

**May 1, 2020**

Director of Policy and Legislation  
College of Pharmacists of British Columbia  
200 – 1765 W. 8<sup>th</sup> Avenue  
Vancouver, BC V6J 5C6

**BY EMAIL:** [legislation@bcpharmacists.org](mailto:legislation@bcpharmacists.org)

And To:

Director of Regulatory Initiatives,  
Professional Regulation and Oversight,  
Clinical Integration, Regulation and Education  
Ministry of Health  
1515 Blanshard Street  
PO Box 9649 STN PROV GOVT  
Victoria, BC V8W 9P4

**BY Email:** [PROREGADMIN@gov.bc.ca](mailto:PROREGADMIN@gov.bc.ca)

Dear Madam/Sir:

**Re: Bylaw amendment - Temporary changes for dispensing drugs for the purposes of Medical Assistance in Dying (MAiD)**

The BCPhA wishes to thank you for the opportunity to comment on the proposed bylaw. We note the urgency of this matter and agree with the shortened timelines.

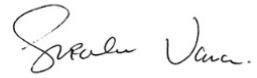
Many of the drugs that are used in MAiD are also used to treat patients with COVID-19 who require critical care. The increased use of these drugs for critical care is leading to shortages of these drugs for use in MAiD. As a result, community pharmacy is facing challenges securing sufficient supply and maintaining adequate inventory levels.

The BCPhA supports the College Board's decision to approve temporary amendments to the *Health Professions Act* Bylaws Schedule F Part 5 – *Dispensing Drugs for the Purposes of MAiD Standards, Limits and Conditions* to temporarily allow injectable drugs that have been dispensed for MAiD purposes to be returned to inventory rather than being disposed of, provided certain conditions are met.

To ensure that pharmacists can lawfully return such drugs to stock or reuse any drug previously dispensed for the purposes of MAiD, section 22 of the *Pharmacy Operations and Drug Scheduling Act (PODSA)* Bylaw needed to be amended to include a reference to the MAiD Standards, Limits and Conditions.

The BCPHA believes this temporary change is in the interests of patients, and supports this amendment.

Sincerely,

A handwritten signature in black ink, appearing to read "Geraldine Vance". The signature is written in a cursive, flowing style.

Geraldine Vance  
CEO  
BC Pharmacy Association

cc: Bob Nakagawa