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RE: Consultation on the guidance on the handling and destruction of unserviceable stock and post-consumer returns

On behalf of the Pharmacy Technician Society of Alberta (PTSA) and the Provincial Representatives Working Group of pharmacy technicians supported by the Canadian Association of Pharmacy Technicians (CAPT), I am pleased to provide comment on the guidance documents to support the handling of drugs returned to pharmacies, and the destruction of unusable stock. The following feedback on three areas of the documents is provided for your consideration.

1. Reference to regulated pharmacy technicians

We are encouraged to see the inclusion of pharmacy technicians within the documents. Notwithstanding the value of these references in practice, the documents do not provide adequate guidance for the practice of regulated pharmacy technicians in this area. For many years, pharmacy technicians have taken a lead role in all narcotic, controlled drug management activities in pharmacies and hospitals. With the regulation of pharmacy technicians in recent years, the roles being performed and responsibility undertaken by pharmacy technicians has further changed. Currently there are nine (9) provinces where pharmacy technicians are regulated – British Columbia, Alberta, Saskatchewan, Manitoba, Ontario, New Brunswick, Nova Scotia, Prince Edward Island and Newfoundland. There are approximately 7000 regulated pharmacy technicians in Canada and this number continues to rise.

For clarity, “pharmacy technician” should be specifically defined within related legislation; however, we believe that pharmacy technicians fall under the current definition of “pharmacist” within the following regulations:

- ***Narcotic Control Regulations*** for the purpose of subsection 2(2), sections 3, 31 to 39, subsections 44(1), 45(1) and (2), section 46 and subsections 65(3) to (4) as a person who is registered or otherwise entitled under the laws of a province to practise pharmacy and who is practising pharmacy in that province.
- ***Benzodiazepines and Other Targeted Substances Regulations*** and ***Precursor Control Regulations*** as an individual who is registered or otherwise authorized under the laws of a province to practise pharmacy and is practising pharmacy in that province.
- ***Part G of the Food and Drug Regulations*** as a person who is registered and entitled under the laws of a province to practise pharmacy and who is practising pharmacy under those laws in that province.

While pharmacists are still involved in ensuring procedures are followed for the handling of controlled substances, the [Model Standards of Practice for Canadian Pharmacy Technicians](#) specifically refers to the role pharmacy technicians have in the “disposing of, destroying or returning expired, unusable or recalled drugs” (29.g).

In consideration of the alignment with current practice and legislated definitions, the guidance documents should be revised to also include reference to a regulated pharmacy technician each time a pharmacist is named. In the absence of recognition of regulated pharmacy technicians as responsible for handling of post-consumer returns and unserviceable stock, the activities required for local destruction should be able to be delegated by a pharmacist, or person in charge of a hospital, to a regulated pharmacy technician.

2. Requirements for storage of post-consumer returns

The recommendations outlined in section 3.3 Storage of the *Handling and Destruction of Post-Consumer Returns Containing Narcotics, Controlled Drugs, Targeted Substances* document are unclear.

Pharmacy professionals should be responsible for ensuring collection containers used to store post-consumer returns are secured and are inaccessible by non-pharmacy personnel; however, inner liners should not be required.

Since this practice could have a significant impact to pharmacy professionals' ability to accept and dispose of post-consumer returns containing narcotics, controlled drugs, and targeted substances, it should be clarified that it is suggested but not required. Additionally, the procedure of placing post-consumer returns into a collection container so that they cannot be removed does not appear to allow for local destruction to be completed.

3. Procedure for destruction

Allowing the destruction of controlled substances to be completed along with other prescription or non-prescription medications is a positive change. The Procedure for Destruction (section 4.1) in the guidance for post-consumer returns does not adequately clarify that the same destruction of unserviceable stock requirements (e.g. witness and documentation) are not required. A statement to this effect will improve the end-user's experience.

I look forward to the availability of the documents revised to provide the necessary clarity to the points noted above. Please don't hesitate to contact me if you have questions.

Kindest Regards,

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