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## Comment from Georgia Pharmacy Association

This is a Comment on the **Food and Drug Administration (FDA)**  
Proposed Rule: **Importation of Prescription Drugs**

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### Submitter Information

**Country:**

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GA

**Submitter's Representative:**

Bob Coleman

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### Comment

I write today on behalf of the 2800 members of the Georgia Pharmacy Association to express our opposition to the proposed draft regulations to import Canadian medication into the United States. It's time for our politicians to quit making this soundbite out to be a workable solution to combat high drug prices. I could write volumes on why this would be a terrible decision, but I imagine you are receiving lengthy letters from my colleagues, so rather than repeat those efforts here, I will share the one clear fact that makes this idea totally ludicrous.

The entire population of the Canada is 37.5 million people. The populations of Georgia, Florida, and Alabama add up to 36 million people. If you could take ALL the drugs from every Canadian, it would barely cover the needs of only these three states, much less the rest of the United States.

This proposal is unworkable because of the U.S.-Canadian population difference, existing Canadian shortages, and non-cooperation of Canadian stakeholders.

The unlikelihood a program will save money for American patients and the enormous costs means patient safety will be and is currently being compromised to make importation work.

Relaxing standards for supply chain safety is not an acceptable tradeoff for lower prices.

The history of and prevalence of counterfeits previously trafficked by Canadian operators even those with wholesale licenses, the difficulty of regulating foreign entities by state boards of pharmacy, and the lack of a Canadian Track and Trace system.

We agree with you that addressing health care costs is a critical and priority issue for every American right now. Beyond just the numbers cited above, this program seems very unlikely to bring down drug prices for Americans and very likely to create safety issues.

Pharmacists live and work on the front lines of health care affordability. We urge you to pursue solutions that will work without sacrificing safety.