

July 15, 2016

Executive Officer, Ontario Public Drug Programs  
Ministry of Health and Long-Term Care  
80 Grosvenor St., 9th Floor  
Hepburn Block, Queen's Park  
Toronto, ON M7A 1R3

**Re: Request for feedback on the proposed regulations under the Safeguarding our Communities Act (Patch for Patch Return Policy), 2015**

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Dear Executive Officer,

The Ontario Branch of the Canadian Society of Hospital Pharmacists (CSHP-OB) welcomes the opportunity to provide feedback regarding the proposed regulations under the Safeguarding our Communities Act (Patch for Patch Return Policy), 2015.

Although hospital dispensers are exempt from the regulations, CSHP-OB would like to acknowledge our full support of the regulations to provide new requirements for both prescribers and dispensers of fentanyl patches in order to address the issues of abuse, misuse and diversion of fentanyl patches. The success of the initial voluntary Patch for Patch program started in North Bay has demonstrated the benefits for community and patient safety.

It is our understanding that hospitals have already established sound medication management systems for collection and administration of fentanyl patches and other controlled substances. We do not believe there will be any significant issues that would prevent hospitals from achieving full compliance with the regulations. It should be noted that the collection of used fentanyl patches may be completed by services other than hospital pharmacy departments, as many hospitals contract out pharmaceutical waste management services. We anticipate no changes will be required with these established processes for management of pharmaceutical waste.

CSHP-OB would like to recommend that the regulations be modified so that other controlled substances in a patch format be included under this legislation. For instance, buprenorphine is currently available in an extended release patch. With implementation of the new regulations for fentanyl patches, there could be potential for abuse of the buprenorphine patches without the same prescribing/dispensing requirements. Also, a hydromorphone based transdermal patch was being developed by an American pharmaceutical company and at some point may be available in the Canadian marketplace. We anticipate no changes will be required with these established processes for management of pharmaceutical waste which have been developed with input from the Pharmacy Departments.

We hope our feedback will be of value to the Ministry. Please do not hesitate to reach out for further questions or clarifications regarding our feedback.

Respectfully submitted on behalf of CSHP-OB executive and council,



Sammu Dhaliwall  
President, Canadian Society of Hospital Pharmacists – Ontario Branch

