
















RE: Cocaine safe supply

From: Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>  
To: Tupper, Kenneth HLTH:EX <Kenneth.Tupper@gov.bc.ca>, Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>  
Cc: Salpeter, Rebecca MMHA:EX <Rebecca.Salpeter@gov.bc.ca>, Murray, Jill MMHA:EX <Jill.Murray@gov.bc.ca>, Birmingham, Lauren HLTH:EX <Lauren.Birmingham@gov.bc.ca>, Drummond, Sonia HLTH:EX <Sonia.Drummond@gov.bc.ca>  
Sent: March 2, 2023 4:06:03 PM PST  
Attachments: image002.png, image003.png  
CEO is Mike Forbes of Forbes Pharmacy Fame. Can assist, they may have a license but they do not have NOC, Pharmascience actually does. Product is dormant and no monograph so would suggest no approved indications currently. We would have to connect with HC and perhaps I will ask PMS for their previous monograph...

Sue

List of returned drug products

Status  	DIN  	Company  	Product  	Class  	PM  	Schedule  	# 
Cancelled Post Market	<a href="#">01962388</a>	SANDOZ CANADA INCORPORATED	COCAINE HYDROCHLORIDE TOP SOL 40MG/ML	Human	No	Narcotic (CDSA I)	1
Cancelled Post Market	<a href="#">02004062</a>	SANDOZ CANADA INCORPORATED	COCAINE HYDROCHLORIDE TOPICAL SOL 10%	Human	No	Narcotic (CDSA I)	1
Dormant	<a href="#">02006316</a>	PHARMASCIENCE INC	PMS-COCAINE HYDROCHLORIDE TOPICAL SOL 4%	Human	No	Narcotic (CDSA I)	1
Dormant	<a href="#">02006308</a>	PHARMASCIENCE INC	PMS-COCAINE HYDROCHLORIDE TOPICAL SOL 10%	Human	No	Narcotic (CDSA I)	1

From: Tupper, Kenneth HLTH:EX <Kenneth.Tupper@gov.bc.ca>  
Sent: March 2, 2023 3:39 PM  
To: Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>; Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>  
Cc: Salpeter, Rebecca MMHA:EX <Rebecca.Salpeter@gov.bc.ca>; Murray, Jill MMHA:EX <Jill.Murray@gov.bc.ca>; Birmingham, Lauren HLTH:EX <Lauren.Birmingham@gov.bc.ca>  
Subject: RE: Cocaine safe supply

Hi all – I coincidentally had a 1:1 booked with Darryl this afternoon, and he was very preoccupied with the QP issue. I don't have any back-story on this, but assume it's a pump-and-dump maneuver by the company to increase its stock price (which seems to have worked, having tripled in the last couple of weeks!)

Darryl has asked me to work with you (Sue/Gary, +/- others) to quickly pull together an IBN on the approved medical uses of cocaine, what a Health Canada dealer's license does (and doesn't) mean, what Health Canada's perspective on this story is, and how this relates to current provincial gov't direction on prescribed safer supply (i.e., focused on opioid options, not stimulants)

I've copied Lauren and will connect with her shortly to get something going, looking for input from the rest of you at some point tomorrow?

Thanks!  
Ken

**From:** Bouma, Susan HLTH:EX <[Susan.Bouma@gov.bc.ca](mailto:Susan.Bouma@gov.bc.ca)>  
**Sent:** Thursday, March 2, 2023 3:03 PM  
**To:** Murray, Jill MMHA:EX <[Jill.Murray@gov.bc.ca](mailto:Jill.Murray@gov.bc.ca)>; Tse, Gary HLTH:EX <[Gary.Tse@gov.bc.ca](mailto:Gary.Tse@gov.bc.ca)>; Tupper, Kenneth HLTH:EX <[Kenneth.Tupper@gov.bc.ca](mailto:Kenneth.Tupper@gov.bc.ca)>  
**Cc:** Salpeter, Rebecca MMHA:EX <[Rebecca.Salpeter@gov.bc.ca](mailto:Rebecca.Salpeter@gov.bc.ca)>; Barnes, Kristen M C MMHA:EX <[Kristen.Barnes@gov.bc.ca](mailto:Kristen.Barnes@gov.bc.ca)>; Ho, Edwin CITZ:EX <[Edwin.Ho@gov.bc.ca](mailto:Edwin.Ho@gov.bc.ca)>  
**Subject:** RE: Cocaine safe supply

It is a schedule 1 drug. Still requires a prescription. This does mean we can buy it from them tho. We should ask for a meeting and find out timing. 250g at the dealer is not a lot. Added Edwin.

Don't really care what QP comments, not helpful.

S

# National Drug Schedules

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**From:** Murray, Jill MMHA:EX <[Jill.Murray@gov.bc.ca](mailto:Jill.Murray@gov.bc.ca)>

**Sent:** March 2, 2023 11:24 AM

**To:** Bouma, Susan HLTH:EX <[Susan.Bouma@gov.bc.ca](mailto:Susan.Bouma@gov.bc.ca)>; Tse, Gary HLTH:EX <[Gary.Tse@gov.bc.ca](mailto:Gary.Tse@gov.bc.ca)>; Tupper, Kenneth HLTH:EX <[Kenneth.Tupper@gov.bc.ca](mailto:Kenneth.Tupper@gov.bc.ca)>

**Cc:** Salpeter, Rebecca MMHA:EX <[Rebecca.Salpeter@gov.bc.ca](mailto:Rebecca.Salpeter@gov.bc.ca)>; Barnes, Kristen M C MMHA:EX <[Kristen.Barnes@gov.bc.ca](mailto:Kristen.Barnes@gov.bc.ca)>

**Subject:** Cocaine safe supply

Hi All,

This came up in QP today (thanks for Kristen for flagging) – Interested in your thoughts!

Vancouver-Quilchena – The NDP's sole focus is on the public supply of drugs, ignoring needed work in treatment and recovery. Since the NDP decriminalized hard drugs, this company's stock price has doubled. Cocaine isn't prescribed or safe, and this is wrong. Commercializing cocaine as a business opportunity amounts to trafficking. Why has this premier allowed for the commercialization of cocaine?

[Adastra Labs Receives Health Canada Approval for the Amendment to Include Cocaine Under its Controlled Substances Dealer's License – Adastraholdings](#)

The amended license allows Adastra to interact with up to 250 grams of cocaine and to import coca leaves to manufacture and synthesize the substance.

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Jill

Jill Murray, PhD (*she/her*)  
Director, Overdose Strategic Priorities  
Overdose Emergency Response Centre  
Substance Use Policy Division  
Ministry of Mental Health and Addictions  
[jill.murray@gov.bc.ca](mailto:jill.murray@gov.bc.ca)

*I acknowledge with gratitude that I work on the unceded, traditional, and ancestral territory of the lək'wəŋən People of the Songhees and Esquimalt First Nations.*

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## List of returned drug products

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## RE: PMS Cocaine products

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From: Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>  
To: Kent Major <kmajor@pharmascience.com>, Diego Monsanto <dmonsant@pharmascience.com>  
Cc: Mike Dutton <MDutton@pharmascience.com>, Sarah Douglas <sdouglas@pharmascience.com>, Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>, Deirdre Cozier <dcozier@pharmascience.com>  
Sent: March 2, 2023 4:40:09 PM PST  
Attachments: image001.png  
Never dull

---

**From:** Kent Major <kmajor@pharmascience.com>  
**Sent:** March 2, 2023 4:37 PM  
**To:** Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>; Diego Monsanto <dmonsant@pharmascience.com>  
**Cc:** Mike Dutton <MDutton@pharmascience.com>; Sarah Douglas <sdouglas@pharmascience.com>; Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>; Deirdre Cozier <dcozier@pharmascience.com>  
**Subject:** RE: PMS Cocaine products

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Thanks for the heads up Sue.  
We will dig into the archives and revert.  
Diego, can you please initiate action?

Best regards,

---

**From:** Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>  
**Sent:** Thursday, March 2, 2023 7:22 PM  
**To:** Kent Major <kmajor@pharmascience.com>  
**Cc:** Mike Dutton <MDutton@pharmascience.com>; Sarah Douglas <sdouglas@pharmascience.com>; Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>  
**Subject:** PMS Cocaine products

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Hi Kent and gang!

As you can likely imagine this has caused quite a stir. We were entirely unaware of this being in flight.  
<https://vancouver.sun.com/news/local-news/bc-company-make-sell-cocaine>  
<https://adastraholdings.ca/adastra-labs-receives-health-canada-approval-for-the-amendment-to-include-cocaine-under-its-controlled-substances-dealers-license/>

You are the market holders, albeit dormant. Wondering if you have the old monograph kicking around so that I can show the MMHA senior exec what the indications were in the past.

Many thanks,  
Sue



***Susan Bouma (Sue). B.Sc(Pharm), RPh., R.PEBC, PharmD (she/her)***

Executive Director, Clinical Services and Evaluation  
Pharmaceutical, Laboratory and Blood Services Division  
Ministry of Health, BC

Ph: 250 952-2506 Fax: 250 952-2216

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***"If everyone is moving forward together, then success takes care of itself." --Henry Ford.***

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## FW: PMS Cocaine products

---

From: Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>  
To: XT:HLTH Solven, Suzanne <suzanne.solven@bcpharmacists.org>  
Cc: Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>  
Sent: March 2, 2023 4:50:16 PM PST  
Attachments: QP Summary Thursday March 2, 2023, image001.png  
Bugging PMS below so easiest to copy you from that, faster

And a second company now:

<https://www.newswire.ca/news-releases/sunshine-earth-labs-ltd-provides-corporate-update-849132157.html>

---

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## QP Summary Thursday March 2, 2023

---

From: HLTH Health Issues HLTH:EX <HealthIssues@gov.bc.ca>  
To: Achampong, Bernard HLTH:EX <Bernard.Achampong@gov.bc.ca>, Adams, Alix HLTH:EX <Alix.Adams@gov.bc.ca>, Anderson, Karen HLTH:EX <Karen.1.Anderson@gov.bc.ca>, Anderson, Kristy HLTH:EX <Kristy.Anderson@gov.bc.ca>, Arscott, Lindsay HLTH:EX <Lindsay.Arscott@gov.bc.ca>, Baade, Leah J HLTH:EX <Leah.Baade@gov.bc.ca>, Bedford, Sue HLTH:EX <Sue.Bedford@gov.bc.ca>, Bianco, Catherine HLTH:EX <Catherine.Bianco@gov.bc.ca>, Bilmer, Blake GCPE:EX <Blake.Bilmer@gov.bc.ca>, Biran, Kiran HLTH:EX <Kiran.Biran@gov.bc.ca>, Blemings, Roxanne HLTH:EX <Roxanne.Blemings@gov.bc.ca>, Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>, Bragg, Jacquelynn HLTH:EX <Jacquelynn.Bragg@gov.bc.ca>, Bryan, Frances HLTH:EX <Frances.Bryan@gov.bc.ca>, Bryden, Allison HLTH:EX <Allison.Bryden@gov.bc.ca>, Butler, Ally MMHA:EX <Ally.Butler@gov.bc.ca>, Cairns, Leann HLTH:EX <Leann.Cairns@gov.bc.ca>, Cameron, Mary HLTH:EX <Mary.Cameron@gov.bc.ca>, Capelli, John HLTH:EX <John.Capelli@gov.bc.ca>, Carnegie, Lynn HLTH:EX <Lynn.Carnegie@gov.bc.ca>, Casanova, Tamara MMHA:EX <Tamara.Casanova@gov.bc.ca>, Cascaden, Lori R HLTH:EX <Lori.Cascaden@gov.bc.ca>, Champoux, Ken HLTH:EX <Ken.Champoux@gov.bc.ca>, Chandler, Breanna HLTH:EX <Breanna.Chandler@gov.bc.ca>, Clarke, Diana HLTH:EX <Diana.Clarke@gov.bc.ca>, Clow, Holly MMHA:EX <Holly.Clow@gov.bc.ca>, Clucas, Amy HLTH:EX <Amy.Clucas@gov.bc.ca>, Cook, Heather G HLTH:EX <Heather.G.Cook@gov.bc.ca>, Cruse, Cassandra MMHA:EX <Cassandra.Cruse@gov.bc.ca>, Czapska, Joanna HLTH:EX <Joanna.Czapska@gov.bc.ca>, Dalzell, Kacey HLTH:EX <Kacey.Dalzell@gov.bc.ca>, Davison, Carolyn J MMHA:EX <Carolyn.Davison@gov.bc.ca>, Day, Meghan HLTH:EX <Meghan.Day@gov.bc.ca>, Den, Donald HLTH:EX <Donald.Den@gov.bc.ca>, Diacu, Mariana HLTH:EX <Mariana.Diacu@gov.bc.ca>, Downey, Gayle F HLTH:EX <Gayle.Downey@gov.bc.ca>, Drlik, Taryn HLTH:EX <Taryn.Drlik@gov.bc.ca>, Dube, Jonathan HLTH:EX <Jonathan.Dube@gov.bc.ca>, Elderfield, Andrew HLTH:EX <Andrew.Elderfield@gov.bc.ca>, Essa, Noren A HLTH:EX <Noren.Essa@gov.bc.ca>, Estiverne, Bethany MMHA:EX <Bethany.Estiverne@gov.bc.ca>, Fauman, Sheila HLTH:EX <Sheila.Fauman@gov.bc.ca>, Fazlagic, Tijana HLTH:EX <Tijana.Fazlagic@gov.bc.ca>, Fisher, Kiersten D HLTH:EX <Kiersten.Fisher@gov.bc.ca>, Frost, Andrea HLTH:EX <Andrea.Frost@gov.bc.ca>, Fuder, Leah S HLTH:EX <Leah.Fuder@gov.bc.ca>, Galt, Jamie HLTH:EX <Jamie.Galt@gov.bc.ca>, Garner, Sarah FIN:EX <Sarah.Garner@gov.bc.ca>, Garnham, Shelley HLTH:EX <Shelley.Garnham@gov.bc.ca>, GCPE Communications - Health <CommH@Victoria1.gov.bc.ca>, Gillespie, Jennifer HLTH:EX <Jennifer.Gillespie@gov.bc.ca>, Gold, Crystal HLTH:EX <Crystal.Gold@gov.bc.ca>, Gough, Jennifer HLTH:EX <Jennifer.Gough@gov.bc.ca>, Greenaway, Shelley E HLTH:EX <Shelley.Greenaway@gov.bc.ca>, Gudaitis, Paul HLTH:EX <Paul.Gudaitis@gov.bc.ca>, Gudmunson, Kathryn HLTH:EX <Kathryn.Gudmunson@gov.bc.ca>, Guerrero, Thomas HLTH:EX <Thomas.Guerrero@gov.bc.ca>, Hall, Shana A HLTH:EX <Shana.Hall@gov.bc.ca>, Halston, Leslie HLTH:EX <Leslie.Halston@gov.bc.ca>, Harper, Therese HLTH:EX <Therese.Harper@gov.bc.ca>, Heinze, Laura R HLTH:EX <Laura.Heinze@gov.bc.ca>, Henry, Bonnie HLTH:EX <Bonnie.Henry@gov.bc.ca>, hlth Executive Committee <hlthexec@Victoria1.gov.bc.ca>, hlth Key Contacts <hlthkeycontacts@Victoria1.gov.bc.ca>, Ho, Hilary HLTH:EX <Hilary.Ho@gov.bc.ca>, Holiday, Leah GCPE:EX <Leah.Holiday@gov.bc.ca>, Jayanthan, Janaki HLTH:EX <Janaki.Jayanthan@gov.bc.ca>, Jepsen, Donna HLTH:EX <Donna.Jepsen@gov.bc.ca>, Jobe, Patrick HLTH:EX <Patrick.Jobe@gov.bc.ca>, Johnson, Eugene HLTH:EX <Eugene.Johnson@gov.bc.ca>, Khalaileh, Aygul GCPE:EX <Aygul.Khalaileh@gov.bc.ca>, Kirke, Julie HLTH:EX <Julie.Kirke@gov.bc.ca>, Kolluru, Soumya HLTH:EX <Soumya.Kolluru@gov.bc.ca>, Kuo, I Fan HLTH:EX <IFan.Kuo@gov.bc.ca>, Larson, Eric HLTH:EX <Eric.Larson@gov.bc.ca>, Lo, Clifford HLTH:EX <Clifford.Lo@gov.bc.ca>, Logan, Katherine HLTH:EX <Katherine.Logan@gov.bc.ca>, Lyster, Leesa HLTH:EX <Leesa.Lyster@gov.bc.ca>, Maharaj, Raj HLTH:EX <Raj.Maharaj@gov.bc.ca>, Marsh, Jania HLTH:EX <Jania.Marsh@gov.bc.ca>, Maxson, Sandra OHCS:EX <Sandra.Maxson@gov.bc.ca>, Mazza, Amie HLTH:EX <Amie.Mazza@gov.bc.ca>, McConnan, Kelly MMHA:EX <Kelly.McConnan@gov.bc.ca>, McLachlan, Debbie HLTH:EX <Debbie.McLachlan@gov.bc.ca>, McLay, Jeremy HLTH:EX <Jeremy.McLay@gov.bc.ca>, McMullen, Bethany S C HLTH:EX <Bethany.McMullen@gov.bc.ca>, McQuillen, Kelly HLTH:EX <Kelly.McQuillen@gov.bc.ca>, Miramontes, Lara HLTH:EX <Lara.Miramontes@gov.bc.ca>, MMHA EXECUTIVE <MMHAEXEC@Victoria1.gov.bc.ca>, Murray, Jill MMHA:EX <Jill.Murray@gov.bc.ca>, Neilson, Karen HLTH:EX <Karen.Neilson@gov.bc.ca>, North, Naomi HLTH:EX <Naomi.North@gov.bc.ca>, Ogilvy, Lenore HLTH:EX <Lenore.Ogilvy@gov.bc.ca>, Okwengu, Mariam

AG:EX <Mariam.Okwengu@gov.bc.ca>, Ooms, Shana HLTH:EX <Shana.Ooms@gov.bc.ca>, Pang, Walton HLTH:EX <Walton.Pang@gov.bc.ca>, Parte, Maura HLTH:EX <Maura.Parte@gov.bc.ca>, Patterson, Catherine M HLTH:EX <Catherine.Patterson@gov.bc.ca>, Perzoff, Lara HLTH:EX <Lara.Perzoff@gov.bc.ca>, Poilievre, Tricia MMHA:EX <Tricia.Poilievre@gov.bc.ca>, Pop, Sorin HLTH:EX <Sorin.Pop@gov.bc.ca>, Prpich, Danielle HLTH:EX <Danielle.Prpich@gov.bc.ca>, Richards, Heather A HLTH:EX <Heather.Richards@gov.bc.ca>, Rinta, Darcy HLTH:EX <Darcy.Rinta@gov.bc.ca>, Robinson, Jonathan M HLTH:EX <Jonathan.Robinson@gov.bc.ca>, Rudden, Carolyn HLTH:EX <Carolyn.Rudden@gov.bc.ca>, Russo, Geneen HLTH:EX <Geneen.Russo@gov.bc.ca>, Sagar, Brian HLTH:EX <Brian.Sagar@gov.bc.ca>, Salpeter, Rebecca MMHA:EX <Rebecca.Salpeter@gov.bc.ca>, Sayani, Fatma HLTH:EX <Fatma.Sayani@gov.bc.ca>, Sharma, Anita HLTH:EX <Anita.Sharma@gov.bc.ca>, Sharma, Yashna HLTH:EX <Yashna.Sharma@gov.bc.ca>, Shaver, Julie HLTH:EX <Julie.Shaver@gov.bc.ca>, Shewchuk, Jack VSA:EX <Jack.Shewchuk@gov.bc.ca>, Shields, Sara HLTH:EX <Sara.Shields@gov.bc.ca>, Shust, Susan D HLTH:EX <Susan.Shust@gov.bc.ca>, Sihota, Arianna GCPE:EX <Arianna.Sihota@gov.bc.ca>, Sivananthan, Panmoli HLTH:EX <Panmoli.Sivananthan@gov.bc.ca>, Smith, Leah M EMCR:EX <Leah.Smith@gov.bc.ca>, Smith, Stephen HLTH:EX <Stephen.Smith@gov.bc.ca>, Stanker, Cheryl HLTH:EX <Cheryl.Stanker@gov.bc.ca>, Sterloff, Trish HLTH:EX <Trish.Sterloff@gov.bc.ca>, Strachan, Brande L HLBC:EX <Brande.Strachan@gov.bc.ca>, Sundhu, Sandra HLBC:EX <Sandra.Sundhu@gov.bc.ca>, Therrien, Darlene HLTH:EX <Darlene.Therrien@gov.bc.ca>, Thistle-Walker, Carlene CITZ:EX <Carlene.ThistleWalker@gov.bc.ca>, Thomas, Gerald HLTH:EX <Gerald.Thomas@gov.bc.ca>, Tiwari, Deepika HLTH:EX <Deepika.Tiwari@gov.bc.ca>, Tupper, Kenneth HLTH:EX <Kenneth.Tupper@gov.bc.ca>, Uyeno, Kelly HLTH:EX <Kelly.Uyeno@gov.bc.ca>, van der Leer, Gerrit HLTH:EX <Gerrit.vanderLeer@gov.bc.ca>, Vinhas, Alessandra GCPE:EX <Alessandra.Vinhas@gov.bc.ca>, Voggenreiter, Christine HLTH:EX <Christine.Voggenreiter@gov.bc.ca>, Warren, Leanne HLTH:EX <Leanne.Warren@gov.bc.ca>, Watt, Rebecca HLTH:EX <Rebecca.Watt@gov.bc.ca>, Will, Jordan HLTH:EX <Jordan.Will@gov.bc.ca>, Williams, Courtney L HLTH:EX <Courtney.Williams@gov.bc.ca>, Wiman, Holly A MMHA:EX <Holly.Wiman@gov.bc.ca>, Wong, Kendra GCPE:EX <Kendra.Wong@gov.bc.ca>, Wong, Shirley M HLTH:EX <Shirley.Wong@gov.bc.ca>, Wright, Martin P HLTH:EX <Martin.P.Wright@gov.bc.ca>, YeungThompson, Rachel HLTH:EX <Rachel.YeungThompson@gov.bc.ca>, Youngs, Kirsten R HLTH:EX <Kirsten.Youngs@gov.bc.ca>

Cc: HLTH Health Issues HLTH:EX <HealthIssues@gov.bc.ca>

Sent: March 2, 2023 11:22:10 AM PST

**QP Summary Thursday March 2, 2023:** Health related topics / MMHA related topics

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Page 17 of 69

Withheld pursuant to/removed as

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Full transcript of yesterday's QP: <https://www.leg.bc.ca/documents-data/debate-transcripts/42nd-parliament/4th-session/20230301pm-House-Blues>

**Jasmine Lowey**

A/ Risk and Issues Analyst

Corporate Issues and Client Relations

Ministry of Health | Phone: 778 974-2863

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To: Kent Major <kmajor@pharmascience.com>, Diego Monsanto <dmonsant@pharmascience.com>  
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<https://www.newswire.ca/news-releases/sunshine-earth-labs-ltd-provides-corporate-update-849132157.html>

second company now.

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**Cc:** Mike Dutton <MDutton@pharmascience.com>; Sarah Douglas <sdouglas@pharmascience.com>; Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>; Deirdre Cozier <dcozier@pharmascience.com>  
**Subject:** RE: PMS Cocaine products

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Thanks for the heads up Sue.  
We will dig into the archives and revert.  
Diego, can you please initiate action?

Best regards,

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**Sent:** Thursday, March 2, 2023 7:22 PM  
**To:** Kent Major <kmajor@pharmascience.com>  
**Cc:** Mike Dutton <MDutton@pharmascience.com>; Sarah Douglas <sdouglas@pharmascience.com>; Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>  
**Subject:** PMS Cocaine products

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Hi Kent and gang!

As you can likely imagine this has caused quite a stir. We were entirely unaware of this being in flight.  
<https://vancouver.sun.com/news/local-news/bc-company-make-sell-cocaine>  
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You are the market holders, albeit dormant. Wondering if you have the old monograph kicking around so that I can show the MMHA senior exec what the indications were in the past.

Many thanks,  
Sue



***Susan Bouma (Sue). B.Sc(Pharm), RPh., R.PEBC, PharmD (she/her)***

Executive Director, Clinical Services and Evaluation  
Pharmaceutical, Laboratory and Blood Services Division  
Ministry of Health, BC

Ph: 250 952-2506 Fax: 250 952-2216

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## RE: Cocaine safe supply

---

From: Murray, Jill MMHA:EX <Jill.Murray@gov.bc.ca>  
To: Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>, Tupper, Kenneth HLTH:EX <Kenneth.Tupper@gov.bc.ca>, Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>  
Cc: Salpeter, Rebecca MMHA:EX <Rebecca.Salpeter@gov.bc.ca>, Birmingham, Lauren HLTH:EX <Lauren.Birmingham@gov.bc.ca>  
Sent: March 2, 2023 5:29:59 PM PST  
Attachments: image001.png

Hi Sue,  
Thanks - we received an email from Sunshine Labs (which did not speak to any specific medications) and I prepared the response in consultation with Gary. The response is with Darryl now.  
Jill

Jill Murray, PhD (*she/her*)  
Director, Overdose Strategic Priorities  
Overdose Emergency Response Centre  
Substance Use Policy Division  
Ministry of Mental Health and Addictions  
[jill.murray@gov.bc.ca](mailto:jill.murray@gov.bc.ca)

*I acknowledge with gratitude that I work on the unceded, traditional, and ancestral territory of the ləkʷəŋən People of the Songhees and Esquimalt First Nations.*

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And now a second company you guys:

<https://www.newswire.ca/news-releases/sunshine-earth-labs-ltd-provides-corporate-update-849132157.html>

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Darryl has asked me to work with you (Sue/Gary, +/- others) to quickly pull together an IBN on the approved medical uses of cocaine, what a Health Canada dealer's license does (and doesn't) mean, what Health Canada's perspective on this story is, and how this relates to current provincial gov't direction on prescribed safer supply (i.e., focused on opioid options, not stimulants)

I've copied Lauren and will connect with her shortly to get something going, looking for input from the rest of you at some point tomorrow?

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**Subject:** RE: Cocaine safe supply

It is a schedule 1 drug. Still requires a prescription. This does mean we can buy it from them tho. We should ask for a meeting and find out timing. 250g at the dealer is not a lot. Added Edwin.

Don't really care what QP comments, not helpful.

S

# National Drug Schedules

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**Cc:** Salpeter, Rebecca MMHA:EX <[Rebecca.Salpeter@gov.bc.ca](mailto:Rebecca.Salpeter@gov.bc.ca)>; Barnes, Kristen M C MMHA:EX <[Kristen.Barnes@gov.bc.ca](mailto:Kristen.Barnes@gov.bc.ca)>



**Subject:** Cocaine safe supply

Hi All,

This came up in QP today (thanks for Kristen for flagging) – Interested in your thoughts!

Vancouver-Quilchena – The NDP's sole focus is on the public supply of drugs, ignoring needed work in treatment and recovery. Since the NDP decriminalized hard drugs, this company's stock price has doubled. Cocaine isn't prescribed or safe, and this is wrong. Commercializing cocaine as a business opportunity amounts to trafficking. Why has this premier allowed for the commercialization of cocaine?

[Adastra Labs Receives Health Canada Approval for the Amendment to Include Cocaine Under its Controlled Substances Dealer's License – Adastraholdings](#)

The amended license allows Adastra to interact with up to 250 grams of cocaine and to import coca leaves to manufacture and synthesize the substance.

Copyright

Jill

Jill Murray, PhD (*she/her*)  
Director, Overdose Strategic Priorities  
Overdose Emergency Response Centre  
Substance Use Policy Division  
Ministry of Mental Health and Addictions  
[jill.murray@gov.bc.ca](mailto:jill.murray@gov.bc.ca)

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## RE: PMS Cocaine products

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Sent: March 3, 2023 5:48:02 AM PST  
Attachments: Package insert-pms-COCAINE HYDROCHLORIDE 4% and 10% topical solution.pdf, image001.png

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Good morning Sue and Kent,

Please find attached an archived copy of the package insert.

Kind regards,  
Diego

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Hi Kent and gang!

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<https://vancouver.sun.com/news/local-news/bc-company-make-sell-cocaine>

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You are the market holders, albeit dormant. Wondering if you have the old monograph kicking around so that I can show the MMHA senior exec what the indications were in the past.

Many thanks,  
Sue



***Susan Bouma (Sue). B.Sc(Pharm), RPh., R.PEBC, PharmD (she/her)***

Executive Director, Clinical Services and Evaluation  
Pharmaceutical, Laboratory and Blood Services Division  
Ministry of Health, BC  
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PROSPECTUS

**pms-<sup>N</sup> Cocaine Hydrochloride  
Topical Solution**

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Pharmascience Inc., Montréal, Canada

00002999-1

Copyright

PACKAGE INSERT

**pms-<sup>N</sup>Cocaine Hydrochloride  
Topical Solution**

Copyright

5 x 5 mL

Copyright

**pms-<sup>N</sup>Cocaine Hydrochloride  
Topical Solution**

DIN 02006316

Pharmascience Inc., Montreal, Canada

00002999-1

## Re: PMS Cocaine products

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Sent: March 3, 2023 8:03:47 AM PST  
Attachments: image001.png  
Thanks Diego

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## RE: Cocaine safe supply

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Sent: March 3, 2023 8:09:17 AM PST  
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<https://www.theglobeandmail.com/news/national/is-free-heroin-just-a-quick-fix/article18214429/>  
<https://thepostmillennial.com/drug-addicts-do-not-benefit-from-harm-reduction-but-from-rehabilitation-and-treatment>

I previously looked up Dr. Stanley de Vlaming when Sunshine Labs (has DL for DAM) first contacted us. He has been in this space as early as 2005. There are several articles from around that time where he doesn't support providing DAM or safe injection sites but it has been many years – views may have changed.

---

**From:** Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>  
**Sent:** March 2, 2023 9:52 PM  
**To:** Tupper, Kenneth HLTH:EX <Kenneth.Tupper@gov.bc.ca>; Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>  
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**Subject:** Re: Cocaine safe supply

<https://forbesgroup.ca/>

Also owns a mobile casino

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---

**From:** Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>  
**Sent:** Thursday, March 2, 2023 7:04:50 PM  
**To:** Tupper, Kenneth HLTH:EX <Kenneth.Tupper@gov.bc.ca>; Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>  
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Tamar has said he was quite involved in DTES for a long time. I am not familiar with him though.

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---

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Super interesting . . . Sue, does the name Dr. Stanley de Vlaming ring any bells for you? (he's their Chief Medical Officer – used to be a methadone prescriber in VCH region): <https://www.sunshinelabs.life/about#meet-our-team>

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**From:** Murray, Jill MMHA:EX <[Jill.Murray@gov.bc.ca](mailto:Jill.Murray@gov.bc.ca)>

**Sent:** March 2, 2023 11:24 AM

**To:** Bouma, Susan HLTH:EX <[Susan.Bouma@gov.bc.ca](mailto:Susan.Bouma@gov.bc.ca)>; Tse, Gary HLTH:EX <[Gary.Tse@gov.bc.ca](mailto:Gary.Tse@gov.bc.ca)>; Tupper, Kenneth HLTH:EX <[Kenneth.Tupper@gov.bc.ca](mailto:Kenneth.Tupper@gov.bc.ca)>

**Cc:** Salpeter, Rebecca MMHA:EX <[Rebecca.Salpeter@gov.bc.ca](mailto:Rebecca.Salpeter@gov.bc.ca)>; Barnes, Kristen M C MMHA:EX <[Kristen.Barnes@gov.bc.ca](mailto:Kristen.Barnes@gov.bc.ca)>

**Subject:** Cocaine safe supply

Hi All,

This came up in QP today (thanks for Kristen for flagging) – Interested in your thoughts!

Vancouver-Quilchena – The NDP's sole focus is on the public supply of drugs, ignoring needed work in treatment and recovery. Since the NDP decriminalized hard drugs, this company's stock price has doubled. Cocaine isn't prescribed or safe, and this is wrong. Commercializing cocaine as a business opportunity amounts to trafficking. Why has this premier allowed for the commercialization of cocaine?

[Adastra Labs Receives Health Canada Approval for the Amendment to Include Cocaine Under its Controlled Substances Dealer's License – Adastraholdings](#)

The amended license allows Adastra to interact with up to 250 grams of cocaine and to import coca leaves to manufacture and synthesize the substance.

Jill

Jill Murray, PhD (*she/her*)  
Director, Overdose Strategic Priorities  
Overdose Emergency Response Centre  
Substance Use Policy Division  
Ministry of Mental Health and Addictions  
[jill.murray@gov.bc.ca](mailto:jill.murray@gov.bc.ca)

*I acknowledge with gratitude that I work on the unceded, traditional, and ancestral territory of the ɫəᑭʷəŋən People of the Songhees and Esquimalt First Nations.*

*This e-mail is intended solely for the person or entity to which it is addressed and may contain confidential and/or privileged information. Any review, dissemination, copying, printing or other use of this e-mail by persons or entities other than the addressee is prohibited. If you have received this e-mail in error, please contact the sender immediately and delete the material from any computer.*

## 2023-03-02 - IBN - Cocaine Dealers License\_LB.docx

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From: Birmingham, Lauren HLTH:EX <Lauren.Birmingham@gov.bc.ca>  
To: Murray, Jill MMHA:EX <Jill.Murray@gov.bc.ca>, Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>, Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>, Salpeter, Rebecca MMHA:EX <Rebecca.Salpeter@gov.bc.ca>  
Sent: March 3, 2023 3:24:45 PM PST  
Attachments: 2023-03-02 - IBN - Cocaine Dealers License\_LB.docx  
Hi all,

This is still very much a work in progress however, seeking input to be included for a quick turn around by end of day (ideally)...

Thank you!  
Lauren

Page 42 of 69 to/à Page 46 of 69

Withheld pursuant to/removed as

s.13

## RE: 1248258 Sunshine Labs

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From: Tse, Gary HLTH:EX  
To: Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>  
Sent: March 3, 2023 5:14:12 PM PST  
Attachments: RE: Enquiry

Finally heard back from HC Office of Controlled Substances ... I reached out back in January to the office to figure out what Sunshine Lab can or can't do in regards to DAM before setting up a meeting.

Of importance, sale of DAM by a Licensed Dealer to a registered pharmacy is permitted. This holds true for cocaine based on my interpretation of the document referenced in their reply.

<https://bc.ctvnews.ca/b-c-company-clarifies-retracts-statements-about-selling-cocaine-1.6297991>

This news article references Sunshine Lab as well.

In my response, I will ask OCS for information on both Sunshine Labs for DAM and Adastral for cocaine to clarify their authorized activities. Is there anything else you want me to include to ask them?

Gary

---

**From:** Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>  
**Sent:** March 3, 2023 9:58 AM  
**To:** Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>  
**Subject:** RE: 1248258 Sunshine Labs

thx

---

**From:** Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>  
**Sent:** March 3, 2023 8:20 AM  
**To:** Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>  
**Subject:** 1248258 Sunshine Labs

Response to Sunshine Lab email

Gary Tse (he/him) | Pharmacist  
Clinical Lead, Substance Use | Pharmaceutical Care Initiatives | Clinical Services and Evaluation Branch | Pharmaceutical, Laboratory and Blood Services Division | BC Ministry of Health  
1515 Blanshard St | PO BOX 9652 STN PROV GOVT | Victoria BC | V8W 9P4  
t: 778-405-3582 e: [gary.tse@gov.bc.ca](mailto:gary.tse@gov.bc.ca)

*I respectfully acknowledge that the land on which I live and work is on the traditional territory of the Lekwungen-speaking people of the Songhees and Esquimalt Nation.*

## RE: Enquiry

From: cds / sdc (HC/SC) <cds-sdc@hc-sc.gc.ca>, Foss, Chris (HC/SC) <chris.foss@hc-sc.gc.ca>  
To: Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>  
Sent: March 3, 2023 3:08:08 PM PST  
Attachments: image001.gif

**[EXTERNAL] This email came from an external source. Only open attachments or links that you are expecting from a known sender.**

Good day:

Thank you for your enquiry. In order to provide regulatory advice on this matter, please provide the name of the Licensed Dealer and the licence number. We may then provide clarity on the activities authorized under the Controlled Substances Dealer's Licence. However, the Licensed Dealer should be fully aware of the activities authorized under their licence and provide you with sufficient clarity.

With respect to the sale/provision of a controlled substance such as Diacetylmorphine by a Licensed Dealer to a registered pharmacy, such sale/provision is permitted under section 25.1 of the Narcotic Control Regulations found here: [C.R.C., c. 1041.pdf \(justice.gc.ca\)](#)

With respect to a Notice of Compliance, which our office does not authorize, you may contact a representative of the Therapeutic Products Directorate of Health Canada. Please note our office does not provide any guidance documents regarding the legal requirements for the compounding of Diacetylmorphine.

If you have any questions, please contact our office at [cds-sdc@hc-sc.gc.ca](mailto:cds-sdc@hc-sc.gc.ca)

Regards,  
Chris

Christopher Foss  
Controlled Drugs Section / Authorizations Division  
Office of Controlled Substances / Controlled Substances and Cannabis Branch  
Health Canada / Government of Canada  
[cds-sdc@hc-sc.gc.ca](mailto:cds-sdc@hc-sc.gc.ca)

**\*\*Note that our email address has changed. Please update your contacts accordingly\*\***

Section des drogues contrôlées / Division des autorisations  
Bureau des substances contrôlées / Direction générale des substances contrôlées et du cannabis  
Santé Canada / Gouvernement du Canada  
[cds-sdc@hc-sc.gc.ca](mailto:cds-sdc@hc-sc.gc.ca)

**\*\*Veuillez noter que notre adresse de courriel a changé. Veuillez mettre à jour vos contacts en conséquence\*\***



Government  
of Canada

Gouvernement  
du Canada

Canada

---

**From:** Tse, Gary HLTH:EX <[Gary.Tse@gov.bc.ca](mailto:Gary.Tse@gov.bc.ca)>  
**Sent:** 2023-01-30 2:34 PM  
**To:** ocs / bsc (HC/SC) <[ocs-bsc@hc-sc.gc.ca](mailto:ocs-bsc@hc-sc.gc.ca)>  
**Subject:** Enquiry

Hello,

I was approached by a company that has a Dealer's License for diacetylmorphine (DAM). I tried to look up what the Dealer's License allows them to do with DAM but I wasn't understanding to what extent they can do in terms of

production and sale. Can you provide some clarity on whether they are allowed to compound DAM and provide to a licensed pharmacy according to [POL-0051](#)? They do not have a Notice of Compliance which to my understanding is required for them to legally manufacture and market a commercial product. Do you have any guidance documents regarding legal requirements for compounding of DAM?

If it is easier to speak over a call to explain these nuances, I'm more than happy to do so.

Thank you,  
Gary

Gary Tse (he/him) | Pharmacist  
Clinical Lead, Substance Use | Pharmaceutical Care Initiatives | Clinical Services and Evaluation Branch | Pharmaceutical, Laboratory and Blood Services Division | BC Ministry of Health  
1515 Blanshard St | PO BOX 9652 STN PROV GOVT | Victoria BC | V8W 9P4  
t: 778-405-3582 e: [gary.tse@gov.bc.ca](mailto:gary.tse@gov.bc.ca)

*I respectfully acknowledge that the land on which I live and work is on the traditional territory of the Lekwungen-speaking people of the Songhees and Esquimalt Nation.*



## FW: draft IBN - cocaine & Dealer's Licenses

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From: Tupper, Kenneth HLTH:EX <Kenneth.Tupper@gov.bc.ca>  
To: Birmingham, Lauren HLTH:EX <Lauren.Birmingham@gov.bc.ca>, Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>, Murray, Jill MMHA:EX <Jill.Murray@gov.bc.ca>  
Cc: Salpeter, Rebecca MMHA:EX <Rebecca.Salpeter@gov.bc.ca>  
Sent: March 3, 2023 5:14:17 PM PST  
Attachments: 2023-03-03 - IBN - Cocaine Dealers License\_for ADM review.docx  
Fyi – thanks for your help in drafting/review under tight timelines! Hoping this incorporates everything accurately enough

---

**From:** Tupper, Kenneth HLTH:EX  
**Sent:** Friday, March 3, 2023 5:13 PM  
**To:** Sturtevant, Darryl MMHA:EX <Darryl.Sturtevant@gov.bc.ca>  
**Cc:** Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>; Salpeter, Rebecca MMHA:EX <Rebecca.Salpeter@gov.bc.ca>; Murray, Jill MMHA:EX <Jill.Murray@gov.bc.ca>  
**Subject:** draft IBN - cocaine & Dealer's Licenses

Hi Darryl – please find attached a draft IBN for your to review on the recent concerns about Health Canada’s Dealer’s License amendments to BC-based companies to include cocaine (and which these companies subsequently misled the public on by suggesting cocaine might become available as commercial safer supply products).

Thanks  
Ken

## RE: 1248258 Sunshine Labs

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From: Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>  
To: Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>  
Sent: March 3, 2023 5:17:44 PM PST

We may need to know more on their other substances...psilocybin, NMDA...how can they manufacture and sell these?  
What restrictions are there...

Go home! Lol

---

**From:** Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>  
**Sent:** March 3, 2023 5:14 PM  
**To:** Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>  
**Subject:** RE: 1248258 Sunshine Labs

Finally heard back from HC Office of Controlled Substances ... I reached out back in January to the office to figure out what Sunshine Lab can or can't do in regards to DAM before setting up a meeting.  
Of importance, sale of DAM by a Licensed Dealer to a registered pharmacy is permitted. This holds true for cocaine based on my interpretation of the document referenced in their reply.

<https://bc.ctvnews.ca/b-c-company-clarifies-retracts-statements-about-selling-cocaine-1.6297991>

This news article references Sunshine Lab as well.

In my response, I will ask OCS for information on both Sunshine Labs for DAM and Adastra for cocaine to clarify their authorized activities. Is there anything else you want me to include to ask them?

Gary

---

**From:** Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>  
**Sent:** March 3, 2023 9:58 AM  
**To:** Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>  
**Subject:** RE: 1248258 Sunshine Labs

thx

---

**From:** Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>  
**Sent:** March 3, 2023 8:20 AM  
**To:** Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>  
**Subject:** 1248258 Sunshine Labs

Response to Sunshine Lab email

Gary Tse (he/him) | Pharmacist  
Clinical Lead, Substance Use | Pharmaceutical Care Initiatives | Clinical Services and Evaluation Branch | Pharmaceutical, Laboratory and Blood Services Division | BC Ministry of Health  
1515 Blanshard St | PO BOX 9652 STN PROV GOVT | Victoria BC | V8W 9P4  
t: 778-405-3582 e: [gary.tse@gov.bc.ca](mailto:gary.tse@gov.bc.ca)

*I respectfully acknowledge that the land on which I live and work is on the traditional territory of the Lekwungen-speaking people of the Songhees and Esquimalt Nation.*

## RE: update: another dealers license announcement

---

From: Sturtevant, Darryl MMHA:EX <Darryl.Sturtevant@gov.bc.ca>  
To: Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>  
Cc: Tupper, Kenneth HLTH:EX <Kenneth.Tupper@gov.bc.ca>, Salpeter, Rebecca MMHA:EX <Rebecca.Salpeter@gov.bc.ca>, Moneo, Mitch HLTH:EX <Mitch.Moneo@gov.bc.ca>, Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>, Birmingham, Lauren HLTH:EX <Lauren.Birmingham@gov.bc.ca>  
Sent: March 5, 2023 2:31:58 PM PST

Thanks Sue. This is very helpful, much appreciated. I don't want to proactively reach out to them at this point.

Darryl

---

**From:** Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>  
**Sent:** March 3, 2023 2:48 PM  
**To:** Sturtevant, Darryl MMHA:EX <Darryl.Sturtevant@gov.bc.ca>  
**Cc:** Tupper, Kenneth HLTH:EX <Kenneth.Tupper@gov.bc.ca>; Salpeter, Rebecca MMHA:EX <Rebecca.Salpeter@gov.bc.ca>; Moneo, Mitch HLTH:EX <Mitch.Moneo@gov.bc.ca>; Tse, Gary HLTH:EX <Gary.Tse@gov.bc.ca>; Birmingham, Lauren HLTH:EX <Lauren.Birmingham@gov.bc.ca>  
**Subject:** RE: update: another dealers license announcement

Hi Darryl:

Good question, I believe it could be us (PLBSD), note "could"-let me explain. The bulk of the products from that facility do not fall in our jurisdiction in any way currently; cocaine could as it is a Schedule 1 drug that requires a prescription to provide it to the public. Our involvement would be at the end product stage though, i.e. when the compound or manufactured final consumable product is available and we want to cover it financially somehow in the province. I believe Adastra will be looking to produce cocaine powder that could be sold under that dealer's license to physicians, pharmacists, hospital employees, other dealers, the Minister, or someone with a section 56 exemption (none of this applies to DAM). These persons need to be known to the dealer and they must follow the rules as they apply to them once they receive the product.

This could help us as we do know we need the powder for compounding cocaine for inhalation. This should not look any different than other licensed raw pharmaceutical producer. I would postulate this is how and why Health Canada authorized this expansion to their license. That process never usually involves us; it is a federal process. Further, we do not normally liaise with raw pharmaceutical providers during our PLBSD business processes UNLESS we need information to support drug shortages (for compounding, confirming stock levels or pricing). Pharmacies will, hospitals will and will look to companies they are familiar with and are high quality providers. We have established reputable providers for cocaine already, eg. Medisca has cocaine. Lynn did a lot of outreach previously as we considered how we would add these to the PSS formulary.

To sum up: I am not aware of a formal obligation for HC or the producer to consult with us. The CEO of Adastra is a pharmacist and I could call him if we are wanting to connect more proactively. I would probably do that with our College Registrar in tow. Let me know if you would like us to do so.

Sue

---

**From:** Sturtevant, Darryl MMHA:EX <Darryl.Sturtevant@gov.bc.ca>  
**Sent:** March 3, 2023 1:35 PM  
**To:** Bouma, Susan HLTH:EX <Susan.Bouma@gov.bc.ca>  
**Cc:** Tupper, Kenneth HLTH:EX <Kenneth.Tupper@gov.bc.ca>; Salpeter, Rebecca MMHA:EX <Rebecca.Salpeter@gov.bc.ca>  
**Subject:** FW: update: another dealers license announcement

Hi Sue. Do you have any insights on what Adastra means in the yellow highlighted section below? Is there a formal obligation for them to consult the province and if so, would that be your division?

Thanks

Darryl

---

**From:** Holoiday, Leah GCPE:EX <[Leah.Holoiday@gov.bc.ca](mailto:Leah.Holoiday@gov.bc.ca)>

**Sent:** March 3, 2023 1:25 PM

**To:** Sturtevant, Darryl MMHA:EX <[Darryl.Sturtevant@gov.bc.ca](mailto:Darryl.Sturtevant@gov.bc.ca)>; Massey, Christine MMHA:EX <[Christine.Massey@gov.bc.ca](mailto:Christine.Massey@gov.bc.ca)>

**Cc:** Cruse, Cassandra MMHA:EX <[Cassandra.Cruse@gov.bc.ca](mailto:Cassandra.Cruse@gov.bc.ca)>; Butler, Ally MMHA:EX <[Ally.Butler@gov.bc.ca](mailto:Ally.Butler@gov.bc.ca)>

**Subject:** RE: update: another dealers license announcement

Another update – Adastra just released the following statement: <https://adastraholdings.ca/adastra-labs-clarifies-and-retracts-certain-disclosure-related-to-its-receipt-of-health-canada-approval-for-the-amendment-to-include-cocaine-under-its-controlled-substances-licence/>

Darryl – do you know what they mean by the highlighted section? Are they required to consult with BC?

## **Adastra Labs Clarifies and Retracts Certain Disclosure Related to its Receipt of Health Canada Approval for the Amendment to Include Cocaine Under its Controlled Substances Licence**

LANGLEY, BC, March 3, 2023 – <sup>Copyright</sup>

Copyright

For more information, visit: [www.adastraholdings.ca](http://www.adastraholdings.ca).

---

**From:** Sturtevant, Darryl MMHA:EX <[Darryl.Sturtevant@gov.bc.ca](mailto:Darryl.Sturtevant@gov.bc.ca)>  
**Sent:** Thursday, March 2, 2023 5:42 PM  
**To:** Massey, Christine MMHA:EX <[Christine.Massey@gov.bc.ca](mailto:Christine.Massey@gov.bc.ca)>; Holoiday, Leah GCPE:EX <[Leah.Holoiday@gov.bc.ca](mailto:Leah.Holoiday@gov.bc.ca)>  
**Cc:** Cruse, Cassandra MMHA:EX <[Cassandra.Cruse@gov.bc.ca](mailto:Cassandra.Cruse@gov.bc.ca)>; Butler, Ally MMHA:EX <[Ally.Butler@gov.bc.ca](mailto:Ally.Butler@gov.bc.ca)>  
**Subject:** FW: update: another dealers license announcement

Hi – Ken has flagged another announcement similar to the Astra Lab announcement that came up in QP today. I asked Ken to work with Pharmaceutical Division on an IBN (I should see a draft tomorrow) that will provide information on the various uses of cocaine in medical applications, etc. I have also asked them to provide any information they can compile on the number of such licenses there are in BC.

As Ken notes below, these pharmaceutical announcement are often also used to bolster stock prices. For Example, Astra's stock prices tripled since announcing their exemption from Health Canada.

Darryl

---

**From:** Tupper, Kenneth HLTH:EX <[Kenneth.Tupper@gov.bc.ca](mailto:Kenneth.Tupper@gov.bc.ca)>  
**Sent:** March 2, 2023 5:35 PM  
**To:** Sturtevant, Darryl MMHA:EX <[Darryl.Sturtevant@gov.bc.ca](mailto:Darryl.Sturtevant@gov.bc.ca)>  
**Subject:** update: another dealers license announcement

Hi Darryl – heads up, another “corporate update” from a BC company, [Sunshine Labs](https://www.newswire.ca/news-releases/sunshine-earth-labs-ltd-provides-corporate-update-849132157.html), proudly announcing their dealers licence for a variety of drugs, including coca leaf and cocaine: <https://www.newswire.ca/news-releases/sunshine-earth-labs-ltd-provides-corporate-update-849132157.html>

We're working on an IBN regarding this, but key thing to know is that dealers licenses are totally different from a Health Canada [Notice of Compliance](#) (or NOC), which is what is required for a pharma manufacturer to bring a drug to market in Canada. This is a much bigger hurdle, involving expensive human clinical trials and a lengthy Health Canada regulatory review process. These news releases are just marketing spin, likely to boost stock price.

Cheers  
Ken