



Canadian Cancer Society
Société canadienne du cancer

[date]

The Honourable Patricia Hajdu
Minister of Health
Health Canada
Brooke Claxton Building, Tunney's Pasture
Ottawa, Ontario K1A 0K9

Dear Minister:

As Canada's largest healthy charity, the Canadian Cancer Society requests that you immediately address the shortage of essential, critical medications in our national drug supply. These shortages are exacerbated by the COVID-19 pandemic and disproportionately impact people living with cancer.

Over the last few months, Canada faced major supply issues, resulting in several additions to Health Canada's Tier 3 drug shortage list. Although the full effects of COVID-19 are not yet known, manufacturers added 461 new shortages since March 2020. Now, 10% of the drugs on the list are cancer medications. This figure increases significantly when we factor in medications that support cancer surgeries or mitigate side-effects.

Unfortunately, reoccurring drug shortages in Canada are not new and showcase larger systemic flaws that must be addressed. For instance, in August 2019 several hospitals faced cancer drug shortages for three intravenous drugs with potential impacts on people with cancers including bowel, colon, rectal, gastric, esophageal, pancreatic, small cell, testicular, ovarian, hemotologic cancers such as leukemias and lymphomas, lung, and breast cancers. These shortages left healthcare professionals and hospitals scrambling to find alternatives. The outsourcing of drug production and limited transparency in drug procurement are some of the main causes of reoccurring drug shortages.

Research from the Centre for Health Evaluation and Outcome Sciences (CHÉOS) found that of the 9,000 different drugs marketed in Canada, one quarter were reported in shortage during their study period, with the average length of shortages being five months.¹ We know that shortages are deeply worrying to people with cancer and their families – it is simply not acceptable to go without the medication you need. People facing a cancer diagnosis don't have time to wait for drug shortages to clear or new treatments to emerge. The COVID-19 pandemic puts people with cancer among the most at risk, compounding the stress and anxiety that comes with a cancer diagnosis and treatment. Now more than ever, people living with cancer and their caregivers are counting on their government to end any disruptions to their treatment stemming from drug shortages.

The Canadian Cancer Society supports the long-term recommendations presented by the Critical Drugs Coalition to address drug shortages:

1. Stockpiling of a Critical Medications List that the government commits to ensuring are always in stock for long enough to meet the needs in an emergency

¹ Wei Zhang, Daphne P. Guh, Huiying Sun, Larry D. Lynd, Aidan Hollis, Paul Grootendorst, Aslam H. Anis. **Factors associated with drug shortages in Canada: a retrospective cohort study.** *CMAJ Open*, 2020; 8 (3): E535 DOI: [10.9778/cmajo.20200036](https://doi.org/10.9778/cmajo.20200036)



- a. Critical Medications List would allow the parties involved in addressing the drug shortages to have a clear picture of what drugs to monitor closely and provides a more comprehensive approach to the problem.
2. A publicly owned generic, critical drugs manufacturer, or at the bare minimum, public support for spare capacity by Canadian-based and controlled drug manufacturers to be used for critical drugs.
 - a. This manufacturer or manufacturers would specialize in manufacturing the critical drugs on the Critical Medications List and would be primarily involved in satisfying significant portions of our national demands.
3. Greater transparency and communications to and from governments and the health sector around the essential drug supply. This would include efforts to better track the supply of drugs in hospitals across the country and push notifications on shortages through the appropriate channels to frontline workers.

While your government has taken efforts to mitigate shortages during COVID-19, further action is required to develop long-term solutions to shortages that have impacted people with cancer for years. The presented solutions will require long-term coordination and planning, in addition to collaboration from the public and private sector to rapidly identify and respond to disruptions.

People with cancer deserve to have uninterrupted and reliable access to required medications in a timely manner, without financial hardship. We urge your government to address drug shortages in Canada and ensure people living with cancer have timely and unburdened access to their treatment.

Sincerely,

Andrea Seale
Chief Executive Officer
Canadian Cancer Society