

August 19, 2017

Consultation on Opioid Warning Materials and Risk Management Plans

Policy, Planning and International Affairs Directorate
Health Products and Food Branch
Health Canada
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CAPA is a grassroots, patient driven, independent, national organization with three hundred active members across Canada and supporters who are both Canadian and international. We believe the first expert on arthritis is the individual who has the disease. We provide a strong voice and concerted effort to promote the social, economic, and environmental well-being of people living with arthritis. We assist members to become advocates for themselves and for all people with arthritis, regularly communicating our activities through our website, Facebook Page and a quarterly newsletter.

Our organization was founded in 2002 giving us over a decade of productive collaboration with arthritis researchers, government, non-profit sector and those living with arthritis. We have a proven track record on engaging with our members for their valuable input and for translating knowledge gained through research.

At CAPA we know that a diagnosis of arthritis is a difficult one to live with affecting all aspects of a person's life, including family, friends, work, and play. As people living with arthritis, CAPA members know that being able to manage arthritis symptoms, a major one being daily, chronic pain is important for our health.

We have the following comments on the opioid warning material and risk management plans consultation.

- 1. Warning stickers have been placed on opioid prescription bottles for some time now. Patients who receive these prescriptions are accustomed to seeing them and ultimately ignore the stickers as they are on many different medications that we are prescribed.**
- 2. Patients who are prescribed opioids and take them appropriately are currently being stigmatized. It can even be a challenge to go on a vacation. You cannot**

refill your prescription even one day early. The only option is to make an appointment with your physician before going away. This represents unnecessary costs to the health care system and additional burden on patients who may already feel overwhelmed by the number of medical appointments they must go to. Also, they will face additional scrutiny at the pharmacy with the revised script.

3. **Dependency on medications occurs with many different drugs, not just opioids. Addiction as a health issue is a completely separate issue from legitimate and appropriate use of opioids for pain. A single strategy to address these two health concerns will be ineffective.**
4. **There was insufficient representation from the pain community at the November 19, 2016 summit. This, despite requests from our organization and possibly others to participate.**
5. **The language that Health Canada uses with these consultations can be extremely intimidating for the average Canadian patient. In the past there have been on-line webinars to help explain the proposed changes, for example the recent self-care consultation. On an issue as important to the health of Canadians as opioid use Health Canada should have hosted a similar event.**

CAPA has written Minister Philpott expressing our concerns regarding the missing voice and perspective of the pain community in this critical dialogue. We cannot attempt to solve one serious health crisis by creating another. Solutions put forward must be thoughtful and include everyone who impacted. Thank you for the opportunity to provide our thoughts through this consultation.

Sincerely,



Linda Wilhelm
President