

21 **Abstract**

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
26 substance use disorders, negative effects of supply reduction policies, and realities of
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 **Text**

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

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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 disorder³ 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
52 for patients with substance use disorders.⁵ In addition, the evidence-practice gap has
53 resulted in morality-based law enforcement strategies that remain the predominant
54 response to substance use and repeatedly fail to achieve meaningful progress.

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

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59 initiation of NMPOU and diversion of POs. Given the powerful withdrawal symptoms
60 and cravings associated with opioid use disorders, however, prescribing restrictions
61 may not have the intended effect among those who experience these symptoms and are
62 compelled to seek out relief. Individuals who cannot acquire POs due to limited
63 availability or cannot use POs via their preferred route of administration due to abuse
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
73 healthcare systems are not equipped to provide or require substantial out-of-pocket
74 expenses.⁸ In addition, research on the benefits of medical cannabis is lagging despite
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

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79 care law, where people who are most vulnerable and in need of healthcare services are
80 less 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
83 managing pain, the current policy focus on restricting POs is too narrow. In addition to
84 these restrictions that reduce NMPOU incidence and PO diversion, parallel efforts to
85 care for those already engaging in NMPOU are critical for avoiding the unintentional
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.

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

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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 a 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
111 numerous challenges to implement successfully,¹⁵ harm reduction strategies are
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

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118 small and marginalized section of the population. The ubiquity of NMPOU and the rise
119 of Fentanyl, however, expose the need to better integrate harm reduction services
120 within healthcare systems, expand anti-poverty programs, reduce addiction-related
121 stigma among healthcare professionals, and give serious consideration to
122 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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