

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

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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;<sup>1,2</sup> 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

## Opioid prescriptions and Fentanyl

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<sup>3</sup> that is exacerbated by social  
50 and economic deprivations.<sup>4</sup> 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.<sup>5</sup> 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

## Opioid prescriptions and Fentanyl

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.<sup>6,7</sup> 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,<sup>8</sup> 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.<sup>9</sup> 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.<sup>8</sup> In addition, research on the benefits of medical cannabis is lagging despite  
75 the potential for medical cannabis to be substituted for PO use<sup>10</sup> and decrease PO-  
76 related emergency room admissions.<sup>11</sup> 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

## Opioid prescriptions and Fentanyl

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

## Opioid prescriptions and Fentanyl

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.<sup>12</sup> 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 treatment<sup>13</sup> and wraparound services.<sup>14</sup>

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,<sup>15</sup> 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

## Opioid prescriptions and Fentanyl

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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