

Submission of the
National Association of Pharmacy Regulatory Authorities (NAPRA)
to the
Health and Human Services Task Force on Drug Importation

Established in 1995, the National Association of Pharmacy Regulatory Authorities (NAPRA) is Canada's national voluntary umbrella association of provincial and territorial pharmacy regulatory bodies. Our members regulate the practice of pharmacy and operation of pharmacies in eight of our ten provinces, two territories, and in the Canadian Armed Forces. We represent and promote the common interests of our members and support their activities in public protection. Our mandate, activities and membership structure are similar to that of the National Association of Boards of Pharmacy.

The issue of exporting prescriptions to American citizens by Canadian pharmacies has been one of increasing concern for our Association over the past two years. In February 2003, we organized a forum attended by representatives of organized pharmacy and medicine (both public protection and advocacy sides), Canadian prescription exporters, the pharmaceutical industry, academia, and governments from the USA and Canada, to identify areas of concern related to this trade. While many stakeholders on both sides of our border have continued to dialogue and look for resolution to these issues since the February 2003 forum, most remain unresolved today. Our concerns centre on:

- ?? the legal, ethical and resource challenges experienced by our members in carrying out their public protection duties in an international environment,
- ?? the effect that this cross-border trade will have on the supply and cost of pharmaceuticals for Canadians, and
- ?? the impact that supplying pharmacy services to the vast American market will have on Canada's supply of pharmacists and indeed, on our entire pharmaceutical supply chain.

Our federal, provincial and territorial regulatory and drug approval systems were not designed to regulate the export of prescription drugs or to protect the citizens of other countries. Until such critically important matters as outlined above can be addressed, we believe that relying on the Canadian healthcare system to ensure that a portion of American citizens have access to affordable prescription drugs is at best, a temporary "quick fix" solution.

Accordingly, our members have requested that the Canadian government ban the exporting of drugs from our pharmacies to citizens of the US and other countries until such time as the long-term effects of this trade on the supply and price of pharmaceuticals to Canadians can be determined and pending this outcome, until governments can implement systems to ensure the effective regulation of this trade to protect public safety.

In closing, we appreciate this opportunity to share our concerns with the Task Force and fully appreciate the complexity and compelling nature of this issue. We remain optimistic however, that a solution can be reached that will not be ultimately detrimental to either Canada or the USA and we are most willing to collaborate to achieve this goal.

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