

# Pharmaceutical Supply and Drug Shortages

## Neighbourhood Pharmacies' Position:

- Drug shortages place a burden on patients and healthcare providers. Stakeholders should work together to avoid and mitigate drug shortages. The effects of a drug shortage on a patient can range from a minor inconvenience to a major health threat. We encourage ongoing dialogue and collaboration between all stakeholders, including Health Canada's Multi-Stakeholder Steering Committee on Drug Shortages, to:
  - Help prevent the occurrence of drug shortages
  - Mitigate the harm to patients from drug shortages
  - Develop policies that lead to a more robust, sustainable pharmaceutical supply chain.
- Pharmacists dedicate many hours to managing drug shortages for their patients. While necessary, it detracts from the time pharmacists can spend on direct patient care. The pharmacist's time spent on drug shortages is not compensated and should be recognized by payors.
- Using their scope of practice for therapeutic substitution (except in Ontario, Manitoba, Nunavut, and Northwest Territories), pharmacists adjust prescriptions to therapeutic alternatives, ensuring shortages do not disrupt patient care. All provinces should enable therapeutic substitutions by pharmacists to best support them in providing continuity of care.
- Canada's pharmaceutical supply system is designed and carefully managed to serve our population of approximately 36 million people. We encourage Health Canada to maintain a vigilant eye on the drug supply and take the necessary measures to prevent drug shortages.
- Export of Canadian medications to the United States increases the risk of drug shortages and should be discouraged for this reason. We encourage Health Canada to exercise its Interim Order powers as necessary, and for the Government of Canada to take a whole-of-government approach to prevent drug shortages caused by U.S. importation, including border enforcement. Canada does not have the capacity to support the drug supply needs of the United States' population.



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The over 1,000 drug shortages reported to Health Canada each year[1] affect the quality of healthcare Canadians receive. Shortages lead to an increase in harmful medication safety incidents.[2] They can also confuse patients and lead to adverse outcomes, including non-compliance and incorrect medication use.[3] In the past three years, one in four Canadians experienced or know someone who experienced a drug shortage,[4] with 10 to 15 per cent of Canadian drugs reported in short supply at any given time.[5]

Pharmacies, drug manufacturers, and pharmaceutical distributors play a critical role in managing Canada's drug supply. They work collaboratively, communicating regularly with government to address concerns. When manufacturers alert of a potential shortage, pharmaceutical distributors can mitigate by acting as a buffer with their inventory, distributing remaining supply, and substituting equitably on a priority basis. [6] Pharmacists track shortages and work with physicians to identify and provide appropriate drug therapy alternatives (e.g., therapeutic substitutions) to ensure patients receive the best possible care.[7] Communication with stakeholders, early identification of potential shortages, and equipping pharmacists with the scope to provide therapeutic substitutions help ensure continuity of care.[8]

Recurring drug shortages threaten the continuity of patient care and medication therapy.[9] Pharmacists spend hours managing drug shortages for their patients. While this effort is necessary, it detracts from the time pharmacists can allocate to direct patient care. Ultimately, this is an inefficient use of healthcare resources and a hidden cost that does not benefit patients.

Pan-Canadian entities such as the Provincial/Territorial Drug Shortages Task Team (PT DSTT) should consult with pharmacy representatives when developing policies that could affect the pharmaceutical supply chain, to reduce the risk of unintended consequences to patients. A robust, resilient supply chain that is less susceptible to drug shortages should be a standing goal for policymakers.



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Canada does not have the capacity to support the drug supply needs of the United States' population.[10] Furthermore, importation of Canadian medications will not help lower medication costs in the U.S.[11] Therefore, it is essential to implement strong legal and contractual provisions to protect the Canadian medication supply chain and prevent a significant increase in Canada's drug shortages.[12]

Over the past several years, drug shortages have become an increasingly serious concern in the Canadian healthcare system. Pharmacies should be involved in the discussion early, to understand supply challenges and find alternatives.[13] Early identification of potential shortages, communication with stakeholders, and equipping pharmacists with the scope to provide therapeutic substitutions will ensure continuity of care for Canadians.

## Pharmaceutical Demand & Preserving the Supply Chain

*Patients rely on pharmacies for their medications and require timely access to medications, even when there are shortages. During the COVID-19 pandemic, the demand for pharmaceuticals increased by over 150 per cent. The uncertainty of the pandemic and global lockdowns affecting manufacturing capacity resulted in various drug shortages. Pharmacies quickly adopted measures to support government initiatives aimed at preserving the pharmaceutical supply chain. [14]*



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## References:

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- [4] Canadian Pharmacists Association. Drug Shortages. <https://www.pharmacists.ca/advocacy/drug-shortages/>
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- [11] Canadian Multi-Stakeholder Response to Proposed Rulemaking titled "Importation of Prescription Drugs," Docket No. FDA-2019-N-5711. Canadian Association for Pharmacy Distribution Management. <https://www.capdm.ca/CAP/media/Images/News/Canadian-Multi-Stakeholder-Response-to-Importation-of-Prescription-Drugs.pdf>, p.2.
- [12] Canadian Multi-Stakeholder Response to Proposed Rulemaking titled "Importation of Prescription Drugs," Docket No. FDA-2019-N-5711. Canadian Association for Pharmacy Distribution Management. <https://www.capdm.ca/CAP/media/Images/News/Canadian-Multi-Stakeholder-Response-to-Importation-of-Prescription-Drugs.pdf>, p.2.
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