



Health
Canada

Santé
Canada

Healthy Environments
and Consumer Safety
Branch

Direction générale,
Santé environnementale et
sécurité des consommateurs

Your file Votre référence

HC6-69-1-1

Our file Notre référence

Jim C. Gourdon, DVM
President
Canadian Association of Laboratory Animal Medicine
3655 Prom Sir William Osler
Rm 1416
Montréal QB H3G 1Y6

Dear Dr. Gourdon:

The Office of Controlled Substances (OCS) has recently been contacted with regards to the authority of a licensed veterinarian administering controlled substances in a research setting. In response to these communications, on July 22, 2016 the OCS contacted the provincial and territorial veterinarian licensing authorities to solicit their input and feedback regarding the OCS' policy concerning controlled substances administered by veterinarians to research animals. This consultation concluded on August 26, 2016.

The provincial and territorial organizations were informed that the OCS was evaluating if research animals could be considered patients under the care and treatment of a veterinarian (within the meaning of the *Controlled Drugs and Substances Act* (CDSA) and its regulations), this meaning, activities conducted by veterinarians with CDSA-scheduled substances, including their administration research animals in certain situations, could be permitted under the veterinarian's professional licence (subject to the limitations set out in the CDSA and its regulations). The organizations were invited to provide opinions and feedback regarding the proposed policy and a draft amended application form. Please find attached the letter and the draft amended application form the OCS sent to the provincial and territorial veterinarian licensing authorities on July 22, 2016.

Overall, four provincial organizations responded by providing useful input and feedback regarding the proposed policy change outlined in the letter and the draft amended application form.

In addition to the responses received from provincial organizations, observations, comments and recommendations were put forward by the Canadian Council of Veterinary Registrars.

Based on the results of the consultation, the OCS is implementing a change. As of **January 1, 2017**, veterinarians and researchers will no longer require an exemption issued under subsection 56(1) of the CDSA for CDSA-scheduled substances being administered to research animals by a licensed veterinarian, provided that both of the following conditions are met:

1. The research animal is under the professional treatment of the veterinarian; and
2. The CDSA-scheduled substance is required for the condition for which the animal is receiving treatment.

When the above conditions are not met, principal investigators who are administering CDSA-scheduled substances to research animals will still require a subsection 56(1) exemption.

With regards to the draft amended application form, no major concerns were expressed and consequently, the new application form will be circulated for use by principal investigators when the new policy is implemented.

As previously mentioned, the OCS recognizes:

- Veterinarians are the health professional who are best situated to select the appropriate drug regime involving controlled substances to be used by researchers;
- The animal use protocol should be informed by the animal care committee and include the advice of a veterinarian;
- CDSA-scheduled substances that are the subject of the research always require a subsection 56(1) exemption regardless of the principal investigator being a veterinarian; and
- Principal investigators should obtain controlled substances from an authorised supplier such as a Canadian licensed dealer.

If you have any questions with regards to exemptions or the policy change, please do not hesitate to contact us by email at exemption@hc-sc.gc.ca.

Regards,



Julie Thompson
Director

Office of Controlled Substances