

August 24, 2007

Ms. Erin Kingdom  
Office of Controlled Substances  
Drug Strategy and Controlled Substances  
Health Environments and Consumer Safety Branch  
Health Canada  
Address Locator 3503D  
Ottawa, Ont K1A 1B9

Dear Ms. Kingdom,

The College of Midwives of Ontario is a member of the Canadian Midwifery Regulators Consortium (CMRC). We have participated on the development of the CMRC's participation in Health Canada's consultation on the *New Classes of Practitioners Regulations*.

We were disappointed to see that the Listed Substances for Midwives did not include fentanyl. Fentanyl is one of the most important analgesics used for labour pain in Canadian hospitals today. Current evidence indicates it is safer for the fetus/newborn than pethidine/meperidine (Demerol). Midwives will order and administer fentanyl to women in labour in the hospital, just as physicians do now, and not for any other indication. Fentanyl, like other narcotics, is subject to the standard narcotic control procedures such as being kept under lock and key in the hospital.

Further, because fentanyl is the preferred pain relief for labouring women, it will be difficult for midwives to access the other listed substances through the hospital supply systems, leaving midwives' clients with less acceptable pain relief options. We do not believe that this is an equitable approach.

We support the CMRC's proposed list of substances that were provided as a part of the Health Canada consultations on the development of the *New Classes of Practitioners Regulations*. We urge you to re-consider the list of substances published in the Canada Gazette on June 30, 2007 and to revise the list to reflect the proposal from the CMRC.

Thank you for your consideration of this issue.

Sincerely,

*Originally Signed*

Robin Kilpatrick  
Deputy Registrar