DRUG INTERCHANGEABILITY UPDATE

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Drug product interchangeability decisions can be based on Health Canada's Declaration of Equivalence, as indicated by the identification of a Canadian Reference Product on a Notice of Compliance for a generic drug.

Pharmacists may also use their professional judgment in interchanging other products if the products meet the definition of an interchangeable drug. An interchangeable drug is defined in the *Health Professions Act:*

"Interchangeable drug" means a drug that:

- contains the same amount of the same active ingredients,
- possesses comparable pharmacokinetic properties,
- has the same clinically significant formulation characteristics,[1] and
- is to be administered in the same way as the drug prescribed.

Advantages of this approach to interchangeability:

1. When a generic product is approved for sale in Canada, it is immediately interchangeable with the brand name product it was compared to. There will be no delays in determining interchangeability.

2. The definition of an interchangeable drug in the *Health Professions Act* permits you to use professional judgment in specific circumstances.

   For example, if a physician prescribes 250 mg capsules of amoxicillin for a 3-year-old, you will still be able to use your judgment and dispense a suspension if, upon discussion with the caregiver, it is clear it is the more appropriate dosage form for the child. Those two products would meet the definition of an interchangeable drug.

   Similarly, if new information in the medical literature demonstrates that a generic product meets the definition of an interchangeable drug with a brand name product, those products can be interchanged. This is true even if the brand name product was not listed as the Canadian Reference Product on the generic product's Notice of Compliance.

3. The onus of informing you about the interchangeable status lies with the manufacturer of the generic product.

4. This approach eliminates the redundant processes undertaken in each province to re-review data that had already been submitted to and approved by Health Canada.

***Q**. How will I know if a generic drug is interchangeable with a certain brand name product?*

A. All Canadian generic products are interchangeable with their brand name comparator product. The brand name comparator product is also called the Canadian Reference Product.

A more detailed description of Health Canada's approach to generic drug approval is in the endnotes.[2]

***Q.** How can I be sure what the Canadian Reference Product is for a new generic drug?*

A. It will not be necessary for you to determine the Canadian Reference Product for existing generic products you are familiar with using. Since every generic product approved since 1995 was compared to a Canadian Reference Product, they are automatically interchangeable. Similarly, generic drugs marketed in the future will have been compared to a Canadian Reference Product, so they will interchangeable as well.

Nevertheless, if you are unsure about a generic product, there are a number of ways that you can confirm that the product can be automatically substituted. Figure 1 also describes the process.

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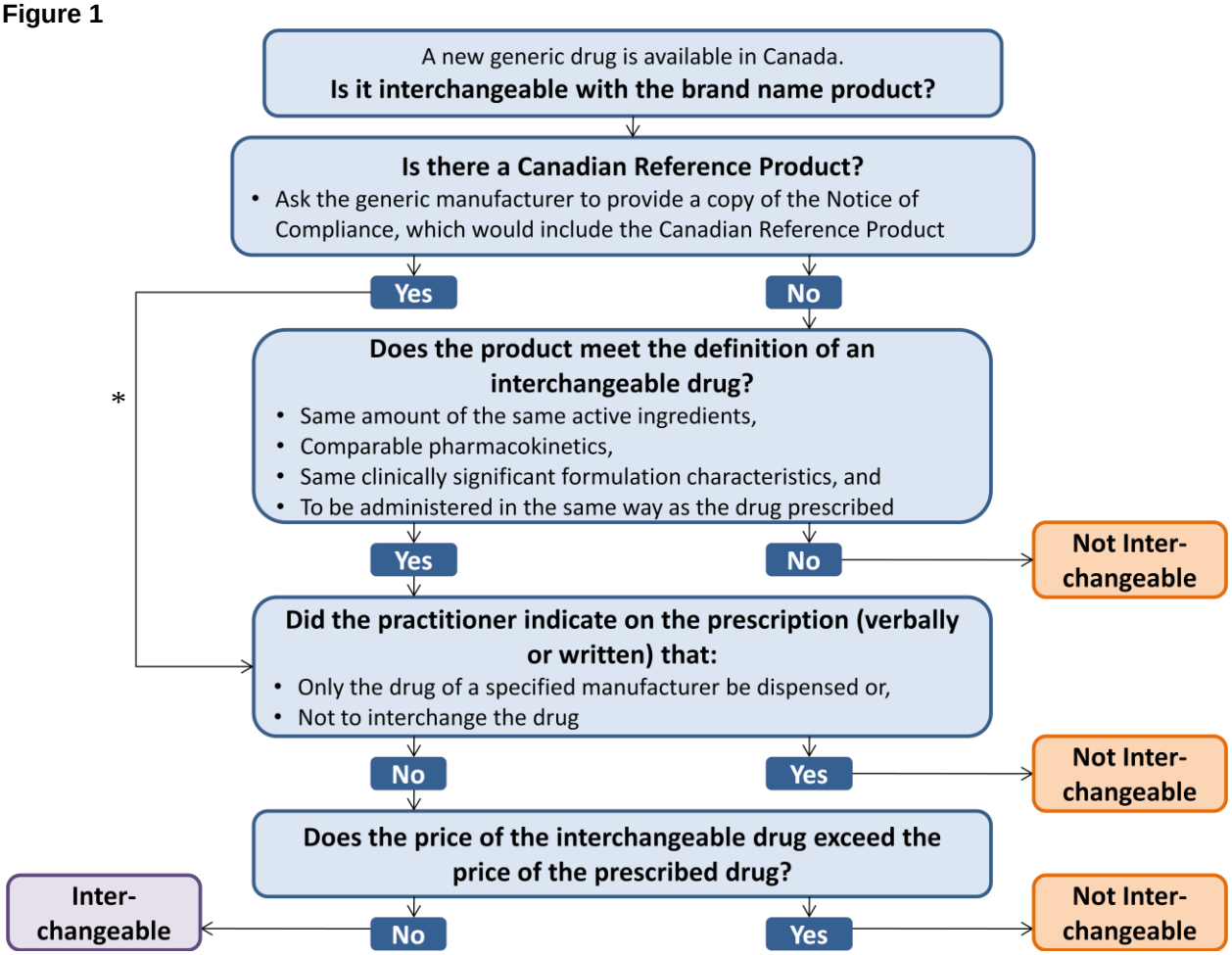
When a pharmaceutical manufacturer contacts you about a new generic product, ask them to provide you with a copy of the Notice of Compliance. You can be confident that the generic product can be interchanged with the Canadian Reference Product, as listed on the Notice of Compliance. If your head office makes purchasing decisions, you may ask your head office to provide you with this information.

Figure 1



Q. *What about drugs like digoxin or levothyroxine which used to be on the list of Noninterchangeable Drugs? If a generic of one of these products were marketed in Canada, could I automatically interchange it?*

A. Yes. If a generic digoxin or levothyroxine were marketed in Canada, it would receive a Notice of Compliance with a Canadian Reference Product and could be considered interchangeable with that Canadian Reference Product. Ensure the patient is being monitored by the physician when a brand change is initiated on drugs with a narrow therapeutic range.

Q. *Does my liability for interchanging drugs change as a result of this policy?*

A. The definition of an interchangeable drug is included in the *Health Professions Act* section 25.91. The *Act* addresses the question of liability as follows:

25.91 (1) If a practitioner indicates in a prescription that
(a) only the drug of a specified manufacturer, or

* Information regarding subsequent entry biologics is emerging. Until further evidence is available, the pharmacist should consult with Health Canada and the Manufacturer.

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(b) no interchangeable drug

is to be dispensed, a pharmacist must not dispense an interchangeable drug.

(2) If a practitioner has not made the indication described in subsection (1), a pharmacist may dispense an interchangeable drug provided its price to the purchaser does not exceed that of the prescribed drug.

(3) An indication from a practitioner under subsection (1) must be made by the practitioner to a pharmacist either

(a) orally, or

(b) in writing

at the time a prescription is issued.

(4) No action for damages or any other proceeding may be brought against a registrant solely because an interchangeable drug was dispensed in accordance with this section.

Pharmacy Operations and Drug Scheduling Act (PODSA) Bylaw 6 addresses Interchangeable Drugs as follows:

6. When acting under section 25.91 of the *Health Professions Act* a full pharmacist must determine interchangeability of drugs by reference to Health Canada's Declaration of Equivalence, indicated by the identification of a Canadian Reference Product in a Notice of Compliance for a generic drug.

That means that as long as you are interchanging according to section 25.91 above and are dispensing products that have been approved by Health Canada and received a Notice of Compliance with a Canadian Reference Product, or products that meet the definition of an interchangeable drug, no action may be brought against you.

Q. *Are other provinces making this change too?*

A. All of the provinces are adopting a similar approach, but there may be differences in the timing of the changes in each province.

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ENDNOTES:

1. As in the past "the same clinically significant formulation characteristics" means the formulation will result in similar clinical outcomes. Immediate-release capsules or tablets and liquid formulations are considered interchangeable. However, since the clinical outcomes and the intended reasons for using different dosage forms of topical, rectal, ophthalmic and otic preparations may be different, these products are noninterchangeable. For example, a topical cream may be noninterchangeable with a topical ointment; an ophthalmic suspension may be noninterchangeable with an ophthalmic solution.

2. Generic versions of immediate-release drugs have always been interchangeable as soon as they are approved by Health Canada. Now, generic sustained-release products with similar pharmacokinetics will be interchangeable as soon as they are approved for use in Canada.

   Generic products approved before 1995 were generally immediate-release products that met our definition of an interchangeable drug. Since 1995, every generic product approved by Health Canada has gone through a process called an "Abbreviated New Drug Submission." A generic drug approved through an Abbreviated New Drug Submission must be a pharmaceutical equivalent,[3] bioequivalent, have the same route of administration and the same conditions for use as the brand name product.[4] A generic product that meets this definition receives a Notice of Compliance that indicates which brand name product it was compared to. This brand name product is called the Canadian Reference Product. Under this new policy, the generic drug is immediately interchangeable with the Canadian Reference Product.

3. Food and Drug Regulations C.08.001
   "Pharmaceutical equivalent" means a new drug that, in comparison with another drug, contains identical amounts of the identical active medicinal ingredients, in comparable dosage forms, but that does not necessarily contain the same non-medicinal ingredients.

4. Food and Drug Regulations C.08.002.1(1)
   A manufacturer of a new drug may file an abbreviated new drug submission for the new drug where, in comparison with a Canadian reference product,
   a. The new drug is the pharmaceutical equivalent of the Canadian reference product;
   b. The new drug is bioequivalent with the Canadian reference product, based on the pharmaceutical and, where the Minister considers it necessary, bioavailability characteristics;
   c. The route of administration of the new drug is the same as that of the Canadian reference product; and
   d. The conditions of use for the new drug fall within the condition of use for the Canadian reference product.

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