



January 6, 2020

The Honourable Patty Hajdu
Health Canada
Brooke Claxton Building
Tunney's Pasture
Postal Locator: 0906C
Ottawa, Ontario K1A0K9

Dear Minister Hajdu,

We are writing on behalf of HealthPRO, Canada's group contracting provider for healthcare, to express our concerns regarding U.S. drug importation proposals and the unintended consequences for Canadians.

As you may know, HealthPRO is wholly owned by our members, the public healthcare system, overseeing billions of dollars in joint procurement activity on behalf of over 1,300 healthcare facilities across the country. Health Authorities and independent hospitals leverage our national buying power to ensure the public healthcare system gets the best possible value out of their expenditures including medical devices, supplies and medications.

Given our role, the Trump Administration's intent to release a plan that will allow states to import prescription drugs from Canada is of grave concern for the acute healthcare sector for the following reasons:

1. Risk of increased drug shortages

Drug shortages are already a significant problem for Canadians with a current 1,650 drugs in short supplyⁱ. Our contracts exist to provide a consistent supply for hospitals notably for critical drugs and essential therapies where there are few alternatives. As highlighted by the former Minister of Health Ginette Petitpas Taylor, Canada is not equipped to support the needs of a country 10 times its size. In fact, according to a study published by the Canadian Pharmacists Journalⁱⁱ, Canada's drug supply would be exhausted in 224 days – less than eight months – if just 10% of U.S. prescriptions were filled with Canadian drugs.

2. Increased strain on hospitals

Although many of the drugs being contemplated for importation are not hospital-specific, our acute care members are concerned that the sudden unavailability of community-based drugs would trigger a rise in hospital visits to seek care and extended stays due to unavailable therapies and potential adverse events from counterfeit therapies.

3. Increase in counterfeit drugs putting Canadians at risk

Counterfeit drugs are already a multi-billion-dollar problem in Canadaⁱⁱⁱ. They may contain no active ingredient, harmful ingredients, the wrong drug, the wrong concentration, the wrong dose or drugs past their expiry dates, resulting in reduced treatment effectiveness, unexpected side-effects and potentially death. As identified by The Alliance for Safe Online Pharmacies Canada^{iv}, more permissive import legislation in the U.S. could push Canadian patients to access drugs through unlicensed websites, putting them at risk for counterfeit or substandard medicines.



On behalf of our healthcare facilities, we urge our government to take all measures necessary to protect Canada's fragile drug supply and the safety of vulnerable patients.

We would be pleased to assist in this effort in any way you deem fit and thank you for your support and leadership in this matter.

Sincerely,

Christine Donaldson
Vice President, Pharmacy
HealthPRO Procurement Services Inc.

Spencer Tuttle
Director, Lower Mainland Pharmacy Services
Chair of HealthPRO's Pharmacy Advisory Council

ⁱ <https://www.drugshortagescanada.ca/>

ⁱⁱ <https://journals.sagepub.com/doi/abs/10.3821/1913-701x-143.5.226>

ⁱⁱⁱ <https://business.financialpost.com/opinion/they-cost-us-billions-and-they-can-kill-counterfeit-drugs-are-invading-canada>

^{iv} <https://www.cbc.ca/news/canada/toronto/american-demand-canada-drug-supply-1.5226871>