Requirements for Chain of Signatures in Light of COVID-19

This bulletin replaces the bulletin dated March 20, 2020.

In response to the evolving health risk posed by the COVID-19 pandemic, the Office of Controlled Substances (OCS) is allowing temporary measures to reduce the likelihood of spreading COVID-19 between parties when taking delivery of narcotics, controlled drugs and restricted drugs while maintaining record keeping requirements.

Methods of transportation used by licensed dealers must allow for accurate records while their controlled substance is in transit. Furthermore, licensed dealers must keep accurate records of the signatures of anyone having custody of the substance until it is delivered to its final recipient. These measures are required to minimize the risk of diversion of controlled substances to illicit markets.

It is recommended to take the needed precautionary measures such as using a personal stylus or pen to sign for deliveries, wearing gloves, and disinfecting handheld devices and equipment before its use. The following may also be considered by licensed dealers to help reduce the risk of spreading COVID-19:

- The courier validates the identification of the consignee, such as the pharmacist; and
- The courier transcribes the name of the consignee in their records, such as a handheld device or paper documentation.
To fulfill the regulatory requirements for the chain of signatures, these documents must be kept for 2 years.

Couriers and pharmacies are also reminded to follow the direction of the Public Health Agency of Canada in regards to safety measures to help contain the spread of COVID-19, especially as information evolves on the viability of COVID-19 on containers, bins or cartons. The primary source of information on COVID-19 is canada.ca/coronavirus.

The measures above are effective as of March 20, 2020. As the duration of this pandemic is unknown at this time, these measures are set to expire on the earliest of the following dates:

- June 30, 2020;
- the date that they are replaced by new or additional measures; or
- the date upon which these measures are revoked.

If you have any questions, please contact Health Canada’s Office of Controlled Substances at hc.compliance-conformite.sc@canada.ca.