



Wednesday, June 27, 2018

Hon. Ginette Petitpas Taylor, P.C., M.P
Minister of Health
Health Canada
Brooke Claxton Building, Tunney's Pasture
Ottawa ON K1A 0K9

Dear Minister,

Thank you for your letter dated June 19th and we want to assure you that Purdue Pharma (Canada) is also deeply concerned about the opioids crisis. In response to your call for action to support Canada's collective response to the opioids crisis, effective June 20, 2018, **Purdue Pharma (Canada) suspended all promotional and advertising activities relating to our prescription opioids**, pending the outcome of your consultation and the implementation of new regulations.

While we have taken this action, we remain steadfast in our belief that Canadian prescribers require the most recent information, including on the most current guidelines, to ensure their patients are treated appropriately. Going forward, requests for information about our opioid products from healthcare professionals will be addressed reactively through direct communication with the experienced healthcare professionals in our Medical Affairs department.

Pain Management and Putting Patients First

Purdue Pharma (Canada) is a leader in pain management in Canada. Our company was physician-founded, with a 60-year history of supporting physicians and pain patients with Health Canada approved innovative products, independently accredited education for healthcare professionals, and ethical interactions by our employees across a range of health system stakeholders.

The opioids crisis is a complex and multifaceted public health issue that involves both prescription opioids and, increasingly, illegally produced and consumed opioids, as indicated in Health Canada's latest quarterly monitoring report. Nonetheless, all stakeholders, including the pharmaceutical industry, have a role to play in providing practical and sustainable solutions.

According to the [Canadian Pain Society](#), 1 in 5 Canadians suffer from chronic pain and pain is the most common reason for seeking healthcare in Canada. Purdue Pharma (Canada) supports a research-driven approach to managing pain that may or may not include available prescription products, in concert with other effective pharmacological and non-pharmacological treatments.

As government policy with respect to the marketing of prescription opioid medications evolves, neither pain patients nor their physicians should be subject to stigmatization, either for seeking treatment for their conditions, or for treating patients according to their best professional and clinical judgment.

Pain medications, when appropriately prescribed in accordance with established guidelines, offer effective pain relief to patients in a number of areas, including surgery, oncology, chronic non-cancer pain and palliative care.

Continually Adhering to Government Regulatory Requirements

Purdue Pharma (Canada) has always marketed its products in line with the Health Canada approved product monograph and in compliance with all relevant rules, regulations and codes, including the [Food and Drugs Act](#) and the [Pharmaceutical Advertising Advisory Board \(PAAB\) Code](#). Moreover, our company has always adhered to all Health Canada and international regulations, including pharmacovigilance reporting obligations. Additionally, as a member of Innovative Medicines Canada, we also adhere to its [Code of Ethical Practices](#).

We endorse relevant clinical practice guidelines and, in fact, Purdue representatives have engaged with healthcare professionals (HCPs) to distribute and inform them of the [2017 Canadian Guideline for Opioids for Chronic Non-Cancer Pain](#), which we fully support. In November 2017, we had a positive meeting with the Health Canada opioids response leadership team in Ottawa to advise them of these efforts and provided the exact materials and tools we use with prescribers that are evidence-based and follow current clinical practice guidelines, such as the Patient Agreement and Opioid Risk Tool.

Evidence-Based Education is Essential

We support evidence-based, non-branded, and independently accredited Continuing Health Education (CHE) programs to improve clinical care and patient outcomes. These programs transfer knowledge of the latest advances in science and clinical practice between qualified HCPs and are subject to rigorous review by respected organizations, including the [Royal College of Physicians and Surgeons of Canada](#), the [College of Family Physicians of Canada](#) and the [Fédération des médecins omnipraticiens du Québec](#). We believe in the value of accredited CHE Programs that are currently offered to healthcare professionals through Purdue Pharma (Canada) which include:

- Optimizing Pain Relief and Function with Non-Pharmacological Therapies;
- Managing Chronic Pain: When and How to Discontinue Opioids;
- Urine Drug Testing (UDT) in Pain Management; and
- Approaches to Responsible Opioid Use: Maximizing Your Role in Improving Outcomes and Reducing Risk.

We have suspended these programs which we regard as education not promotion. However, we are concerned as to how HCPs will have access to similar information about chronic pain management, pharmacological and non-pharmacological pain therapies, and current opioid use guidelines that could be of benefit to clinicians and patients.



Peer-reviewed, scientific exchange between industry, researchers and clinicians is essential to drive medical progress and improve patient outcomes. Accordingly, we ask that you give thought to further approaches to facilitate ongoing educational support to healthcare professionals as new regulations are implemented.

Our Belief in Tamper-Resistant Opioid Medications

While doing our part to further education in pain management, Purdue Pharma (Canada) and independent associated companies have worked for more than 15 years on the development of abuse-deterrent formulation (ADF) / tamper-resistant (TR) opioid medicines to make the misuse, abuse and diversion of prescription opioids more difficult. Health Canada has recognized the TR features of both [OxyNEO[®]](#) and [Targin[®]](#), the only two opioid products recognized as such in Canada.

Purdue's commitment to ADF and TR technologies is driven by the abundance of published evidence supporting the positive impact these technologies have on public health. Presently, Canadian prescribers, pharmacists and patients have limited access to these technologies. We continue to believe that governments – both federal and provincial – as well as private payers should consider accelerating their efforts to enact appropriate regulatory (where applicable) and reimbursement policies to increase the availability of ADF and TR opioid medications.

These technologies are one component of the broader solution to address the misuse, abuse and diversion of prescription opioid medicines and a host of national organizations including healthcare professionals, law enforcement and patient groups endorse this position. In addition, we continue to respond to law enforcement agencies to help them combat the illegal elements of this complex crisis.

Partnering for Results

Purdue Pharma (Canada) is making ongoing contributions to public health including:

- Support of CIHR's [Strategy for Patient Oriented Research](#) (SPOR) through a significant donation to the Michael G. DeGroot Institute for Pain Research *Chronic Pain Network* which was announced by your predecessor, Hon. Dr. Jane Philpott, on March 31, 2016;
- Funding programs for safe and effective collection and disposal of prescription medications through the [Health Products Stewardship Association](#) across Canada;
- Supporting [Drug Free Kids Canada](#) since its inception; and
- Educating law enforcement officers, first responders and healthcare providers with a tool to assist in identification of prescription opioid analgesics/stimulants marketed in Canada through the development of a [product identification pamphlet](#), in concert with the Canadian Pharmacists Association, which is used daily by the aforementioned groups nation-wide.



To conclude, we firmly believe that our ethical engagement with HCPs and stakeholders, adherence to regulatory requirements, support for independently accredited CHE, investing in tamper-resistant opioids and partnering with national and regional organizations across industry, the academic and not-for-profit sectors were positive actions and part of the solution to the opioids crisis.

We look forward to contributing to your consultation process and should you have further questions, please do not hesitate to contact me directly at [deleted telephone number] or by email at [deleted email]. It would be my pleasure to meet with you as your schedule permits.

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Pidduck". The signature is fluid and cursive, with a long horizontal stroke at the end.

David A. Pidduck
President and CEO