	G.03.016 A pharmacist shall forthwith after removing, transporting or transferring a controlled drug from his place of business to any other place of business operated by him notify the Minister, setting out the details.	45 (3) A pharmacist shall forthwith after removing, transporting or transferring a narcotic from his place of business to any other place of business operated by him notify the Minister setting out the details thereof.	[unclear where or if this is addressed]	
Change of location/closure of pharmacy	[unclear where or if this is addressed]	[unclear where or if this is addressed]	56 A pharmacist who closes premises in which a targeted substance has been stored must, not	A pharmacist or pharmacy technician should be required to notify the Minister when the controlled

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			later than 10 days after the closure, inform the Minister of the date of closure, the location to which the targeted substance was moved and the quantity of the targeted substance that was moved.	substances are moved because the pharmacy is closed. See requirement for licensed dealers.
The Minister	G.03.017 The Minister shall provide in writing any factual information about a pharmacist that has been obtained under the Act or these Regulations to the provincial professional licensing authority responsible for the	46 The Minister shall provide in writing any factual information about a pharmacist that has been obtained under the Act or these Regulations to the provincial professional licensing authority responsible for the registration or authorization of the person to practise their	[Not in the Pharmacists section, but in Part B, The Minister.] 81 The Minister may provide in writing any factual information about a pharmacist, a practitioner or a nurse that has been obtained under the Act or these	Present the information, as in the BOTSR, in a separate section (The Minister) and make the requirement applicable to licensed dealers, pharmacists, pharmacy technicians, and practitioners.

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	<p>registration or authorization of the person to practise their profession (a) in the province in which the pharmacist is registered or entitled to practise if (i) the authority submits a written request that states the name and address of the pharmacist, a description of the information being sought and a statement that the information is required for the purpose of assisting a lawful investigation by the authority, or (ii) the</p>	<p>profession (a) in the province in which the pharmacist is registered or entitled to practise if (i) the authority submits a written request that states the name and address of the pharmacist, a description of the information being sought and a statement that the information is required for the purpose of assisting a lawful investigation by the authority, or</p>	<p>Regulations to the provincial professional licensing authority responsible for the authorization or entitlement of the person to practise their profession (a) in the province in which the pharmacist, practitioner or nurse is authorized or entitled to practise if (i) the authority submits a written request that sets out the name and address of the pharmacist, practitioner or nurse, a description of the information being sought and a</p>	

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	<p>Minister has reasonable grounds to believe that the pharmacist has (A) contravened a rule of conduct established by the authority, (B) been found guilty in a court of law of a designated drug offence or of a contravention of this Part, or (C) contravened a provision of this Part; or (b) in a province in which the pharmacist is not registered or entitled to practise, if the authority submits to the Minister (i) a written request for</p>	<p>(ii) the Minister has reasonable grounds to believe that the pharmacist has (A) contravened a rule of conduct established by the authority, (B) been found guilty in a court of law of a designated drug offence or of a contravention of these Regulations, or (C) contravened a provision of these Regulations; or (b) in a province in which the pharmacist is not registered or entitled to practise, if the authority submits to the Minister</p>	<p>statement that the information is required for the purpose of assisting a lawful investigation by the authority, or (ii) the Minister has reasonable grounds to believe that the pharmacist, practitioner or nurse has (A) contravened a rule of conduct established by the authority, (B) been found guilty in a court of law of a designated drug offence or of a contravention of these Regulations, or (C) in the case of a pharmacist or</p>	

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	<p>information that states (A) the name and address of the pharmacist, and (B) a description of the information being sought, and (ii) documentation that shows that the pharmacist has applied to that authority to practise in that province.</p>	<p>(i) a written request for information that states (A) the name and address of the pharmacist, and (B) a description of the information being sought, and (ii) documentation that shows that the pharmacist has applied to that authority to practise in that province.</p>	<p>practitioner, done any act that the Minister, on reasonable grounds, believes contravenes a provision of these Regulations; or (b) in a province in which the pharmacist, practitioner or nurse is not authorized or entitled to practise, if the authority submits to the Minister (i) a written request for information that states (A) the name and address of the pharmacist, practitioner or nurse, and (B) a</p>	

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			description of the information being sought, and (ii) documentation that shows that the pharmacist, practitioner or nurse has applied to that authority to practise in that province.	
The Minister	G.03.017.1 A pharmacist may make a written request to the Minister to send to the persons and authorities specified in subsection G.03.017.2(3) a notice, issued under section G.03.017.2, advising them that recipients of the	47 A pharmacist may make a written request to the Minister to send to the persons and authorities specified in subsection 48(3) a notice, issued under section 48, advising them of one or more of the following requirements: (a) recipients of the notice must not sell or	57 (1) A pharmacist who does not wish to receive or have possession of targeted substances may make a written request to the Minister to send to licensed dealers and pharmacies a notice, issued under section 79, that states that targeted substances	Include pharmacy technicians

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	<p>notice must not sell or provide a controlled drug other than a preparation, a preparation, or both, to that pharmacist.</p>	<p>provide a narcotic, other than a verbal prescription narcotic, to that pharmacist;</p> <p>(b) recipients of the notice must not sell or provide a verbal prescription narcotic, other than a preparation mentioned in section 36, to that pharmacist; and</p> <p>(c) the recipients of the notice must not sell or provide a preparation mentioned in section 36 to that pharmacist.</p>	<p>must not be supplied to that pharmacist.</p> <p>Prohibited actions Interdiction (2) A pharmacist must not, unless their pharmacy has received a retraction issued under section 80, (a) sell or provide a targeted substance to a pharmacist or practitioner named in a notice issued under section 79; or (b) fill a prescription or order for a targeted substance from a practitioner named in a notice issued under section 79.</p>	

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The Minister	G.03.017.2 (1) In the circumstances described in subsection (2), the Minister must issue a notice to the persons and authorities specified in subsection (3) advising them that licensed dealers and pharmacists practising in the notified pharmacies must not sell or provide to the pharmacist named in the notice a controlled drug other than a preparation, a preparation, or both.	48 (1) In the circumstances described in subsection (2), the Minister must issue a notice to the persons and authorities specified in subsection (3) advising them that licensed dealers and pharmacists practising in the notified pharmacies must not sell or provide to the pharmacist named in the notice one or more of the following: (a) a narcotic, other than a verbal prescription narcotic; (b) a verbal prescription narcotic,	[Not in the Pharmacists section, but in Part B, The Minister.] 79 (1) In the circumstances set out in subsection (2), the Minister must issue a notice to the persons and authorities specified in subsection (3) advising them that (a) licensed dealers and pharmacists practising in the notified pharmacies must not sell or provide any targeted substance to the pharmacist or the practitioner named in the notice; (b) pharmacists	Present the information, as in the BOTSR, in a separate section (The Minister) and make the requirement applicable to licensed dealers, pharmacists, pharmacy technicians, and practitioners.

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	<p>(2) The notice must be issued if the pharmacist named in the notice has (a) made a request to the Minister in accordance with section G.03.017.1 to issue the notice; (b) contravened a rule of conduct established by the provincial professional licensing authority of the province in which the pharmacist is practising and that authority has requested the Minister in writing to issue the notice; or (c) been found guilty in a court of</p>	<p>other than a preparation mentioned in section 36; or</p> <p>(3) The notice must be issued to (a) all licensed dealers; (b) all pharmacies within the province in which the pharmacist named in the notice is registered and practising; (c) the provincial professional licensing authority of the province in which the pharmacist named in the notice is registered or entitled to practise; and (d) any interested provincial professional licensing authority in another province that has made a request to the Minister to issue the notice. (4) Subject to</p>	<p>practising in the notified pharmacies must not fill a prescription or order for any targeted substance provided by the practitioner named in the notice; or (c) both paragraphs (a) and (b) apply with respect to the practitioner named in the notice.</p> <p>(2) The notice must be issued if the pharmacist or practitioner named in the notice has (a) made a request to the Minister in accordance with subsection 57(1) or section 62, as the case may be, to issue</p>	

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	<p>law of a designated drug offence or of an offence under this Part.</p> <p>(3) The notice must be issued to (a) all licensed dealers; (b) all pharmacies within the province in which the pharmacist named in the notice is registered and practising; (c) the provincial professional licensing authority of the province in which the pharmacist named in the notice is registered or entitled to practise; and (d) any interested</p>	<p>subsection (5), the Minister may issue the notice described in subsection (1) to the persons and authorities specified in subsection (3), if the Minister, on reasonable grounds, believes that the pharmacist named in the notice (a) has contravened any of the provisions of sections 30 to 45 or section 70; (b) has, on more than one occasion, self-administered a narcotic, other than a verbal prescription narcotic, contrary to accepted pharmaceutical practice; (c) has, on more than one occasion, self-</p>	<p>the notice; (b) been found, by the provincial professional licensing authority in the province in which the pharmacist or practitioner is practising, to have contravened a rule of conduct established by that authority and the authority has requested the Minister in writing to issue the notice; or (c) been found guilty in a court of law of a designated drug offence or of an offence under these Regulations.</p>	

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	<p>provincial professional licensing authority in another province that has made a request to the Minister to issue the notice.</p> <p>(4) Subject to subsection (5), the Minister may issue the notice described in subsection (1) to the persons and authorities specified in subsection (3), if the Minister, on reasonable grounds, believes that the pharmacist named in the notice (a) has contravened any of the provisions of sections G.03.001 to G.03.016; (b) has,</p>	<p>administered a verbal prescription narcotic, other than a preparation mentioned in section 36, contrary to accepted pharmaceutical practice; (d) has, on more than one occasion, provided or administered a narcotic, other than a verbal prescription narcotic, to a person who is a spouse, common-law partner, parent or child of the pharmacist, including a child adopted in fact, contrary to accepted pharmaceutical practice; (e) has, on more than one occasion, provided or</p>	<p>(3) The notice must be issued to (a) all licensed dealers; (b) all pharmacies within the province in which the pharmacist or practitioner named in the notice is authorized or entitled to practise and is practising; (c) the provincial professional licensing authority of the province in which the pharmacist or practitioner named in the notice is authorized or entitled to practise; (d) any provincial professional licensing authority</p>	

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	<p>on more than one occasion, self-administered a controlled drug, other than a preparation, contrary to accepted pharmaceutical practice; (c) has, on more than one occasion, self-administered a preparation, contrary to accepted pharmaceutical practice; (d) has, on more than one occasion, provided or administered a controlled drug, other than a preparation, to a person who is a</p>	<p>administered a verbal prescription narcotic, other than a preparation mentioned in section 36, to a person who is a spouse, common-law partner, parent or child of the pharmacist, including a child adopted in fact, contrary to accepted pharmaceutical practice; or (f) is unable to account for the quantity of narcotic for which the pharmacist was responsible under these Regulations.</p> <p>(5) In the circumstances described in subsection (4), the Minister must not issue the notice referred to in</p>	<p>in another province that has made a request to the Minister to issue the notice; and (e) any pharmacies in an adjacent province in which a prescription or order from the pharmacist or practitioner named in the notice may be filled.</p> <p>(4) Subject to subsection (5), the Minister may issue the notice described in subsection (1) to the persons and authorities specified in subsection (3), if the Minister, on reasonable grounds, believes that the pharmacist or</p>	

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	<p>spouse, common-law partner, parent or child of the pharmacist, including a child adopted in fact, contrary to accepted pharmaceutical practice; (e) has, on more than one occasion, provided or administered a preparation to a person who is a spouse, common-law partner, parent or child of the pharmacist, including a child adopted in fact, contrary to accepted pharmaceutical practice; or (f) is</p>	<p>subsection (1) until the Minister has</p> <p>(a) consulted with the provincial professional licensing authority of the province in which the pharmacist to whom the notice relates is registered or entitled to practise;</p> <p>(b) given that pharmacist an opportunity to present reasons why the notice should not be issued and considered those reasons; and</p> <p>(c) considered</p> <p>(i) the compliance history of the pharmacist in respect of the Act and the</p>	<p>practitioner named in the notice (a) has contravened a provision of the Act or the regulations;</p> <p>(b) has, on more than one occasion, self-administered a targeted substance under a self-directed prescription or order or, in the absence of a prescription or order, contrary to accepted pharmaceutical, medical, dental or veterinary practice;</p> <p>(c) has, on more than one occasion, prescribed, administered or provided a targeted substance to a</p>	

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	<p>unable to account for the quantity of controlled drug for which the pharmacist was responsible under this Part</p> <p>(5) In the circumstances described in subsection (4), the Minister must not issue the notice referred to in subsection (1) until the Minister has (a) consulted with the provincial professional licensing authority of the province in which the pharmacist to whom the notice relates is registered</p>	<p>regulations made or continued under it, and</p> <p>(ii) whether the actions of the pharmacist pose a significant security, public health or safety hazard,</p> <p>including the risk of the narcotic being diverted to an illicit market or use.</p>	<p>person who is a spouse, common-law partner, parent or child of the pharmacist or practitioner, including a child adopted in fact, contrary to accepted pharmaceutical, medical, dental or veterinary practice; or (d) is unable to account for a quantity of targeted substance for which the pharmacist or practitioner was responsible under these Regulations.</p> <p>(5) In the circumstances described in subsection (4), the Minister must not</p>	

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	<p>or entitled to practise;</p> <p>(b) given that pharmacist an opportunity to present reasons why the notice should not be issued and considered those reasons; and (c) considered (i) the compliance history of the pharmacist in respect of the Act and the regulations made or continued under it, and (ii) whether the actions of the pharmacist pose a significant security, public health or safety hazard, including the risk of the</p>		<p>issue the notice referred to in subsection (1) until the Minister has (a) consulted with the provincial professional licensing authority of the province in which the pharmacist or practitioner to whom the notice relates is authorized or entitled to practise; (b) given that pharmacist or practitioner an opportunity to present reasons why the notice should not be issued; and (c) considered (i) the compliance history of the</p>	

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	controlled drug being diverted to an illicit market or use.		pharmacist or practitioner in respect of the Act and the regulations made or continued under it, and (ii) whether the actions of the pharmacist or practitioner pose a risk to security, public health or safety, including the risk of the targeted substance being diverted to an illicit market or use.	
The Minister	G.03.017.3 The Minister must provide the licensed dealers, pharmacies and provincial professional licensing authorities who were issued a	49 The Minister must provide the licensed dealers, pharmacies and provincial professional licensing authorities who were issued a notice under subsection 48(1) with a	[Not in the Pharmacists section, but in Part B, The Minister.] 80 The Minister must provide the licensed dealers, pharmacies and	Present the information, as in the BOTSR, in a separate section (The Minister) and make the requirement applicable to licensed dealers, pharmacists,

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	notice under subsection G.03.017.2(1) with a notice of retraction of that notice if (a) in the circumstance described in paragraph G.03.017.2(2)(a), the requirements set out in subparagraphs (b)(i) and (ii) have been met and one year has elapsed since the notice was issued by the Minister; or (b) in a circumstance described in any of paragraphs G.03.017.2(2)(b) and (c) and (4)(a) to (f), the pharmacist named in the notice	notice of retraction of that notice if (a) in the circumstance described in paragraph 48(2)(a), the requirements set out in subparagraphs (b)(i) and (ii) have been met and one year has elapsed since the notice was issued by the Minister; or (b) in a circumstance described in any of paragraphs 48(2)(b) and (c) and (4)(a) to (f), the pharmacist named in the notice has (i) requested in writing that a retraction of the notice be issued, and (ii) provided a letter from the provincial professional licensing authority of the province, in which the	provincial professional licensing authorities who were sent a notice under subsection 79(1) with a retraction of that notice if (a) in the circumstance described in paragraph 79(2)(a), the requirements set out in subparagraphs (b)(i) and (ii) have been met and one year has elapsed since the notice was sent by the Minister; or (b) in the circumstance described in any of paragraphs 79(2)(b) and (c) and (4)(a) to (d), the pharmacist	pharmacy technicians, and practitioners.

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	has (i) requested in writing that a retraction of the notice be issued, and (ii) provided a letter from the provincial professional licensing authority of the province in which the pharmacist is registered or entitled to practise, in which the authority consents to the retraction of the notice.	pharmacist is registered or entitled to practise, in which the authority consents to the retraction of the notice.	or the practitioner named in the notice has (i) requested in writing that a retraction of the notice be issued, and (ii) provided a letter from the provincial professional licensing authority of the province in which the pharmacist or practitioner is authorized or entitled to practise in which the authority consents to the retraction of the notice.	