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BETWEEN A ROCK AND A HARD PLACE: PRESCRIPTION OPIOID RESTRICTIONS IN THE TIME OF FENTANYL AND OTHER STREET DRUG ADULTERANTS

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21 <u>Abstract</u>

22 Nonmedical prescription opioid use (NMPOU) has increased alarmingly across 23 Canada and resulted in strict prescribing restrictions on opioids. Despite a clear need to 24 reduce opioid prescriptions in response to this crisis, few other policies have been 25 implemented and this singular focus is incongruent with the known characteristics of substance use disorders, negative effects of supply reduction policies, and realities of 26 27 pain management. Given the recent rise of Fentanyl and other dangerous adulterants in 28 street drugs, this commentary argues that a comprehensive response to NMPOU that 29 includes improvements to addiction management and harm-reduction services is 30 urgently needed.

31 MeSH keywords: Public health; pain; opioid-related disorder; harm reduction

32 <u>Text</u>

Nonmedical prescription opioid use (NMPOU) has created widespread public health problems across North America, as well as challenges for physicians and policymakers alike. Recommendations for addressing NMPOU have focused primarily on restricting opioid prescribing to reduce iatrogenic dependency, NMPOU incidence, and prescription opioid (PO) diversion;^{1, 2} however, broader policies to prevent and reduce the harms of NMPOU are lacking. Despite the clear need to reduce opioid prescribing, the singular focus of this response is incongruent with the known characteristics of

40	substance use disorders, negative effects of supply reduction policies, and realities of
41	pain management. While safe prescribing practices that reduce PO diversion and
42	NMPOU incidence should be promoted, the recent use of Fentanyl and other dangerous
43	adulterants, such as Carfentanyl, in street drugs heightens the need for a
44	comprehensive public health response that addresses substance use more widely.
45	Consequently, we argue that it is reasonable to foresee negative consequences such as
46	Fentanyl-related overdoses arising from constraining the supply of POs without also
47	addressing policy deficiencies related to managing substance use disorders and pain.
48	A long-standing body of scientific literature characterizes problematic substance
49	use as a chronic and relapsing neurobiological disorder ³ that is exacerbated by social
50	and economic deprivations. ⁴ Despite this knowledge, stigma and misconceptions of
51	addiction endure among some healthcare professionals which affects the quality of care

addiction endure among some healthcare professionals which affects the quality of care
for patients with substance use disorders.⁵ In addition, the evidence-practice gap has
resulted in morality-based law enforcement strategies that remain the predominant
response to substance use and repeatedly fail to achieve meaningful progress.

Although the failing "war on drugs" has consistently demonstrated that supply reduction policies often result in perverse unintended consequences that severely undermine public health and safety, the principles of supply reduction are being expanded to opioid prescribing in numerous jurisdictions in order to prevent the

59 initiation of NMPOU and diversion of POs. Given the powerful withdrawal symptoms and cravings associated with opioid use disorders, however, prescribing restrictions 60 may not have the intended effect among those who experience these symptoms and are 61 62 compelled to seek out relief. Individuals who cannot acquire POs due to limited availability or cannot use POs via their preferred route of administration due to abuse 63 64 deterrent formulations may resort to a substitute drug; indeed, research findings link 65 PO supply reduction measures in the United States with transitions from POs to street 66 drugs such as heroin among some at-risk groups.^{6,7} In an era of increasing adulteration 67 of street drugs with Fentanyl, related analogues, and new synthetic chemicals these 68 risks are particularly concerning.

69 Although POs are only effective for treating certain types of pain,⁸ the issue of 70 pain management is entwined with NMPOU given that those who engage in NMPOU 71 frequently report pain relief as a motivation for use.⁹ However, current prescribing 72 guidelines recommend non-pharmacological therapies for treating pain which many healthcare systems are not equipped to provide or require substantial out-of-pocket 73 expenses.⁸ In addition, research on the benefits of medical cannabis is lagging despite 74 75 the potential for medical cannabis to be substituted for PO use¹⁰ and decrease PO-76 related emergency room admissions.¹¹ Consequently, sanctioned pain treatment can be 77 very difficult to access, and this disproportionately affects at-risk groups such as older 78 adults and those who have low incomes. This paradox is consistent with the inverse

care law, where people who are most vulnerable and in need of healthcare services areless likely to receive adequate healthcare than the general population.

81 Considering the well-established characteristics of substance use disorders, 82 harms associated with supply reduction policies, and importance of effectively managing pain, the current policy focus on restricting POs is too narrow. In addition to 83 these restrictions that reduce NMPOU incidence and PO diversion, parallel efforts to 84 care for those already engaging in NMPOU are critical for avoiding the unintentional 85 86 consequences of decreasing the supply of POs and increasing risk of exposure to 87 adulterated street drugs. A comprehensive approach to NMPOU is needed that 88 addresses the realities of both the NMPOU epidemic and substance use disorders, and 89 introduces policy reforms that improve access to non-pharmacological pain treatments. 90 These broader policy solutions may include physician-specific policies and scaling-up 91 evidence-based harm reduction services.

To address NMPOU, physicians should use prescription drug monitoring databases and safe prescribing practices, such as urine drug screen tests and treatment agreements. Physicians who learn of patients engaging in NMPOU, however, should continue providing the best medical care for those patients instead of immediately discontinuing POs. Regimen noncompliance or NMPOU should trigger an intensification of services for these patients, which may include assistance tapering off

98 POs, and facilitating access to opioid agonist treatment and other harm reduction 99 services as appropriate. Heroin-assisted treatment programs are also feasible for 100 treating individuals who do not respond to traditional opioid agonist treatment 101 therapies and require higher treatment intensity.¹² In addition, emergency department 102 protocols for managing opioid withdrawal may provide an important entry point for 103 engaging patients who use POs nonmedically in care. Although innovative solutions 104 such as these are necessary for addressing NMPOU, novel programs or policies often 105 lack expansive evidence bases to guide implementation in new settings. There is 106 considerable evidence, however, affirming addiction as as chronic and relapsing 107 medical condition that requires long-term treatment¹³ and wraparound services.¹⁴

108 Efforts to reduce enduring barriers to opioid agonist treatment and expand other 109 programs with strong evidence bases, such as drug consumption rooms, drug testing 110 services, needle exchanges, and naloxone distribution, are also important. Despite numerous challenges to implement successfully,15 harm reduction strategies are 111 112 effective in many settings for helping people with substance use disorders maintain 113 engagement with healthcare services, reduce potential harms such as fatal overdoses, 114 and facilitate linkages to other services, including treatment. This approach has been 115 successful precisely because it addresses the realities of substance use disorders without 116 moralizing or stigma. Unfortunately, these programs are largely absent from 117 mainstream healthcare and remain chronically under-funded as services for a relatively

small and marginalized section of the population. The ubiquity of NMPOU and the rise of Fentanyl, however, expose the need to better integrate harm reduction services within healthcare systems, expand anti-poverty programs, reduce addiction-related stigma among healthcare professionals, and give serious consideration to decriminalizing or legalizing all illicit drugs.

123 It is clear that physicians who prescribe and do not prescribe POs are caught in 124 ethical dilemmas where they risk "doing harm" regardless of their decision. Despite a 125 clear need to reduce PO prescriptions, comparable attention to closing the evidence-126 practice gap and implementing a comprehensive response to NMPOU beyond supply-127 reducing efforts is important. Given the realities of substance use disorders and 128 emergence of Fentanyl and dangerous adulterants in street drugs, broader policy 129 solutions will reduce the risk of pushing vulnerable citizens further to the margins and 130 provide a meaningful response to this epidemic.

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