



B.C. Standards for Distributed Drug Checking Sites

Background:

- Drug checking can help save lives and reduce harms by empowering people who use drugs to make informed decisions—such as where, with whom, how much, or even whether to use—based on information about their drug sample’s composition.
- Drug checking services use established technologies such as antibody-based test strips, reagent tests, and chemical analytical instruments (e.g., Fourier transform infrared spectroscopy (FTIR), Raman spectroscopy, or mass spectrometry) for people who use drugs to have illicit drug samples analyzed to learn more about their chemical composition, including potential adulterants.
- An expansion of drug checking services in B.C. through distributed models of drug checking—whereby samples can be collected, stored and transported between collection points (Collection Sites) and receiving points (Testing Sites) for analysis—will assist in getting information for clients, service providers, and policy makers about the substances contributing to overdoses.
- In June 2021, Health Canada issued an amended subsection 56(1) class exemption to the *Controlled Drugs and Substances Act* (CDSA) to allow for the establishment of “urgent public health need sites” (UPHNS) for distributed models of drug checking or lab analysis, through legal collection, storage and transport of small samples of illicit drugs.
- To operationalize this exemption, the B.C. Ministry of Health is authorizing Medical Health Officers (MHOs) to enter into agreements with prospective UPHNS operators to create UPHNS for the purpose of enabling distributed models of drug checking and analysis – hereby referred to as “B.C. Distributed Drug Checking Sites” – on behalf of the Minister.
- B.C. Distributed Drug Checking Site agreements will be ratified through a designation letter from a Medical Health Officer to the person responsible for the site’s operations (designated person) after completion of an Application for a B.C. Distributed Drug Checking Site.
- The Application for a B.C. Distributed Drug Checking Site requests essential information about the B.C. Distributed Drug Checking Site (e.g., location name, designated person’s name, location address, type of drug checking, etc.) and requires the signature of the designated person to abide by the terms and conditions of the *B.C. Standards for Distributed Drug Checking Sites*. A copy (digital or hard copy) of both the form and the MHO’s letter will be retained by the B.C. Distributed Drug Checking Site, by the Health Authority/MHO’s office, and emailed from the Health Authority to the B.C. Ministry of Health.



Conditions for Authorizing B. C. Distributed Drug Checking Sites:

1. Compliance

- a. As per the Health Canada Class Exemption's terms and conditions, all UPHNS (Distributed Drug Checking Sites) are to maintain compliance with all applicable federal, provincial and municipal legislation; furthermore, all B.C. Distributed Drug Checking Sites are to adhere to the operational guidance outlined in this document.

2. Reporting and Record Keeping

- a. Following a UPHNS designation by a local Medical Health Officer, the following information must be provided to the B.C. Ministry of Health:
 - I. the name and address of the B.C. Distributed Drug Checking Site.
 - II. the name of the designated person responsible.
 - III. the type of drug checking services to be offered and the date upon which the service is initiated and closes, if applicable.
 - IV. Classification as a Collection Site, Testing Site, or both.
 - V. Confirmation that policies and procedures in alignment with *B.C. Standards for Distributed Drug Checking Sites* as outlined within this document are in place.
- b. Select aggregate drug checking data (e.g. # of samples tested, expected substance, drug check outcome) will be shared to enable a provincial drug checking surveillance network.

3. Policies and Procedures

- a. Collection
 - I. Information to be given to client at point of sample collection regarding confidentiality of personal information, sample size required, how testing results will be delivered, and destruction of sample.
- b. Packaging
 - I. Samples are to be packaged within a small sealable plastic bag within a sealable envelope (e.g., #10 business envelope). The packaging process should ensure that there is no risk of cross-contamination or alteration.
 - II. All envelopes in which samples are packaged must be labelled with the 15-digit sample ID code, as recorded in the B.C. Distributed Drug Checking Chain of Custody Log, to track the sample from collection to destruction.
 - III. A maximum of 10 individually labeled samples must be packaged in a larger manila or similar envelope (e.g. 9" x 12"). This manila envelope should be labeled with, at minimum: the date of packing (i.e., sealed for transportation readiness), receiving site location (i.e., "To: xxx"); sending site location (i.e., "From: yyy"); and the number of samples (up to 10) packaged within.
- c. Transportation
 - I. All transfer of illicit drug samples carried out by a B.C. Distributed Drug Checking Site are to be done by trained staff or trained volunteers of the site or by a bonded courier service.



- II. A copy of the UPHNS designation and the B.C. Distributed Drug Checking Chain of Custody Log must accompany the transfer of illicit drug samples (with one Custody Log form for every manila envelope).
- d. Security
- I. Samples for storage at a B.C. Distributed Drug Checking site are to be secured in a lock box or safe that only authorized staff have access to.
 - II. Any residual amount of a sample that is not stored for further transport and analysis is to be destroyed.
 - An example of an appropriate drug sample destruction pathway is to dissolve the sample in water and then deposit the solution into a container with gravel matrix (e.g., kitty litter), rendering the substance irretrievable. The gravel matrix is to be discarded into the garbage.
 - III. The B.C. Distributed Drug Checking Site must have a policy to address an ‘unidentified substance’ that may be an illegal substance that has been left behind by a client without consent for testing (e.g., dropped within the interior boundaries of the site). If the substance is not reclaimed, local law enforcement must be notified within 24 hours of the occurrence.
- e. Chain of Custody
- I. The B.C. Distributed Drug Checking Chain of Custody Log, provided by the B.C. Ministry of Health, is to follow a sample from collection to destruction and then be archived either digitally (photo, PDF, digital log, etc.) or hard copy for the duration of the designation.
- f. Staff Training
- I. All staff members and volunteers involved in a B.C. Distributed Drug Checking Site’s activities must be employed by or under a volunteer agreement with the site’s organization.
 - II. All staff members and volunteers must be informed and trained on their roles and responsibilities.
 - III. The B.C. Distributed Drug Checking Site is responsible for all training.
- g. Community Engagement
- I. The B.C. Distributed Drug Checking Site must maintain engagement with the community and other service providers that may be impacted by its operations. At a minimum, the B.C. Distributed Drug Checking Site should publicly post its location and provide a phone number and email address to respond to any questions or concerns from the community.
 - II. Any concerns raised through correspondence or community engagement should be documented and where appropriate, the B.C. Distributed Drug Checking Site should implement relevant mitigation strategies in response to concerns raised.