

February 24, 2025



The Honourable David McGuinty, P.C., M.P. Minister of Public Safety  
The Honourable Mark Holland, P.C., M.P. Minister of Health  
The Honourable Mélanie Joly, P.C., M.P. Minister of Foreign Affairs  
Cc: The Right Honourable Justin Trudeau, P.C., M.P. Prime Minister of Canada

Dear Ministers McGuinty, Holland, and Joly,

On behalf of the Alliance for Safe Online Pharmacies (ASOP) Canada, we commend the Government of Canada for appointing a high profile and dedicated person (“fentanyl czar”) to address the pressing issue of synthetic opioids, particularly in the context of Canada-U.S. border relations. Kevin Brosseau’s appointment as the Commissioner of Canada’s Fight Against Fentanyl marks a significant step in mitigating the impact of fentanyl on our communities.

Most opioids seized in Canada are synthetic, which require targeted enforcement and regulatory interventions. Online platforms and nefarious websites have exacerbated the crisis, providing illicit marketplaces where unregulated synthetic opioids, including fentanyl and its analogues, can be easily accessed. According to the U.S. National Association of Boards of Pharmacy, over [50% of websites selling prescription medications operate illegally](#), and many of those websites can be accessed by Canadian consumers. Further, [studies continue](#) to indicate that social media platforms and search engines continue to facilitate the access and discovery of illegal opioid sales, despite commitments to remove such content. The trend is particularly increasing among [younger populations](#).

The U.S. Food and Drug Administration (FDA) has taken proactive steps to address this issue, convening [Online Controlled Substances Summits](#) to enhance cross-sector collaboration between government agencies, industry, and enforcement bodies. However, similar coordinated efforts in Canada remain underdeveloped. While initiatives like the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC) ISO-OSI program aim to disrupt illicit opioid trade, they do not sufficiently address the online dimensions of synthetic opioid sales. In light of the appointment of Commissioner Kevin Brosseau, we respectfully recommend the following actions to enhance the effectiveness of this role:

1. **Allocate Resources to Health Canada and Public Safety Canada to support monitoring and enforcement of illegal online sellers:** Provide these agencies with the necessary resources to identify and hold accountable illegal online sellers of synthetic opioids, including fentanyl and pre-cursor chemicals. Enhanced funding

and advanced technology-driven enforcement initiatives will empower the identification and removal of illicit online fentanyl vendors, operating both domestically in Canada and internationally.

2. **Foster Joint Health Canada – RCMP Collaboration to effectively pursue organized crime networks:** Encourage a collaborative approach between Health Canada and the RCMP to dismantle organized crime networks involved in the distribution of fentanyl and other synthetic opioids . A unified strategy ensures comprehensive enforcement and public health interventions.
3. **Hold Social Media and Internet Companies accountable:** Identify social media platforms, internet service providers, Domain Name Registrars, regulators, and brand holders that place Canadians at risk from online sales of fentanyl and illicit drug sales and precursor chemicals. The [U.S. FDA's Online Controlled Substances Summit](#) serves as a model where government convenes various stakeholders to address this issue collectively.
4. **Establish a Canadian Intellectual Property Rights (IPR) Centre:**
  - The U.S. [IPR Coordination Center](#) provides a central administrative office to coordinate monitoring and enforcement of IP-related crimes. The RCMP, Europol Interpol and the Mexican Revenue Service are the only international bodies to participate in the U.S. government-led initiative. By allocating resources and prioritizing the RCMP's partnership with the IPR Coordination Center, Canada can strengthen cooperation with the U.S. and international partners to combat illegal fentanyl sales.
  - **Proposal for a Canadian IPR Centre:** Create a dedicated Canadian IPR Centre to facilitate collaboration among federal, provincial, and municipal law enforcement agencies, as well as health authorities. This centre would streamline efforts to address the complexities of fentanyl and other synthetic opioid distribution and related crimes.

We are confident that these recommendations will bolster Canada's efforts to address domestic and cross-border priorities relating to fentanyl and other synthetic opioids, and protect the health and safety of its citizens. We look forward to supporting the Commissioner Brosseau and the Government of Canada in implementing these strategies.

To further discuss these recommendations and explore opportunities for collaboration, we would be delighted to provide any additional insights and work together to develop effective solutions.

Sincerely,

ASOP Canada

*The Alliance for Safe Online Pharmacies Canada is a programmatic chapter of ASOP Global. The Alliance for Safe Online Pharmacies (ASOP Global), a 501(c)(4) non-profit organization headquartered in Washington, D.C. with activities in U.S., Canada, Europe,*

*India, Latin America and Asia, is dedicated to protecting consumers around the world, ensuring safe access to medications, and combating illegal online drug sellers. ASOP Global has an expansive membership including non-profit public health organizations, international members, pharmacy members, as well as pharmaceutical manufacturers.*

*ASOP Canada's members and observers include:*

## **Members**

- Association des bannières et des chaînes de pharmacies du Québec
- Association québécoise des distributeurs en pharmacie
- Canadian Association of Pharmacy Distribution Management
- Canadian Generic Pharmaceutical Association
- Canadian Pharmacists Association
- Canadian Society of Hospital Pharmacists
- McKesson Canada
- Loblaw/Shoppers Drug Mart
- Neighbourhood Pharmacy Association of Canada
- OnPharm-United Pharma Group
- Pangea Group

## **Observers**

- National Association of Boards of Pharmacy
- Healthcare Excellence Canada
- GS1 Canada
- Mohawk MedBuy
- National Association of Pharmacy Regulatory Authorities