Destruction of Controlled Substances

DEFINITIONS

“Controlled substances” includes narcotics, controlled drugs, benzodiazepines and targeted substances.

“Post-consumer returns (PCRs)” are unused or expired controlled substances that have been returned by an individual to a community pharmacy for the purpose of destruction.

“Unserviceable stock” are controlled substances that are unusable, expired and/or that cannot be dispensed.

“Licensed Dealer” a business licensed by Health Canada with the authority to destroy controlled substances.

1. PURPOSE

Pharmacists are responsible for the secure storage, proper handling, destruction and record keeping of controlled substances. Pharmacists must take necessary steps to protect PCRs and unserviceable stock against loss or theft. Any loss or theft of a controlled substance must be reported to Health Canada within 10 days of discovery.

Health Canada released guidance documents supporting the Controlled Drugs and Substances Act that provide the necessary information needed to ensure pharmacists safely and securely handle and destroy post-consumer returns and unserviceable stock while properly documenting the process.

This document is not intended to replicate the Health Canada Guidelines but rather highlight specific areas. The following documents should be reviewed in full by all practicing members to ensure federal requirements are being followed:
• Health Canada – Guidance Document for Pharmacists, Practitioners and Persons in Charge of Hospitals: Handling and Destruction of Unserviceable Stock Containing Narcotics, Controlled Drugs or Targeted Substances
• Health Canada – Guidance Document: Handling and destruction of post-consumer returns containing controlled substances

2. HEALTH CANADA GUIDANCE

Health Canada guidance documents specify requirements pertaining to post-consumer returns and unserviceable stock. They acknowledge that provinces will have requirements that also apply. The following is a summary of the Health Canada Guidance documents and additional SCPP policy.

2.1. Collection of Post-Consumer Returns (PCRs)

2.1.1. Pharmacies must have a policy for accepting PCRs and all pharmacy staff must be familiar with the policy. The policy should include but is not limited to:

2.1.1.1. PCRs must be received by a pharmacist, pharmacy technician or pharmacy intern and immediately placed in the designated secure storage area.

2.1.1.2. There is no requirement to separate post-consumer returned controlled drugs from other post-consumer returned prescription or non-prescription medications. Record keeping requirements are outlined in Appendix A.

2.1.1.3. Consumers should be encouraged to remove personal information from pill bottles and packages of unused or expired medications prior to returning them to the pharmacy.

**SCPP Policy: Removal of Patient Information**

No person, including the patient, should attempt to remove personal information from contents inside a container or package they did not personally put together to avoid risk of exposure to needles or biohazards. The whole container, including its contents, should be destroyed together in a manner that maintains patient confidentiality.

The following is an example of a discipline case where a pharmacy failed to have appropriate policies and procedures to destroy personal health information contained on labels for methadone bottles dispensed to patients. Source: SCOPe, March 2020, Page 11, Discipline Matters. See also Opioid Agonist Therapy (OAT) Standards for proper disposal of used, empty methadone bottles returned for disposal.

2.1.1.4. Self-protection measures as outlined in SCPP’s Needlestick Injury Guidelines.
2.2. Storage Requirements

Common to both post-consumer returns and unserviceable stock:

2.2.1. All PCRs and unserviceable stock must be securely stored in the dispensary, and in a way that prevents diversion until they are destroyed locally or sent off-site for destruction;

SCPP Policy: Secure Storage and Diversion Prevention

Pharmacy managers must use professional judgement to implement pharmacy policies and procedures to ensure all unserviceable stock and post-consumer returns are stored securely with required documentation and record keeping. Pharmacy managers must evaluate the risk of staff members diverting these products and find ways to mitigate this risk.

Specific to post-consumer returns (PCRs):

2.2.2. PCRs are not to be co-mingled in the same storage container as unserviceable stock to ensure proper record-keeping;

2.2.3. Post-consumer returns that will be sent to a licensed dealer to destroy must be stored in a one-way entry container (i.e. drugs cannot be removed from the container once deposited) that has a unique identifier (e.g. “1A2B” for record keeping purposes). It is also recommended that the container is opaque, inconspicuous and tamper evident.

Availability of One-way Entry Containers

During Health Canada inspections, pharmacies are being advised that they must use one-way entry containers when they become available in Canada. Pharmacy managers are encouraged to check with their supply vendor or destruction service provider to inquire about the best option available to ensure secure storage and diversion prevention.

2.3. Destruction and Documentation

According to Health Canada, pharmacists are no longer required to obtain destruction authorization from Health Canada in order to proceed with local destruction nor send Health Canada a record of the destructions performed.
SCPP Policy: Destruction Frequency

Health Canada’s requirement is that destruction must occur on a regular basis as an accumulation may increase diversion risk. SCPP requires destruction at least every three months as well as any time when a significant accumulation has occurred. Destruction must be documented as outlined in Appendix A and B and retained as per SCPP Summary of Record Keeping Requirements.

There are two options for destruction of PCR and unserviceable stock:

2.3.1. **Option 1: Local (on site) Destruction**

2.3.1.1. **Requirements common to both PCRs and unserviceable stock:**

2.3.1.1.1. Destruction must be performed by a pharmacist.

2.3.1.1.2. The destruction must be witnessed by the pharmacist destroying the substance and one other pharmacist, pharmacy technician or pharmacy intern. Note: The witness requirements are the same for narcotics, controlled drugs and targeted substances. See Health Canada Guidance for PCRs and unserviceable stock for more information.

2.3.1.1.3. Destruction must render the controlled substances unusable.

2.3.1.1.4. The method used to destroy controlled substances must conform with all environmental legislation.

SCPP Guidance on Appropriate Method of Destruction

Pharmacists are encouraged to consult Workplace Hazardous Materials Information System (WHMIS) sheets for instructions on the appropriate method of destruction.

The use of chlorine bleach is not advised as it can cause exothermic reactions. Kitty litter and liquid soap is a safe alternative.

SCPP does not recommend the use of vinegar as there is no published information on using vinegar to denature medications. Additionally, it could react with some medications or their inactive ingredients.

Local destruction methods of patches include cutting in small pieces and then mix with dish soap to denature the gel.

For extended release dosage forms the extended release properties should be destroyed by crushing the tablets or opening capsules and crushing the beads. Then the powder may be disposed of as recommended for regular release medications.
2.3.1.1.5. The destruction process may vary depending on the chemical or physical properties of the drug, however a change of state is recommended (e.g. from solid to liquid).

2.3.1.1.6. Once subjected to local destruction, controlled substances may be placed in a designated drug waste container and disposed of in a manner that is environmentally responsible. Already denatured products do not need to be sent to licensed dealers for disposal.

2.3.1.2. Requirements specific to post-consumer returns (PCRs): The recordkeeping requirements specific to PCRs are outlined in Appendix A.

2.3.1.3. Requirements specific to unserviceable stock: The recordkeeping requirements specific to unserviceable stock are outlined in Appendix B.

2.3.2. Option 2: Destruction by a Health Canada Licensed Dealer

2.3.2.1. Requirements common to both PCRs and unserviceable stock:

2.3.2.1.1. Only a pharmacist, practitioner or person in charge of a hospital can arrange for a controlled substance to be sold or provided to a licensed dealer and this responsibility cannot be delegated to another employee.

2.3.2.1.2. Post-consumer returns and unserviceable stock can be shipped together, however, they are not to be co-mingled in the same container in order to ensure proper record-keeping.

2.3.2.2. Requirements specific to post-consumer returns (PCRs):

2.3.2.2.1. A licensed pharmacist must request the destruction of PCRs from a licensed dealer. The record requesting the destruction must be signed and dated by the pharmacist.

2.3.2.2.2. Once the pharmacist has received authorization from the licensed dealer, the shipment provided to a licensed dealer must record the:

- Number of containers;
- Date on which the containers were sold or provided;
- Unique identifier assigned to each container; and
- Name and address of the licensed dealer.

2.3.2.2.3. The above records must be retained for a period of no less than 2 years, in a manner that permits an audit to be made.

2.3.2.2.4. Records for post-consumer returns being sent to a licensed dealer must be kept separate from unserviceable stock being returned to a licensed dealer.
2.3.2.3. **Requirements specific to unserviceable stock:**

- **2.3.2.3.1.** Sale, provision, transportation or delivery of unserviceable stock may only occur after the pharmacist initiating the sale or provision has obtained a written signed order from the licensed dealer.

- **2.3.2.3.2.** The written order must specify the name, quantity and strength per unit of each controlled substance and a written statement that the sole purpose of the order is destruction.

- **2.3.2.3.3.** The pharmacist must keep record of the:
  - Name, quantity and strength per unit of each substance;
  - Name and address of the licensed dealer to whom it was sold or provided; and
  - Date on which it was sold or provided.

- **2.3.2.3.4.** Every order prepared in relation to the sale or provision of controlled substances to a licensed dealer must be recorded in a register similar to that required for other orders involving controlled substances.

- **2.3.2.3.5.** These records must be retained for a period of no less than 2 years, in a manner that permits an audit to be made.

2.3.3. **Destruction of post-consumer returned cannabis:**

- **2.3.3.1.** Rules related to handling and destruction of unserviceable stock and post-consumer returns for controlled substances that exist by virtue of the section 56 exemption under the Controlled Drugs and Substances Act (CDSA), have been transitioned to section 140 of the Cannabis Act and apply to legally-obtained cannabis. Therefore, pharmacists may accept post-consumer returns for cannabis, regardless of whether the product was obtained for recreational or medical use. Any theft of post-consumer return cannabis must be reported to Health Canada within 10 days and should be reported to law enforcement.

**SCPP Policy: Storage of Cannabis**

There is no restriction on the quantity of cannabis pharmacists may possess for the purpose of destruction but, given the risk of diversion, it must be stored securely, and must not be allowed to accumulate.

3. **ACKNOWLEDGEMENTS**

SCPP would like to acknowledge the Alberta College of Pharmacy in providing information for the ‘destruction of post-consumer returned cannabis’.
4. RELATED RESOURCES

SCPP Record Keeping Requirements for CDSA Drugs
Appendix A: Record Keeping Requirements for Local Destruction of **Post-Consumer Returns**

Pharmacy:  
Address:  
City:  
Pharmacy Manager:  

When signing below, the pharmacist in charge of destroying and the witness are indicating that the controlled substances were “altered or denatured to such an extent that its consumption was rendered impossible or improbable”.

<table>
<thead>
<tr>
<th>Date of Destruction</th>
<th>Unique Identifier of the Container(s)</th>
<th># of Containers destroyed</th>
<th>Pharmacist who performed the destruction (print name &amp; sign)</th>
<th>Witness* to the destruction (print name, sign, &amp; designation)</th>
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*Witness must be a pharmacist, pharmacy technician or pharmacy intern.

This record must be kept for a minimum of 2 years after the last date of destruction in a register similar to that required for other orders involving controlled substances. These records are not required to be submitted to SCPP or Health Canada but must be available for inspection on demand and may be requested at any time by SCPP.

Records for PCRs local destruction must be kept separate from those sent to a licensed dealer to destroy.

See [Health Canada Guidance on Post-Consumer Returns Section 4.1](#) for more details.
Appendix B: Record Keeping Requirements for Local Destruction of **Unserviceable Stock**

Pharmacy: | Address: | City:  
---|---|---
Pharmacy Manager:  

When signing below, the pharmacist in charge of destroying and the witness are indicating that the controlled substances were “altered or denatured to such an extent that its consumption was rendered impossible or improbable”.

<table>
<thead>
<tr>
<th>Destruction Date</th>
<th>Brand name or common name</th>
<th>Quantity</th>
<th>Strength per unit</th>
<th>Method of destruction</th>
<th>Pharmacist who performed destruction (print name &amp; sign)</th>
<th>Destruction witness* (print name, sign, &amp; designation)</th>
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*Witness must be a pharmacist, pharmacy technician or pharmacy intern.

This record must be kept for a minimum of 2 years after the last date of destruction in a register similar to that required for other orders involving controlled substances. These records are not required to be submitted to SCPP or Health Canada but must be available for inspection on demand and may be requested at any time by SCPP.

See [Health Canada Guidance on Unserviceable Stock Section 3.1](#) for more details.