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Dear Executive Committee Members,

We are writing you regarding the review of the report proposing changes to retail business hours on the nine official public holidays in Ontario. As an Academic Health Science Centre that treats people with mental illness and addiction issues, many of whom regularly access pharmacy services, the Centre for Addiction and Mental Health (CAMH) has an interest in this issue.

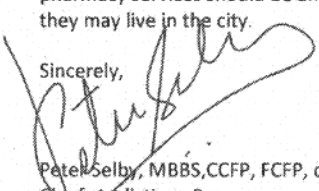
Last year, Toronto residents required prescription services over 53,000 times on public holidays as well as a wide range of other health services. These services included assisting clients with chronic disease management, providing over the counter counselling and medication management, as well as methadone treatment. Pharmacies provide front-line health services and triage support, which reduce overcrowding in hospitals and after-hours clinics, and ensure that clients receive continuity of care every day of the year. The provincial government also recently recognized the essential role pharmacists play in protecting public health in Ontario by announcing on October 9 2012 that pharmacists will now have the ability to administer flu shots, renew most prescriptions for up to six months and prescribe drugs to help quit smoking.

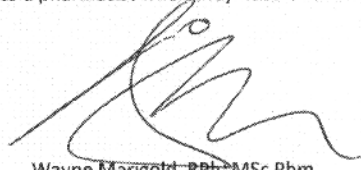
This restriction on business hours also increases the potential for health risks to people receiving methadone maintenance treatment. Uninterrupted daily access to pharmacy services is particularly important for these clients. In the absence of the daily observed dosing recommended by treatment guidelines, clients are at higher risk of overdose. Diversion and illicit sale are also concerns when multiple doses are distributed.

Other potential health risks occur when clients must use other pharmacies because their normal location is closed. Due to privacy laws, medical records and active prescriptions cannot be shared between pharmacies. This increases the risk of health problems for clients due to a lack of available information. This is especially pronounced for more vulnerable members of society, such as the elderly and those that require access to certain treatments such as methadone, etc.

By limiting which pharmacies are allowed to open based on square footage, or where they are located in the city, clients are prevented from accessing essential health care services. We respectfully suggest that a bylaw impacting access to pharmacy services should be amended to ensure clients have access to a pharmacist when they need one – wherever they may live in the city.

Sincerely,

  
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