COVID-19 – Update to Requirements for Post-Consumer Returns Containing Controlled Substances

This bulletin replaces the bulletin dated April 16, 2020. The period of validity of the bulletin has been extended up to March 31, 2021.

In response to the evolving health risk posed by the COVID-19 pandemic, the Office of Controlled Substances (OCS) is taking temporary measures to reduce the likelihood of spreading COVID-19 between consumers and pharmacists when returning products that may contain controlled substances to a pharmacy.

Firstly, in instances where pharmacists choose not to accept returns during this time, they should advise consumers on the proper storage of these products in their homes until such time that they can be safely returned to the pharmacy. Ideally, products that contain controlled substances should be locked and kept out of reach of children.

Should pharmacists choose to continue accepting post-consumer returns during this time, the OCS has recommendations to allow for reduced contact between consumers and pharmacists when returning products that may contain controlled substances to a pharmacy.

Pharmacists are still required to do their best to ensure post-consumer returns containing controlled substances remain secure. The following recommendations may be considered by pharmacists to help reduce the risk of spreading COVID-19:
In order to minimize contact with the general public and decrease the risk of transmission of COVID-19, pharmacists, technicians or interns could employ the same method used to accept paper prescriptions when accepting post-consumer returns. For example, a tray or a basket can be provided to the consumer while maintaining a proper physical distance. Pharmacy staff can then empty the tray into the post-consumer returns bin, while taking the necessary precautions, such as wearing gloves, handwashing, disinfecting the tray or basket, etc.

For programs such as the “Patch-for-Patch” program in Ontario, should ask patients to place the used patches in a transparent bag and use the same pass through process as noted above so that the pharmacist can reconcile the number of patches returned without having to touch them directly.

If a pharmacy chooses to accept empty methadone bottles, or in jurisdictions where this is a requirement, the same methods for receiving other post-consumer returns should be employed. If disposing of methadone carries in their own homes, patients should be advised to rinse the bottles well prior their disposal. Pharmacists may choose not to accept methadone carry bottles during the pandemic at all.

Patient returns must not be stored together with dispensary stock but rather in a post-consumer returns bin. Once the post-consumer returns bin is full, the pharmacist should follow the guidelines set out in the Guidance Document: Handling and destruction of post-consumer returns containing controlled substances (CS-GD-021) regarding the destruction of these products.

Pharmacists are also reminded to follow the direction of the Public Health Agency of Canada and their respective Provincial/Territorial Regulatory Authorities in regards to safety measures to help contain the spread of COVID-19, especially as information evolves on the viability of COVID-19 on containers, bins or cartons. The primary source of information on COVID-19 is canada.ca/coronavirus.
The measures above are effective as of April 16, 2020. As the duration of this pandemic is unknown at this time, these measures are set to expire on the earliest of the following dates:

- March 31, 2021;
- the date that they are replaced by new or additional measures; or
- the date upon which these measures are revoked.

If you have any questions, please contact Health Canada’s Office of Controlled Substances at hc.compliance-conformite.sc@canada.ca.