



Controlled Drug Substances Delivery

Purpose

This Regulatory Statement provides information and guidance to help pharmacy professionals and pharmacy owners deliver controlled drug substances (“CDS”) in accordance with

- Schedule E.14 of the bylaws of the College under the *Health Professions and Occupations Act* (“HPOA”), and
- Part 8 of the bylaws of the College under the *Pharmacy Operations and Drugs Scheduling Act* (“PODSA”),

collectively referred to in this Regulatory Statement as the “Standards”.

CDS delivery to clients outside the community pharmacy or telepharmacy presents special risks related to drug diversion or loss, client safety and privacy, quality of health care, and workplace safety. The College has established the Standards to prevent or mitigate those risks. The Standards are intended to ensure the delivery process is conducted safely, appropriately, and securely, while protecting client privacy and access to care. Pharmacy professionals and pharmacy owners must follow the Standards whenever prepared prescription CDS products are delivered to clients or their authorized representatives outside the pharmacy.

Background

The Standards replace and supersede the former Professional Practice Policy 71: Delivery of Opioid Agonist Treatment (“PPP-71”).

When initially developed in 2013, PPP-71 only permitted community pharmacists to deliver methadone for opioid agonist treatment (“OAT”) to a client’s home, and only if the prescriber authorized the delivery due to the client’s immobility.

In early 2020, the College made changes to PPP-71 allowing both delivery of other OAT drugs and delivery to any location suitable to the client, while removing the conditions that delivery must be needed due to client immobility and the prescriber must authorize delivery.

In March 2020, to help Canadians maintain their access to CDS medications while adhering to social distancing and self-isolation orders as the COVID-19 pandemic emerged, Health Canada issued a [section 56 exemption](#) to the *Controlled Drugs and Substances Act* (“CDSA”) permitting non-pharmacist individuals to deliver CDS prescription products to client’s homes or other locations on behalf of a pharmacist.

Based on that section 56 exemption, in April 2020 the College made additional pandemic-driven changes to PPP-71 allowing pharmacists to authorize other regulated health professionals with appropriate scope and competence to deliver OAT drugs to a client and to assess and witness the ingestion of OAT drugs, or, in exceptional circumstances, to authorize non-health professional employees to deliver OAT drugs. These exceptions remained in place until PPP-71 was rescinded and replaced by the Standards, effective April 1, 2026.

Health Canada’s section 56 exemption will remain in force until October 1, 2026, when it will expire and the authority for non-pharmacist delivery of CDS on behalf of a pharmacist will be permanently established in the new [Controlled Substances Regulations](#) under the CDSA.

Summary: CDS Delivery Standards under HPOA and PODSA

Note: These are not the Standards. The following is an integrated summary outlining the Standards as established separately in the HPOA bylaws and the PODSA bylaws. It is intended to facilitate understanding and compliance with the Standards. The bylaws are the only authoritative source for the Standards. Pharmacy professionals and pharmacy owners must ensure they are familiar with, understand, and comply with the Standards as established in the bylaws. The Standards prevail in the event of a conflict or inconsistency with anything in this Regulatory Statement.

1. Scope and Application

The Standards apply to full pharmacists working in community pharmacies or telepharmacies who deliver CDS directly to a client or client’s representative outside the pharmacy.

- Pharmacies are not required to offer delivery services.
- The Standards override parts of the OAT practice standards in Schedule E.12 of the HPOA Bylaws (sections 5–19).
- Some OAT practice standards (sections 20–21) still take precedence.

2. Key Definitions

Important defined terms include:

- “client’s representative” – authorized person receiving medications for the client.
- “common carrier” – shipping companies such as Canada Post or FedEx.
- “deliver” – to dispense a CDS referred to in a prescription by delivering, sending or transporting it from a pharmacy to the client or client’s representative at a location outside the pharmacy.
- “delivery service provider” – contracted adult individual or corporation delivering drugs (excluding pharmacy employees or volunteers).
- “location” – a pre-arranged delivery site with a verifiable street address.
- “rural or remote community” – communities designated as rural or remote in College bylaws.

3. Delivery is a Professional Act

Delivery of CDS is legally considered part of the pharmacist’s dispensing authority.

Pharmacists must use professional judgment to determine whether delivery is appropriate.

Conditions for delivery:

- Only a full pharmacist may deliver, or delegate delivery of, CDS products.
- Prescription must be valid, current, and authentic.
- Delivery must be safe and in the client’s best interest.
- Must comply with the CDSA, regulations under the CDSA, and exemptions to the CDSA.

4. Situations Where Delivery Must Not Occur

A pharmacist must not deliver if:

- The prescriber prohibits delivery.
- Delivery poses safety risks to clients, staff, or the public.
- The delivery location is unsuitable or insecure.

Pharmacists must attempt to resolve safety concerns with the client before refusing delivery.

5. Delivery Planning Requirements

Before delivery, pharmacists must arrange with the client or representative:

- A secure delivery location with a verifiable address.
- Estimated delivery time.
- A contingency plan if delivery cannot be completed or the recipient is unavailable.

Delivery cannot be made to:

- PO boxes.
- Lockers or rented mailboxes.
- Any other prohibited delivery locations.

6. Restrictions on Incentives

Pharmacists cannot be subject to quotas, targets, or incentives related to CDS delivery.

7. Who May Deliver CDS

Delivery can be performed by full pharmacists, or by the following under delegation by a full pharmacist:

- Regulated health professionals.
- Qualified pharmacy employees.
- Delivery service providers (contracted) — only if the medication does not require assessment or witnessed ingestion.

Important restrictions:

- Common carriers cannot deliver CDS products requiring client assessment or witnessed ingestion.
- Delivery providers must meet competency and legal requirements.

8. Delivery When Assessment or Witnessed Ingestion is Required

For OAT drugs and other CDS products requiring assessment or witnessing:

- Delivery personnel may facilitate virtual assessments via secure audio-video platforms.
- A pharmacist or authorized regulated health professional must be readily available to conduct the virtual interaction.

9. Manager Responsibilities

The pharmacy's manager must ensure that delivery personnel and pharmacy procedures meet minimum requirements:

9.1 Personnel Requirements

Delivery personnel must have:

- No relevant criminal history.
- Safe driving record (if delivering by vehicle).
- Current first aid training.
- OAT training every 3 years (if applicable).

9.2 Policies and Procedures

Managers must establish written procedures covering:

- Secure transportation.
- Safety protocols.
- Compliance with federal and provincial laws.
- Tracking and documentation.

9.3 Packaging and Security

Prescription CDS products must:

- Be prepared in the dispensary.
- Be sealed and concealed in additional packaging.
- Be transported in locked containers or lockable vehicle compartments.
- Never be visible to the public.

10. Tracking and Chain of Custody

Pharmacies must maintain continuous tracking of CDS packages during delivery.

Documentation must include:

- Every individual who handles the CDS package.
- Signatures of handlers.
- Confirmation of delivery to the client or representative.

11. Delivery Process Rules

Delivery personnel must:

- Verify the recipient's identity.
- Obtain the recipient's name and signature.
- Return documentation to the pharmacy the same day (or next business day for rural or remote deliveries).
- Return undelivered CDS to the pharmacy within the same day (or next business day for rural or remote deliveries).

12. Prohibited Actions for Delivery Personnel

Delivery personnel must not:

- Charge delivery fees to the client.
- Deliver or exchange money or other goods.
- Leave CDS products with unauthorized persons or minors.
- Leave CDS products unattended or in unlocked vehicles.
- Sell or discuss other goods with the client.
- Be accompanied by minors or unauthorized adults (except when unavoidable in rural or remote travel).

13. Loss or Theft Reporting

If a CDS product is lost or stolen during delivery:

- The pharmacy must notify the College within 24 hours.
- Must report to Health Canada within 10 days.
- Must provide the College with a copy of the report to Health Canada.

14. Documentation Requirements

Client records must include:

- Reason for delivering.
- Delivery location.
- Drug name and quantity.
- Delivery date/time.
- Identity and signatures of handlers and recipient.
- Assessment or witnessed ingestion details
- Undelivered or returned medication details.

Pharmacy records must include:

- Employee job descriptions and contracts.
- Contracts with delivery providers.
- Proof of compliance with requirements (criminal checks, training, etc.).

15. Responsibilities of Pharmacy Owners

Pharmacy owners must ensure:

- Adequate resources and systems for compliance.
 - Managers follow regulatory requirements and delivery policies.
 - Documentation is available for regulatory inspections.
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Commentary on the Standards

1. Expanded Scope of the Standards

The Standards impose new requirements on the delivery of non-OAT CDS drugs where none currently exist. This is an intentional change in regulatory oversight by the College, and the College is aware it may require some community pharmacies to adjust their workflows and business practices.

The policy and regulatory environment in which both the College and the pharmacy profession work is evolving. The opioid overdose public health emergency in British Columbia is continuing. Health Canada has moved to permanently establish the pandemic-era exemptions that temporarily expanded the authority of pharmacists to deliver, send or transport CDS. It has become clear that diversion and public safety risks are not limited to OAT drugs or to higher population density urban areas.

The stronger safeguards introduced by the College are aimed at reducing the risk of drug diversion and improving the safety of both clients and pharmacy professionals, while continuing to support access to care especially in rural or remote communities. Regulating the delivery of all CDS adds traceability and accountability, helping to ensure pharmacies are delivering safely and reducing the risk of diversion of all CDS.

2. Pick Up Versus Delivery

Under the Standards, delivery is the act of dispensing by delivering, sending or transporting a prepared prescription CDS product to the client or client's representative at a location outside the dispensing pharmacy.

Under the HPOA, dispensing of CDS is a restricted activity that only professional licensees of the College or another health professional regulatory college may perform or delegate while providing health services within the legislated scope of their respective professions.

Under the Standards, only a full pharmacist may delegate to non-College licensees the dispensing of prepared prescription CDS products from a pharmacy, including delivery of those products. In addition to the Standards, any delegation of dispensing by delivery is subject to the requirements in section 74(2) of the HPOA.

2.1 Pick Up Versus Delivery – Common Scenarios

- If a client or client's representative attends at the pharmacy in person to pick up the prepared product, then the dispense is complete when the product is handed over to the client or client's representative. No delivery is involved and the Standards do not apply.

- If a regulated health professional employed by a Health Authority or other agency attends at the pharmacy in person to pick up prepared products for one or more clients of a particular clinic or facility, or for one or more clients at a multi-unit residential building, and is doing so in accordance with their Health Authority or other agency employment duties and not through a delegation arrangement with the pharmacist, then
 - the pharmacist must be sure that the regulated health professional is authorized to act on behalf of each of the clients named in the prescriptions being dispensed (i.e., is a client's representative for each client),
 - each dispense is completed when the product is handed over by the pharmacist to the regulated health professional at the pharmacy,
 - the pharmacist is not delegating or taking responsibility for delivery to the client, and
 - the Standards do not apply.

- If a pharmacist hires or retains a regulated health professional to deliver the prepared product from the pharmacy to one or more clients at a particular clinic or facility, or to multiple clients at a multi-unit residential building, then

- it will be a delegation arrangement regardless of whether the act of dispensing may also be within the regulated health professional’s legislated scope of practice,
- the regulated health professional is acting on behalf of the pharmacist, not independently and not on behalf of the client named in the prescription,
- the pharmacist must ensure the regulated health professional confirms the identity of the client or client’s representative before product hand over,
- each dispense is completed when the product is handed over by the regulated health professional to the client or client’s representative at the location away from the pharmacy,
- the pharmacist remains responsible for delivery to the client, and
- the Standards apply.

3. Supplying CDS to Nurses at Community Health Facilities under CDSA Exemptions

If a pharmacist supplies CDS to a “community health facility” in accordance with the [applicable section 56 class exemption](#), the Standards do not apply because that activity is a supply of stock, not a delivery of prepared prescription products. The [corresponding section 56 class exemption](#) that permits nurses to conduct activities with CDS at various “community health locations” other than facilities does not apply to pharmacists or have the effect of expanding the authority that pharmacists otherwise have under the CDSA or the applicable section 56 class exemption.

4. Rural or Remote Communities

The Standards recognize that the circumstances faced by pharmacies and clients in rural or remote communities (as defined in the PODSA Bylaws) may be different compared to more populated urban areas. The Standards are designed to provide reasonable flexibility to support access to medications while enhancing public safety.

A pharmacist delivering to clients in a rural or remote community may use a sequence of delivery methods or delivery personnel to complete a delivery, provided that all requirements set out in the Standards, as well as in all applicable provincial and federal legislation, are met. Using more than one method or delivery provider in sequence to complete a delivery does not contravene the prohibition against subcontracting discussed below.

The deadlines for return to the pharmacy of documentation, undelivered drugs, and partially consumed doses are extended where delivery was to a client in a rural or remote community.

5. Contracted Delivery

A pharmacy may enter into contract with a corporation to deliver controlled drug substances that do not require assessment or witnessed ingestion.

The contractual terms and conditions must prohibit the corporation from subcontracting its responsibilities for any stage of the delivery process. This restriction is intended to protect the integrity of the delivery process. It does not prevent a pharmacist from using more than one contracted delivery service provider in sequence to complete a delivery to a client or client's representative, as long as all other applicable requirements are met.

The contractual terms and conditions must also require the corporation to provide proof of the following:

- All employees engaged in delivery of controlled drug substances are adults.
- Delivery drivers have no recent relevant criminal history, with "recent" and "relevant" determined by the pharmacy's manager using professional judgment.
- Delivery drivers operating a vehicle have a recent safe driving record, with "recent" determined by the pharmacy's manager using professional judgment.
- All other applicable requirements established in the Standards.

6. Receiving Payment

Delivery drivers cannot exchange money or any other items with the client, the client's representative or any other person at the point of handover of the prepared prescription CDS product package to the client or client's representative. This means payment for the delivered product cannot be collected by passing cash, personal cheques, gift cards, or any other item of value or stored value back to the delivery driver at the time of handover. This restriction does not prohibit a pharmacy from collecting payment by non-physical exchange options such as payment by credit card over telephone or by credit or debit card through remote POS devices operated by the driver. Other pre-delivery payment options that pharmacies may consider include prepayment, pre-authorized debit, and post-dated cheques.

7. Pharmacy Operating Hours

Delivery of prepared prescription CDS products sent from a pharmacy must occur within the pharmacy's operating hours. A pharmacy's operating hours means the time during which a pharmacist is present at the pharmacy to send the prescriptions initially, accept returns of partially consumed or undeliverable drugs, and be available for questions and virtual assessment and witnessed ingestion. Operating hours are not required to be the same hours that the pharmacy is physically open to the public.

8. Tracking the Package

The Standards do not require constant, live or real-time tracking by GPS or location services of every prepared prescription CDS product package that is delivered. Tracking through documentation and signatures in accordance with the Standards will ordinarily be sufficient to achieve compliance, however a pharmacy's manager must exercise professional judgement in determining what is sufficient tracking based on the circumstances of each package and must be prepared to justify their decisions to College staff if and when asked. The intent is that the pharmacy's manager will be able to produce a record showing how, when, and from who to whom, the package changed hands through the entire duration of the delivery process.

9. Packaging and Transport

The Standards require that the pharmacy package the CDS product in additional packaging, such as placing a bottle into a paper bag that conceals the information on the label that could identify the CDS. This additional package must be sealed in a way that is evident if it has been opened, such as taping or stapling the paper bag shut.

The Standards require the delivery driver to have a lockable area within the vehicle – either a compartment of the vehicle or a separate container – where packages containing CDS product packages are placed and stored during transport. This area must not be visible to the public when the vehicle is in motion or parked during a delivery. This may include storing the container under a seat or in the trunk, provided the contents are not visible through the vehicle windows.

10. Privacy in High-Density Housing

The Standards require identification of a location that, in the opinion of the pharmacist and the client or client's representative, protects the privacy and confidentiality of the client.

This does not preclude handover to the client or client's representative in building lobbies or other common areas if the client or client's representative is unable to meet the delivery driver at the door of their specific residential unit. Whether this will be appropriate for the handover interaction will depend on the professional judgment of the pharmacist in the circumstances and relevant considerations may include whether they are familiar with the building or its residents. If the client and delivery driver are inside a building, this may satisfy the privacy qualifier, however the location must be agreed upon by both parties.

The Code of Ethics sets out the ethical responsibility of the pharmacist to protect the interests of the client; even if the client presents as agreeable to the location, it is the

pharmacist's responsibility to ensure the interaction will be paused when other individuals approach or come within earshot.

11. Training requirements for delivery personnel

Training requirements for delivery personnel differ from those of pharmacists providing OAT. Training is required only for individuals who will be delivering controlled drug substances that require assessment or witnessed ingestion. Training must be refreshed at least every three years.

Additional training suitable for delivery drivers may become available through other partners. An existing example of suitable training for individuals delivering CDS is the British Columbia Centre on Substance Use *Foundational Skills for the Substance Use, Treatment, and Recovery Workforce Course*, available online for no cost at [Foundational Skills for the Substance Use, Treatment, and Recovery Workforce Course – BCCSU](#).

Training requirements are for individuals who only deliver CDS. It is not required for pharmacists or regulated health professionals who have the appropriate practice authority and competencies to virtually assess and witness the ingestion of a controlled drug.

12. Regulated Health Professionals

If a regulated health professional has the appropriate practice authority and competencies to assess a client and witness the ingestion of a controlled drug, they are permitted to do the assessment and witness ingestion within their respective scope of practice, either as delivery drivers or to perform a virtual assessment and witnessed ingestion.

If a regulated health professional does not have assessment or witnessed ingestion in their scope, they are still permitted to deliver, however they must initiate a virtual assessment or witnessed ingestion between the client and the pharmacist, or a regulated health professional who is confirmed by the pharmacy's manager to have the appropriate practice authority and competencies to assess a client and witness the ingestion

The scope of practice for a regulated health professional will be set out in their respective legislation. For the purposes of this Standard, social workers authorized under the *Social Workers Act* and emergency medical assistants licensed under the *Emergency Health Act* (except when employed by law enforcement) are included as regulated health professionals. The profession of emergency medical assistants has several licence categories including paramedics employed by BC Ambulance Service/BC Emergency Health Services (see section 8 of the [Emergency Medical Assistants Regulation](#)).

13. Remote Witnessed Ingestion

The College is developing virtual care standards but does not currently have any in force. There are no exceptional circumstances required in the Standards for utilizing virtual means to conduct assessment or witnessed ingestion. The use of a virtual platform for assessment and witnessed ingestion applies only to activities under this Standards. The Standards do not specify the location required for a virtual assessment or witnessed ingestion. The pharmacist or regulated health professional authorized to assess and witness ingestion should use professional judgment to determine the appropriateness of their location.

The virtual platform must be safe, secure, and appropriate, and must include both audio and video capabilities. The pharmacist or regulated health professional authorized to assess and witness ingestion must be readily available when prompted by the pharmacy employee or regulated health professional who is with the client.

Disclaimer: The information provided in this Regulatory Statement reflects the College's approach to interpreting and applying the Standards. This Regulatory Statement does not constitute legal advice. The College assumes no responsibility or liability to any person who relies on the information in this Regulatory Statement and the College disclaims all liability regarding such information. Persons intending to act on the basis of information provided in this Regulatory Statement are encouraged to first obtain independent legal advice from a lawyer who is authorized to practice law in British Columbia and is familiar with the person's circumstances.

Legislation

- HPOA s. 72(2), s. 74(2)
- HPOA Bylaws s. 117
- HPOA Bylaws Schedule E.14: Practice Standards - Controlled Drug Substances Delivery
- PODSA Bylaws Part 8 - Controlled Drug Substances Delivery

Additional Information

n/a

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