



CANADIAN
PHARMACISTS
ASSOCIATION
ASSOCIATION DES
PHARMACIENS
DU CANADA

May 11, 2004

Dr. Richard H. Carmona
Ch' Task Force on Drug Importation
U.S. Department of Health and Human Services
200 Independence Avenue, S.W.
Washington, D.C.20201

Dear DrCarmona

The Canadian Pharmacists Association is the national, voluntary organization that represents pharmacists in Canada in all areas of practice. We have members in community practice, hospitals, academia and industry. Also, we have close to 2,000 student members. We were unable to come to Washington to present on the dates that were available for international presentations. Therefore, we are sending a written submission. If the hearings are extended and dates become available after May 27, then we would be interested in a personal hearing.

Since 2000, the Association has published three statements relating to Internet pharmacy and the cross-border drug trade (see attached). In 2000, our statement gave warning to consumers to take care when buying medications on the Internet and warned pharmacists of legal issues involved in selling drugs and other services via websites.

In 2003, we had seen the emergence and growth of international prescription services, particularly from the province of Manitoba to the United States. At that time, we had major concerns around the quality of care, ethical issues and the ongoing impact that this trade was having on patient care in Manitoba. With further growth in the trade, our Board of Directors published its third statement in 2004 taking a much tougher stance. This reflects very real concerns that ongoing growth in this trade will have a serious negative impact on Canadians.

Our concerns focus in three areas.

- The trade is undermining the Canadian system of price control that has allowed Canadians access to medications at an affordable cost while at the same time maintaining a viable brand and generic pharmaceutical industry. The trade threatens further development of our drug benefit plans since price increases (within allowable parameters) will likely eat up money allocated by government to expand these programs.
- We are concerned about the ongoing consequence of this trade on Canadians access to medications. We have numerous anecdotal reports of shortages. Seventy-five per cent of pharmacists in a recent survey responded that the shortage situation was worse than last year. We also have reports of companies' decisions not to launch or not to license products in Canada since the trade could undermine the market for these products in the U.S.

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~ Our third reason concerns the impact of the trade on Canadians ability to access care. We have a significant shortage of pharmacists and physicians. While these health care professionals are engaged in providing services to U.S. patients, they are not available to serve Canadians.

While we are primarily concerned with impact on Canadians, we also see a potential for negative consequences for U.S. patients. These are:

- fragmentation of care (i.e. multiple pharmacies and physicians involved in. care) leading to increased risk of harm
- violation of US privacy law by overseas call centres
- bypassing the safety net established by the U.S. drug regulatory system
- risks arising from generic substitution of Canadian products for U.S. brands
- the large profit incentives leading to the sourcing of products from dubious external sources
- the level of liability protection for U.S. patients should problems arise.

Every major health care association and voluntary disease society in Canada opposes this trade, since it is very clear that any growth in this trade particularly through reimportation legislation would have disastrous consequences for (Canadians. We do not have a lake of pharmaceuticals. It is completely unrealistic to expect that the pharmaceutical supply model established to meet the needs of 30 million people can meet the needs of the elderly population of the D.S. The government of the U.S. must take action to blend its favourable industrial policy toward the pharmaceutical industry with a social policy that ensures that all of its citizens have access to affordable medications.

Your s sincerely

A handwritten signature in black ink that reads "Jeff Poston". The signature is written in a cursive, somewhat stylized font.

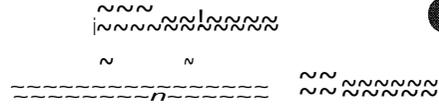
Jeff Poston, PhD, MRPbuzzoS.
Executive Director

Encl.

cc: His Excellency Paul Cellucci, United States Ambassador to Canada
Honourable Pierre S. Pettigrew, Minister of Health
Honourable Lucienne Robillard, Minister of Industry
Honourable James Peterson, Minister of International Trade



Position



Cross-Border Trade

CPhA Position

- 0 The Canadian Pharmacists Association (CPhA) opposes the cross-border prescription drug trade based upon our concerns of the negative impact of this trade on Canadians, including access to quality care, access to prescription drugs and the threat to drug prices in Canada. The health and safety of patients is the overriding principle upon which this position is based
- 0 CPhA believes that face-to-face communication between patients and pharmacists builds a relationship that is critical to the successful management of drug therapy and is a key element of the expanded role of pharmacists on the primary health care team. CPhA opposes cross border prescription sales where the patient does not have a relationship with the Canadian pharmacist and prescriber because patient care may be compromised. A relationship between the patient and the pharmacist is essential for medication management and to ensure that patients understand how to use their drugs safely and effectively. Pharmacists need to practice in a setting that allows them to assess and advise on the appropriate, effective and safe Use of pharmaceuticals based on the patient's medication history and other relevant information.
- P CPhA encourages the federal government to explore options for action on the National Association of Pharmacy Regulatory Authorities' call on the government to ban exporting of drugs from Canadian pharmacies to citizens of other countries until such time as governments can implement systems that will ensure the effective regulation of these practices to protect public safety.
- 0 [PhAsupports the position of the Canadian Medical Association in its Statement on Internet Prescribing which states "It is incumbent upon the physician to obtain an adequate history and perform an appropriate physical examination to reach a diagnosis which will ensure that the prescribed medications are appropriate. It is not acceptable for a physician to sign a prescription without properly assessing the patient".
- P CPhA endorses the position that all pharmacies operating in Canada, including those that provide distance dispensing or offer prescription drug services over the Internet, must comply with federal/provincial/territorial legal and regulatory requirements as well as meet established standards of practice for patient care and dispensing.

Background

Prescription drug trade is a component of the health care system. Pharmacists seek to ensure that patients use their medications safely and appropriately to improve their quality of life. Simultaneous with calls for an expanded role for pharmacists within the Canadian health care system has been the rapid growth of the cross-border prescription drug trade in Canada. The export of prescriptions is not consistent with CPhA's vision of contemporary and future pharmacy practice.

Increasingly, Canadian pharmacies are using the Internet to market their services for dispensing of prescription drugs for export to citizens of the United States and other countries. Some others use a "store front" intermediary or other means to market their services. This trade is now estimated at over \$1 billion annually. Much of this growth is driven by the demand for pharmaceuticals between Canada and the US, coupled with the fact that many American seniors do not have a comprehensive drug benefits plan.

This document addresses CPhA's position regarding prescription drugs dispensed to residents of foreign countries where prescriptions are dispensed and delivered to patients; (or their agents) who do not physically attend the Canadian pharmacy. Further related information, including regulation of Internet pharmacy sites, potential benefits and risks, recommendations for future work, and preferred conditions for the distant provision of pharmaceuticals to Canadians can be found in CPhA's Statement on Distance Provision of Pharmaceuticals.



Concerns with the Cross-Border Prescription Drug Trade

Dispensing of prescriptions to a foreign pharmaceutical market 20 times our size is bound to have an impact on the Canadian health care system. Canadian pharmaceutical and health human resources are finite and the delivery of those same services to US citizens cannot continue to grow simultaneously. If Canadian resources are increasingly being diverted, they cannot also remain available to Canadians. It is for these reasons that CPhA is very concerned about the effects of cross-border drug sales.

Specific concerns include:

1. This trade has resulted in rising drug prices in Canada. There are growing calls coming from US legislators and drug manufacturers for prices to increase in Canada. Drugs are the second highest health care expenditure in Canada, with prescription drugs forecasted at \$175 billion annually. Even small price increases will put increased pressure on governments, private health plans and individual Canadians.
2. This trade may have a negative impact on the pharmaceutical supply chain in Canada. With pharmaceutical manufacturers placing caps on the amount of drugs shipped in Canada and an increasing volume of prescription drugs being exported, there is a strong potential for drug shortages. There is also the possibility of manufacturers delaying marketing of breakthrough drugs in Canada.
3. The number of pharmacists dedicated to filling prescriptions and providing care to patients located outside of Canada could impact on the current shortage of pharmacists across the country and negatively affect the provision of services to Canadian patients.
4. Some Internet sites operate illegally and services are not provided by accredited pharmacies. These bypass the comprehensive safety system of drug approval, prescription requirements and pharmacy practice standards. People who purchase drugs from the operators of such sites are at risk of adverse effects from inappropriately prescribed drugs, drug interactions, contaminated, counterfeit or subpotent drugs, or unapproved drugs for which safety and efficacy have not been established.
5. Some pharmacies operating an Internet pharmacy service may not be in compliance with medical and pharmacy standards of practice. Purchasing drugs over the internet bypasses the opportunity for face-to-face consultation with a pharmacist, physician or other health care provider. Internet pharmacies may not have complete profiles of patients' drugs and allergies, limiting the ability of the pharmacist to monitor drug therapy, including drug interactions and allergies.
6. The professional ethics of some practices is questionable. For example, remunerating physicians for co-signing prescriptions without having examined the patient; requiring patients to sign a waiver, release or power of attorney to access the services. Cross-border prescription services violate US federal laws. Many of the US states have legislation that requires a pharmacist or the pharmacy to be licensed in the state to dispense drugs to its citizens.
7. The drug distribution process may be compromised (e.g., bulk/stock bottles dispensed without safety caps, improper labelling, storage and handling).
8. Pharmacies providing cross-border prescription services are facing increased challenges in obtaining stock of some products. Other pharmacies are being asked to order extra stock to ship to them. There are also reports of drugs which have not been approved by Health Canada being imported into Canada for export to the US, which increases the potential for contaminated, counterfeit or subpotent drugs.
9. Prescriptions are often faxed, and could be faxed to multiple online pharmacies, thereby increasing the potential for drug diversion and illicit drug use.
10. The growing number of Canadian pharmacies exporting prescription drugs and the co-signing practices of physicians is creating regulatory and resource challenges for provincial pharmacy and medical licensing authorities. The federal and provincial regulatory systems in Canada were designed to protect the safety of Canadians in the context of the Canadian health care system and were not designed to regulate the export of prescription drugs.



CPhA POSITION ON INTERNATIONAL PRESCRIPTION SERVICES AND DISTANCE PROVISION OF PHARMACEUTICALS

- vi* The health and safety of patients is the overriding principle upon which this position is based. A relationship between the patient and pharmacist is essential for medication management and to ensure that patients understand how to use their medications safely and effectively. Pharmacists need to practise in a setting that allows them to assess and advise on the appropriate, effective and safe use of pharmaceuticals based on the patient's medication history and other relevant information.
- The Canadian Pharmacists Association (CPhA) believes that face-to-face communication between patients and pharmacists builds a relationship that is critical to the optimal management of drug therapy and is a key element of the expanded role of pharmacists on the primary health care team.
 - The Canadian Pharmacists Association endorses the position that all pharmacies operating in Canada, including those that provide distance dispensing or offer prescription drug services over the Internet, must comply with federal/provincial/territorial legal and regulatory requirements as well as meet established standards of practice for patient care and dispensing.
 - The Canadian Pharmacists Association recognizes that the distance provision of pharmacy services from licensed pharmacists that comply with standards of practice for patient care and meet regulatory requirements benefits Canadians and provide opportunities for patients to receive pharmacy services from a distance, particularly those who live in rural and remote areas with limited access to a pharmacy. The Association's position on conditions that must be met for the distance provision of pharmaceuticals is detailed in Appendix IV.
 - ¹¹ The Canadian Pharmacists Association opposes international prescription services where the patient does not have a relationship with the pharmacist and the prescriber, because patient care may be compromised. CPhA also opposes international prescription services if such services violate laws in the jurisdiction in which the patient resides.

RECOMMENDATION U

- That CPhA continue to work with the National Association of Pharmacy Regulatory Authorities (NAPRA), pharmacy and medical organizations and regulatory authorities, international pharmacy service associations, Health Canada, the United States Food and Drug Administration, the US National Association of Boards of Pharmacy (NABP), policing agencies and others, as appropriate, in initiatives designed to protect the consumer.
- That CPhA support NAPRA's work to provide consumer protection by developing an identifying "seal of approval" and consumer awareness program for legitimate Canadian pharmacies offering pharmacy services via the Internet, in collaboration with the VIPPS (Verified Internet Pharmacy Practice Sites) program by the NABP.
- That further work be done to develop standards and security for the electronic transmission of patient data, with respect to online transmission of prescriptions and other health information between prescribers and pharmacists.
- That CPhA help pharmacists keep pace with future technology and health informatics innovations.



APPENDIX 1:

Regulation of Internet Pharmacy Sites

In Canada, pharmacy practice is regulated provincially and territorially. In Canada, the National Association of Pharmacy Regulatory Authorities (NAPRA) has approved "Model Standards for Canadian Pharmacists Offering Pharmacy Services via the Internet" (November 2001, www.napra.org), and many provincial pharmacy regulatory authorities have or are in developing positions. In general, these require that pharmacists provide professional services in accordance with established standards of practice. Presently, online prescribing or electronic transmission of prescriptions is not permitted.

NAPRA is working with the US National Association of Boards of Pharmacy (NABP) to provide better consumer protection by developing an identifying "seal of approval" program (based on the US VIPPS program -- Verified Internet Pharmacy Practice Sites) and a consumer awareness program for legitimate Canadian Internet pharmacy sites. NABP has released a position paper on the importation of foreign prescription drugs (March 2003; www.nabp.net). NAPRA and NABP have issued a joint cross border communique regarding the international movement of prescription drugs between Canada and the US (May 2003; www.napra.org), which was endorsed by CPhA and the American Pharmacists Association (APhA).

The United States Food and Drug Administration (FDA) is concerned with the lack of control of so-called Internet pharmacy sites and is working to implement federal requirements (www.fda.gov/oc/buyonline). Of particular concern is the illegal sale of prescription drugs without a prescription, unapproved new drugs, health fraud and counterfeit medications. The FDA sends warning cyberletters to suspicious sites.

The FDA has laws preventing Americans from reimporting medications that have been manufactured in the US and imported back into the US. FDA's personal use guidance also states that "medication cannot be imported into the US unless it is to treat a life threatening illness and the medication is not available in the US". Nevertheless, US Customs Service officials often allow Americans to import up to 90 days' supply of medications for personal use. Many US states require out-of-state pharmacies to register with state boards of pharmacy if they serve residents of that state.

APPENDIX 11:

Potential Benefits of Online Pharmacy Services

The Canadian Pharmacists Association recognizes that online pharmacy services may provide benefits to consumers, including:

• consumer access to drug and related health information, empowering them to take greater responsibility for their own health. Many online pharmacy sites have reliable health information and links to online medical libraries, government agencies and health associations. This information can be helpful when consulting with a pharmacist, physician or other health care provider about a disease or condition.

• convenience in obtaining information, products, services and price comparison, in particular for seniors, people with disabilities, or people who are home-bound or live in rural and remote areas,

- an opportunity for consumers to order products and contact a pharmacist from the privacy of their homes.

APPENDIX III:

Potential Risks and Concerns With Prescription Drug Services Offered Over The Internet

The following concerns have been raised about Internet sites operating in Canada that offer prescription drug dispensing services, in particular those that dispense pharmaceuticals for export to the United States and other countries:

- Some Internet sites operate illegally and services are not provided by accredited pharmacies. These bypass the comprehensive safety system of premarket drug approval, prescription requirements, patient assessment by a practitioner and pharmacy practice standards. People who purchase medications from the operators of such sites are at risk of adverse effects from inappropriately prescribed medications, drug interactions, contaminated, counterfeit or subpotent drugs, or unapproved drugs for which safety and efficacy have not been established.
- Some pharmacies operating an Internet pharmacy service may not be in compliance with medical and pharmacy standards of practice. Purchasing medications over the Internet bypasses the opportunity for face-to-face consultation with a pharmacist, physician or other health care provider.
- The drug distribution process may be compromised (e.g., bulk/stock bottles dispensed without safety caps, improper labelling, storage and handling).
- III Prescriptions are often faxed, and could be faxed to multiple online pharmacies, thereby increasing the potential for drug diversion and illicit drug use.
- Internet pharmacies may not have complete profiles of patients' medications and allergies, limiting the ability for the pharmacist to monitor drug therapy, including drug interactions and allergies.
- Some Internet pharmacies require that a patient or agent of be patient sign a waiver or release of any ethical or legal obligation of the pharmacist as a condition of providing a pharmaceutical service to the patient. Others require the signing of a "power of attorney", giving the pharmacy the ability to act as "the patient". Such practices may undermine accountability, which is a key element of the pharmacist-patient relationship.
- Prescriptions might be issued by a Canadian physician based on prescription and medical information forwarded to them, without speaking to the patient or the foreign prescriber. Physicians may be remunerated for this either directly from the patient, from the pharmacy or through an intermediary. Medical regulatory agencies have informed their members that the practice of co-signing prescriptions



without having examined the patient may be considered professional misconduct. Standards of good medical practice require that a physician should not prescribe unless he or she has an appropriate relationship with the patient to permit the physician to form a professional opinion that a prescription is required and appropriate.

- Liability insurance may not cover such practices. The Canadian Medical Protective Association (CMPA) is a mutual defence organization for Canadian physicians. The CMPA has cautioned Canadian physicians about co-signing foreign prescriptions and warned of the potential for liability in the foreign jurisdiction resulting from an alleged doctor-patient relationship that could result from such action. In the event of an American or other foreign lawsuit a physician may not be eligible for help from the CMPA. [MR4 advises its members not to participate in such activities.]
- Some provincial pharmacy regulations require that the pharmacist not contravene a law in the jurisdiction where the patient resides. Many of the US states have legislation that requires a pharmacist or the pharmacy to be licensed in the state to dispense drugs to its citizens and the FDA has indicated that the importation of prescription drugs is illegal.
- The number of pharmacists dedicated to filling prescriptions and providing care to patients located outside Canada could impact the current shortage of pharmacists across Canada and negatively affect the provision of services to Canadian patients.
- The privacy and confidentiality of financial and patient health information may be compromised on some sites.
- There has been speculation that there may be short- and long-term implications for the cost of and access to medications in Canada

APPENDIX IV:

CPhNs Position on Preferred Conditions for the Distance Provision of Pharmaceuticals

The position of the Canadian Pharmacists Association is that the following conditions must be met for the distance provision of pharmaceuticals, including those offered on the Internet:

- Distance pharmacy services must be provided within the federal/provincial/territorial legal and regulatory framework for pharmacy practice. This includes standards of practice related to Schedule 1, 11* and III drugs (e.g., the pharmacist must ensure that the prescription is authentic, accurate, complete and appropriate, and effectively counsel patients about their prescription medications; the pharmacist must

make the decision to sell Schedule 11 drug products; and must be available for consultation regarding Schedule III drugs). [* Note: international sales of codeine-containing analgesics may violate international narcotics control regulations and result in severe penalties].

- Where a pharmacist does not have face-to-face communication with a patient, the pharmacist must ensure that he or she forms a relationship directly with the patient by other means. If a patient's health or disability makes it impossible for the pharmacist to form a relationship with the patient, the pharmacist must form the relationship with the patient's caregiver so that the patient receives the benefits of that relationship. The patient should be advised to consult a pharmacist, physician or other health care provider if the patient's interests would be better served by a face-to-face consultation.
- A pharmacist must not be party to or associate him or herself with any arrangement in which a physician issues or co-signs a prescription and in which the physician receives compensation directly or indirectly from the pharmacy,
- A pharmacist must not dispense a drug if he or she knows or should know that the prescriber has not complied with the prescriber's legal duties or required standards of practice in relation to that prescription.
- A pharmacist must not request or require that a patient or agent of the patient sign a waiver or release of any ethical or legal obligation of the pharmacist as a condition of providing a pharmaceutical service to the client.
- The pharmacist must ensure that drug and health care information provided on a pharmacy website is of a high professional standard. If specific recommendations are made, the pharmacist should ensure that the patient or caregiver receives the appropriate information about use, precautions, adverse effects, etc. Website information must not be in violation of federal or provincial laws regarding advertising.

The confidentiality and integrity of the patient's personal health and financial information must be protected. Patient data transmissions should be encrypted to prevent the possibility of access by the Internet service provider or any other unauthorized party.

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With the rapid growth of on-line pharmacies over the past few years, there is an increasing concern that they will be able to bypass the existing public protection system to be bypassed by illegitimate operators or unaccredited pharmacies. This could expose the public to harmful or ineffective drugs, improper prescribing or dispensing of pharmaceuticals. The Canadian Pharmacists Association (PhA) recognizes that online pharmacy services from reputable pharmacies can benefit consumers and provide innovative opportunities for pharmacies to serve their patients electronically. PhA has produced these interim guidelines for pharmacists who wish to provide internet pharmacy services and for the consumers of such services. This issue is also of concern to government agencies, pharmacy and medical regulatory authorities, and policing agencies. These guidelines will be updated as e-commerce and the regulatory framework evolve.

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At present, online prescription services from Canadian pharmacies are limited in number. These are linked to existing brick and mortar pharmacies. Pharmacies that do provide internet access generally offer two types of services:

- An information site providing consumer information on medications, wellness and disease management
- An internet shopping site offering a range of products including non-prescription drugs, speciality compounds, home health care products, cosmetics, etc. Orders can be picked up, delivered as part of the pharmacy's home delivery service, or mailed.

In 1997, Health Canada launched its own consumer health care gateway to internet resources, the Canadian Health Network (CHN), www.canadian-health-network.ca.

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The Food and Drug Administration (FDA) estimates that there are approximately 200 internet pharmacy sites operating in the U.S. with the number increasing rapidly. The biggest sites are CornerDrugStore.com, drugstone.com, K4erckK4edco.com and PlanetRx.com. It is predicted that annual drug sales on the internet

will increase by 1,000% over the next three years (McLennan, 1997). The highest percentage of internet pharmacies emerging in the U.S. are:

- Limited service pharmacies providing a very limited number of selected drugs (e.g. sildenafil, finasteride, orlistat). Some of these sites are offshore, increasing the potential to avoid state and federal regulations. In some, prescription medications are supplied without a prescription or supplied after an online medical consultation resulting from a request for a medication. Such practices make these high-risk sites for consumers.

- Websites of existing regulated brick and mortar pharmacies may offer a range of services, including internet shopping (e.g. prescription and non-prescription medications, home health care products, non-drug merchandise) and provision of drug information, consumer health information or disease management advice.

- Full service virtual pharmacies (e.g., drugs.com) which may be linked to a large chain and/or large pharmacy benefit management company and be part of a fully integrated system from prescriber to pharmacist to patient. Drugs are delivered via mail or supplied for pick-up from a chain pharmacy.

The initial surge of enthusiasm for internet pharmacies has declined because of slow uptake by consumers and significant early financial losses.

0 Provides an opportunity for consumers to order products and consult with a pharmacist in the privacy of their own homes.

For many Canadians, Internet pharmacies, as a source of supply of product, are unlikely to offer significant economic advantages or convenience over the services available from a community pharmacy. In particular, pharmacists need to assess the patient's need for face-to-face dialogue with respect to Schedule 1, 11 and III medications.

POTENTIAL RISKS OF ON-LINE PHARMACIES

0 Internet pharmacies can bypass safeguards. Some sites may operate illegally, thereby bypassing the comprehensive safety system of pre-market drug approval, prescription drug designation, evaluation of the patient by a practitioner and pharmacy practice standards. People who purchase medications from such sites are at risk for adverse effects from inappropriately prescribed medications, drug interactions, contaminated or sub-potent drugs, or unapproved drugs where safety and efficacy have not been established.

0 Purchasing medications over the Internet bypasses the opportunity for face-to-face consultation with a pharmacist, physician or other health care provider.

P Increases the risk of forged prescriptions being used.

P Some sites promise deep discounts. In fact, on-line prices for some products may be higher even without the additional delivery costs.

INTERNET PHARMACY SITES IN CANADA

The following points are presented to guide pharmacists who currently provide on-line pharmacy services, or for those who are considering providing them:

~ On-line pharmacy services must be provided within the provincial and federal regulatory framework for pharmacy practice and comply with standards of practice; for example:

Ensuring that the confidentiality and integrity of all patient information is protected. Patient data

transmissions should be encrypted to prevent the possibility of access by the Internet service provider or any other unauthorized party.

Advising the patient to consult a pharmacist, physician or other health care provider if the patient's interests would be better served by a face-to-face consultation.

Ensuring that drug and health care information provided on a pharmacy website is of a high professional standard. If specific recommendations are made, the pharmacist should ensure that the patient or caregiver receives the appropriate information about use, precautions, adverse effects, etc. Record keeping is advisable.

0 Pharmacies should ensure that they have adequate professional liability insurance to cover on-line services.

P Pharmacies should consider if the information they present meets definitions for advertising and, as such, may need to meet regulations pertaining to advertising.

ADVISING INTERNET PHARMACY SITES

The following is presented to assist the public in protecting their health and privacy:

0 Make sure that you use reliable sources of health and medical information on the Internet. The Government of Canada has launched the Canada Health Network (CHN), www.canadian-health-network.ca, whose goal is to provide links to health information on the Internet that meets minimum criteria, as set by the Network. The CPhA brochure, *Looking for Health Answers Online? Talk to Your Pharmacist* provides further information.

k Information obtained on the Internet should not replace consultation with your pharmacist, physician or other health care provider. Talk to your pharmacist or physician before you decide to treat yourself, change your medication or use any medication for the first time.

0 You should expect the same high quality of care, whether the service is provided on-line or face-to-face in a pharmacy.

- 0 Be cautious about buying medications via the Internet. Be aware that websites can be created to look like legitimate pharmacies when in fact both the sellers and the products are illegitimate. Purchasing a medication from an illegal website puts you at risk-- you may receive a contaminated or counterfeit product, the wrong product, an incorrect dose, or no product at all.
- 0 Assure yourself that the Internet pharmacy you choose is a bona fide, fully licensed facility exercising safe pharmacy practices and is in compliance with federal and provincial laws and regulations.
- 0 Do not hesitate to contact your provincial pharmacy licensing body to confirm that an on-line pharmacy is a licensed pharmacy in good standing in Canada. Check that U.S. sites have the VIPPS seal.
- 0 In Canada, prescriptions cannot be filled via the Internet. Do not get prescriptions filled by foreign sites, even if you are asked to fill out a questionnaire for review by a physician. An on-line questionnaire does not give enough information to a health care professional to make a safe decision. Taking an unsafe or inappropriate medication puts you at risk for dangerous drug interactions and other serious health problems.
- P Information that sounds too good to be true requires careful assessment. Beware of sites that advertise a "new cure-for a serious disorder or a quick cure-all for a wide range of ailments. Steer clear of sites that include undocumented case histories claiming amazing--results.
- 0 That CPhA support the National Association of Pharmacy Regulatory Authorities (NAPRA) in national initiatives to ensure consumer protection from unsafe and counterfeit drugs and from the illicit or inappropriate practice of pharmacy.
- 0 That CPhA support the regulatory policy of the Health Canada on the implementation of the regulatory provisions currently applied to traditional "brick and mortar-and mail order pharmacies.
- 0 That CPhA support NAPRA's work in developing an identifying "seal of approval" and consumer awareness program for legitimate Internet pharmacies (corresponding to the VIPPS program in the US) to ensure that consumers are protected.
- 1 That CPhA work with NAPRA, medical organizations and regulatory authorities, Health Canada and policing agencies, as appropriate, to ensure consumer protection from foreign-based sites and the illicit or inappropriate practice of pharmacy or medicine.
- k That further work be done to develop standards and security for the electronic transmission of patient data, with respect to on-line transmission of prescriptions from prescribers to pharmacists. CPhA has been involved in electronic data transmission since the early 1990's with the development of on-line prescription claims processing, including the revised *Pharmacy Electronic Communication Standard (PECS, Version 2.0)*. CPhA is also a member of the Advisory Panel on Electronic Transmission of Information (APET) whose primary focus is to advise the Therapeutic Products Programme, Health Canada, on information technology/information management.

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