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August 25, 2014

The Honourable Rona Ambrose
Minister of Health
Health Canada
70 Colombine Driveway, Tunney's Pasture
Ottawa, Ontario K1A 0K9
Canada

Dear Minister Ambrose,

There has been much attention paid by healthcare professionals, healthcare organizations, and policy makers around the serious public health problem of misuse and abuse of prescription opioid medications. There is a strong desire by all involved to eliminate this problem to prevent further harm and loss of life. The American Society for Pain Management Nursing®'s (ASPMN®) mission is to advance and promote optimal nursing care for people affected by pain. All nurses are pain management nurses, and we are healthcare's front lines. As a group with a vital stake in improving pain care, we applaud Health Canada's consultation with interested parties, regarding the regulation of tamper-resistant drugs that are at high risk of abuse and misuse. We understand and agree that ensuring safety surrounding prescription medications, particularly those prone to misuse and abuse, is a priority.

While public awareness and provider education about prescription drug abuse remains an important component, products formulated with properties designed to deter intentional abuse, while simultaneously not interfering with the delivery of effective pain relief, present a promising method of dealing with prescription drug abuse.

We believe that medications with tamper-resistant properties can have a positive impact on reducing the rate of misuse and abuse. The ability of these products to meaningfully reduce the overall rate of this depends on their availability and how they are being prescribed and dispensed to Canadian patients. As nurses dedicated to pain management, we believe that tamper resistant medications are a strong tool and of benefit in the ability to reduce abuse and misuse of these medications.

Minister, we support your efforts to ensure that the potential public health benefits of abuse-deterrent and tamper-resistant products are achieved quickly and effectively. We urge Health Canada to expedite the issuance of guidance addressing these priorities and as one of the approaches to reducing the harms caused by prescription drug abuse.

Sincerely
American Society for Pain Management Nursing®