



NABP
National Association of
Boards of Pharmacy
www.nabp.pharmacy

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Dear Member of Congress:

In light of the mission of the National Association of Boards of Pharmacy® (NABP®) to assist its member boards of pharmacy in protecting the public health, I write to express concern regarding any proposed federal legislation that would allow the dispensing of non-United States (US) Food and Drug Administration (FDA)-approved medicines to patients in the US from online pharmacies, including Canadian online pharmacies. Such action would put patients in this country at risk of harm from counterfeit or adulterated medicines.

About The National Association of Boards of Pharmacy


NABP is the independent, international, and impartial Association that assists its member boards and jurisdictions in developing, implementing, and enforcing uniform standards for the purpose of protecting the public health. NABP is the only professional association that represents the state boards of pharmacy in all 50 United States, the District of Columbia, Guam, Puerto Rico, the Virgin Islands, the Bahamas, New Zealand, and 10 Canadian provinces.

Nearly 20 Years of Experience With Online Pharmacies

Since 1999, NABP has been monitoring and reviewing internet pharmacy websites. The Association's efforts began that year with the establishment of the Verified Internet Pharmacy Practice Sites® (VIPPS®) program, which accredits US pharmacies that dispense prescription drugs via the internet. In 2004, NABP launched the Veterinary-VIPPS® program to accredit US pharmacies that dispense prescription veterinary drugs via the internet. In 2010, NABP launched the e-Advertiser Approval^{CM} Program, which identified internet advertisers that offer limited pharmacy services or other prescription drug-related services online. Most recently, in 2014 NABP launched the .Pharmacy Top Level Domain Program to provide an easier and more secure way for patients to identify legitimate online pharmacies and pharmacy-related resources. For more about NABP's programs, visit www.safe.pharmacy.

The Facts About Canadian Online Pharmacies

There are roughly 35,000 active online pharmacies. NABP has done substantial research on online pharmacies with the goal of understanding this vast marketplace in order to help keep patients safe. Since 2008, NABP has reviewed more than 11,000 websites selling prescription medications and determined that **96% of online pharmacy websites are operating illegally**, out of compliance with state and federal laws and/or NABP patient safety and pharmacy practice standards. In many instances, these sites are foreign drug sellers masquerading as Canadian online pharmacies but actually dispense medications that are approved by neither FDA nor Health Canada.


Carmen A. Castoreo, MS, RPh, DPh
Executive Director/Secretary



In NABP's nearly 20 years of experience, US consumers buying medications from Canadian online pharmacies rarely, if ever, receive the Health Canada-approved products afforded to Canadian customers. Instead, these Canadian pharmacy websites sell US patients medicines manufactured in places where buyers would not even drink the water, e.g., India, Turkey, or Southeast Asia. NABP and many other patient safety advocates have found that the dangers of drugs dispensed outside of FDA's or Health Canada's drug approval process are significant. Outside these closed and tightly regulated drug supply chains, the safeguards put in place to ensure the identity, efficacy, and safety of prescription medications no longer apply.

Why Congress Should Not Encourage US Consumers to Buy From Canadian Online Pharmacies

It is NABP's understanding that Congress is contemplating legislation that would amend the US Food, Drug, and Cosmetic Act to allow US consumers to buy Health Canada-approved medicines from "legitimate" Canadian online pharmacies. Based on our experience, for the following reasons NABP believes this action would have grave consequences.

1. Sending consumers online hoping they will find a safe site is a big gamble, and you would be playing with peoples' lives. Even finding a legitimate online pharmacy that sells **US FDA-approved** medicines to US consumers is tricky, given there are 35,000 active online pharmacies operating today and 96% of them violate applicable laws.
2. Further, **NABP is unaware of any Canadian online pharmacies that consistently dispense Health Canada-approved medicines to US consumers.** To put it bluntly, sending consumers online to look for Health Canada-approved medicines is reckless, as US patients are likely to receive unapproved, substandard, and counterfeit drugs from unknown foreign sources, posing a serious risk to patient safety.
3. **Even if there were Canadian online pharmacies that consistently dispensed Health Canada-approved medicines to US patients (which is not the case today), how would a US consumer distinguish these sites from the thousands of other, dangerous sites selling counterfeit, adulterated, and unapproved products?** Even with the full force of US law enforcement going after illegal sites, thousands of illegal online pharmacy websites based offshore would continue to dupe US consumers into believing they are buying from a "real" Canadian online pharmacy. Proscriptive statutes, enhanced penalties, and additional enforcement resources do nothing to protect US consumers from illegal foreign actors who blatantly disregard US laws and hide in jurisdictions that will not extradite criminals.

We appreciate your consideration of our comments and offer any assistance that NABP can provide. Please do not hesitate to contact me at ccatizone@nabp.pharmacy or contact our office at 847/391-4400 with feedback or questions.

Sincerely,

NATIONAL ASSOCIATION OF BOARDS OF PHARMACY

A handwritten signature in black ink, appearing to read 'Carmen A. Catizone'.

Carmen A. Catizone, MS, RPh, DPh
Executive Director/Secretary