

**PRESCRIPTION DRUG EXPORTS TO THE UNITED STATES:
AN ANALYSIS OF THE ONLINE COMMUNICATION STRATEGIES OF
CANADIAN E-PHARMACIES**

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Abstract

This paper is concerned with the online communication strategies of Canadian e-pharmacies. The Canadian e-pharmacy industry is focused primarily on the export of prescription drugs to consumers in the United States. The industry has experienced rapid growth as a result of the reach, interactivity and transactional capabilities of the Internet. This paper examines the regulatory, legal, ethical and economic challenges faced by the industry. The paper also investigates how Canadian e-pharmacies use their corporate websites to communicate their legal obligations and value proposition to stakeholders. Using content analysis and optimal scaling techniques, the study finds that only a minority of firms in the industry score well on important communication dimensions.

Keywords: *e-pharmacies, communication strategies, Canada, United States, exports, prescription drugs.*

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INTRODUCTION

This paper examines the online communication strategies of Canadian Internet pharmacies. Canadian e-pharmacies focus primarily on the export of prescription drugs to consumers in the United States. The industry is relatively new and is reported to have had its origin in 2000 when a pharmacist based in western Canada recognized an arbitrage opportunity and began selling nicorette gum, a non-prescription anti-smoking medication, on eBay to U.S customers.^{1,2} Buoyed by strong U.S demand the pharmacist established a stand-alone website and broadened the product offering to include diabetes test strips, eventually introducing prescription drugs a year later, in 2001.

Since its inception the Canadian Internet pharmacy industry has grown to an estimated \$1 billion in sales with roughly 100 Canadian Internet pharmacies and 4,000 employees serving some 1 million U.S customers.^{3,4,5} The rapid growth of the Internet pharmacy industry has, however, ignited debate on both sides of the Canada-U.S border. A number of economic, regulatory, political and ethical forces are now aligned which militate against the industry's prospects for survival and growth. Concerns have been raised that the industry may relocate to Europe in order to escape the confluence of negative uncontrollable factors,

resulting in job losses and reduced investment in Canada.² The impact of these forces is reviewed fully in a subsequent section.

It is important to note that the academic literature has only just begun to focus on the role of the Internet in pharmaceutical marketing. Recent work has centered on the communication strategies of e-pharmacies and the ethical and privacy concerns involved in the exchange and use of information in online commercial transactions.^{6,7,8,9,10} The role of government in regulating the online sale of pharmaceutical drugs has also been examined.^{11, 12} In addition, a few studies have explored consumer attitudes towards online prescription drug sales and levels of service quality provided by e-pharmacies.^{13,14} Despite these important contributions, research on the use of the Internet in the marketing of pharmaceutical drugs remains relatively undeveloped.

This paper is concerned with Canada-U.S trade in prescription drugs and the communication strategies of Canadian e-pharmacies. It is important to recognize that U.S. citizens in border states have purchased prescription drugs in Canada for many years prior to the emergence of e-pharmacies. These sales were motivated by significant differences in prices in the two countries. The unprecedented reach and interactivity of the Internet has, however, made information on these price differences more readily available to consumers across the U.S and made geographic distance irrelevant to the transaction

process. The Canadian Internet pharmacy industry grew out of the need to service this large but geographically dispersed customer base.

Despite the importance of information acquisition and dissemination to the growth and future development of this industry, little work has been done to evaluate the website communication strategies of Canadian e-pharmacies. There are several research questions. Do Canadian Internet pharmacies effectively communicate their legal obligations in the marketing of prescription medicines? Do Canadian e-pharmacies use website communication to effectively engender client trust and confidence in the industry? Do Canadian Internet pharmacies use online communication to foster confidence in the integrity of their commercial transactions? These issues are central to the long-term viability of the Internet pharmacy industry, irrespective of jurisdiction of operation, but have largely been overlooked in the academic literature. This paper will attempt to partially fill this void.

Research Objectives:

This study seeks to achieve two major research objectives:

- (1) to review the economic, political, regulatory and ethical challenges facing the Canadian Internet pharmacy industry.

- (2) To determine the extent to which Canadian e-Pharmacies use their corporate websites to communicate their legal obligations and value proposition to stakeholders.

Organization of the Paper:

The present paper is organized into six major sections. Following the Introduction is presented a discussion of Canada-U.S trade in prescription drugs and the role of Canadian Internet pharmacies. This section also provides an analysis of the challenges facing this fledgling industry and the economic, political, regulatory and ethical forces which conspire against its development. The third section of the paper is devoted to the study's research methodology and data sources. The study's empirical results are presented in the fourth section while the fifth provides a discussion of the findings. The sixth section summarizes the discussion.

INTERNET SALES OF PRESCRIPTION DRUGS

As noted above exports of prescription drugs to the United States from Internet pharmacies based in Canada has grown significantly since the industry's inception. The business model used by firms in the industry is relatively simple (Figure I). A consumer browses the database of products offered by a Canadian e-pharmacy and places an order. The consumer is asked to provide a

prescription which is delivered to the e-pharmacy via fax or mail. This is a legal requirement. It should be noted that there are online pharmacies which do not require a prescription, but instead rely on a self-reported medical history from the prospective customer. Once received, all documentation is forwarded to a Canadian-licensed doctor who reviews the information and writes a Canadian prescription for the drug. This step is required given that Canadian pharmacies are not legally authorized to fill prescriptions written by U.S. physicians. These doctors are paid for their services by the Canadian e-pharmacies. The e-pharmacy is now able to fill the prescription and ship the medication to the U.S patient by mail or courier. Drugs supplied by Canadian e-Pharmacies are sourced from traditional intermediaries, i.e. Canadian drug wholesalers, which are in turn supplied by the large multinational pharmaceutical companies.

Canadian Internet sales of prescription drugs to the US have been driven by a number of factors. The first is price. The regulatory environment in Canada is significantly different from that in the United States, with federal and provincial governments influencing drug prices. At the federal level the Patented Medicine Prices Review Board (PMPRB) monitors prescription drug prices with a view to ensuring that they are not excessive. Also, individual provinces maintain a list of prescription drugs that are eligible for reimbursement under provincial health programs. Drug companies have a clear pecuniary interest in ensuring that their prices are competitive or risk being excluded from the formulary.^{15, 1}

As a result of the government interventions alluded to above there is a significant price difference between prescription drugs sold in Canada and the United States. In fact, prescription drug prices are reported to be almost 70% higher in the U.S than in Canada.¹ This creates a natural arbitrage opportunity. It is important to recognize that these potential savings are particularly attractive to U.S seniors and immigrants as these segments of the market tend to be under-represented among Americans with health insurance. At present American seniors account for 90% of Canadian e-pharmacy sales.¹

As noted earlier Americans have been purchasing prescription drugs in Canada for many years with reports of organized shopping trips by seniors being well documented. For the most part, however, regular cross border purchases were only feasible for U.S citizens living close to the Canadian border. The Internet has, however, removed this location disadvantage allowing citizens across the U.S. to purchase prescription drugs wherever they reside. The Internet provides Canadian pharmacies with an effective communication channel to reach target segments of the U.S. market.

Growth in Canadian online exports of prescription drugs to the US has also been fostered by lax regulatory oversight in the U.S. While a significant percentage of the medications sold online to American consumers were manufactured in the U.S, their re-importation is illegal unless undertaken by the manufacturer.¹⁶ The Food and Drug Administration (FDA) has, however, not

been aggressive in enforcing the law when imports are in small quantities for personal use. Less than 1% of Canadian Internet pharmacy packages have been stopped at the U.S border.¹ The FDA admits that it is difficult for its inspectors to physically inspect the large volume of drug parcels entering the U.S. Physical inspection also has its limitations as a drug's appearance and labeling may not be sufficient to determine its identify and risk profile. According to the FDA, a significant number of cases are simply not reviewed and eventually Customs officials have little choice but to release the parcels to the addressees, although it is not known whether the contents violate the Food Drugs and Cosmetics Act.¹⁶

It should be noted that the FDA does have a personal importation policy which allows its field personnel latitude in admitting unapproved prescription drugs. Drugs intended for the treatment of a serious medical condition for which effective alternatives are not available in the U.S, may be admitted on humanitarian grounds.¹⁶ The importer is required to state in writing that the drug is for personal use and must provide the name and address of the U.S licensed physician responsible for the individual's treatment. The FDA notes that this guidance was issued to its field staff in response to concerns that potentially effective treatments for AIDS were available in some foreign countries but were not yet approved in the U.S.

Industry Challenges:

The Canadian Internet pharmacy industry currently faces a number of challenges (Figure 2). The practice of Internet pharmacy has attracted the attention of provincial colleges of physicians which have questioned the ethics of Canadian physicians endorsing or writing prescriptions for American patients they have not personally examined. Canadian regulations in this area are, however, not consistent and the practice is permitted in the provinces of Alberta, British Columbia and Manitoba. In other provinces, e.g. Ontario, the practice is illegal. The federal health ministry views the practice as unethical and the Canadian Medical Association and the Manitoba Pharmaceutical Association are both strongly opposed.¹⁷

It is interesting to note that in several U.S states such as Wisconsin, Missouri and Washington the official response to Canadian Internet pharmacies has been positive.⁴ These states have, in fact, encouraged their citizens to patronize Canadian e-pharmacies in an effort to counteract rising healthcare costs. While the Bush administration has promised to add prescription drug coverage to the federal Medicare program, Medicaid continues to face financial difficulties in several states.^{4,1} The pressure to reduce healthcare costs is significant.

The multinational pharmaceutical companies have also taken a position on Canadian e-pharmacy sales to the United States. As noted earlier most of the prescription drugs sold by Canadian Internet pharmacies are in fact manufactured in the U.S and sourced through traditional drug wholesalers which service bricks and mortar pharmacies. These drugs were not intended to be re-imported into the United States, and particularly not at significantly lower prices. As a result several major pharmaceutical companies have taken action to halt the parallel distribution of their brands arguing that the practice is illegal and potentially unsafe.

Interestingly, a U.S General Accounting Office (GAO) report found few problems associated with the handling and authenticity of FDA-approved drugs sourced from Canadian Internet pharmacies.¹⁸ In the case of drugs received from other foreign countries significant problems were observed including improper packaging and labeling, as well as a limited number of cases in which the international e-pharmacy shipped a counterfeit version of the drug ordered. While all drugs received from Canadian e-pharmacies were properly labeled and conformed to the chemical composition of the medication ordered, the GAO report notes that most of these were unapproved for the U.S market.

The drug companies have launched public relations campaigns to raise consumer awareness of the potential problems associated with purchasing drugs online. Efforts have also been made to tighten distribution by requiring Canadian

pharmacies to order directly from the manufacturer, with orders being reduced if quantities are viewed as excessive. These initiatives have been applauded in some quarters as concerns have been raised about counterfeiting and possible drug shortages in Canada as a result of online sales to the U.S.^{2, 5} The Canadian e-pharmacy industry has also expressed concerns that the major multinational pharmaceutical companies have been actively lobbying the Canadian federal government to impose a ban on exports of prescription drugs to the United States..

Some analysts have also questioned the sustainability of the prescription drug price differences between Canada and the U.S. Prescription drug prices in Canada have been rising and the margins of e-pharmacy operators are being squeezed. The increase in Canadian drug prices is a natural consequence of the supply interference strategies of the major pharmaceutical companies. Internet pharmacies are now being forced to source supplies from bricks and mortar pharmacies in order to service their U.S customers.¹⁹ These supplies are significantly more expensive than product purchased from wholesalers and is steadily eroding the margins of Canadian e-pharmacy operators.

Given the pressures from the U.S pharmaceutical companies and regulators, several Canadian e-pharmacies have already taken preemptive action and opened operations abroad, especially in the U.K.² The relocation of Canadian e-pharmacies could result in significant economic losses for provinces

such as Manitoba. Also, key U.S states such as Wisconsin have already lined up online pharmacies in the U.K and Ireland to provide prescription drugs to its citizens.¹⁷

RESEARCH METHODOLOGY

In this section of the paper is described the study's research methodology. In order to evaluate the communication strategies of Canadian e-pharmacies (objective #2) a content analysis of their corporate websites was conducted. Content analysis is an observational research method used to evaluate various forms of communication.^{20, 21} Based on a review of the secondary literature a content analysis form was developed which listed some 26 items viewed as important to the communication strategies of Canadian Internet pharmacies.

Items relate to areas such as: the communication of required legal and regulatory information; the communication of information to engender trust in the commercial transaction and the communication of information designed to engender trust in the industry as a whole. For example, websites were evaluated for explicit statements that a prescription must be provided by prospective customers. This is a legal requirement. Sites were also evaluated for explicit statements on how the firm secured the integrity of the medical and financial information provided by patients. While not a legal requirement such information would certainly provide some comfort to prospective customers concerned with

the integrity of the transaction. Also included on the content analysis form were questions regarding the presence or absence of references to the Canadian International Pharmacy Association (CIPA). CIPA is an advocacy group for the industry.

The Canadian Internet Pharmacy Directory (CIPD) located online at: <http://www.canadianonlinepharmacydirectory.com/list.asp?cmd=reset> is a fully searchable and comprehensive database of Canadian e-pharmacies. This directory was used to identify the firms to be analyzed. The list of some 127 firms in the CIPD database was screened to ensure that all URLs were active and the firms were still in business. Some firms in the database were identified as U.S. operations and these were automatically excluded. Duplicate listings were also removed. The result was a final list of 81 Canadian Internet pharmacies. These firms' websites were subjected to content analysis.

The content analysis was completed by two research assistants trained by the principal investigators, but working independently of each other. Each research assistant reviewed roughly 40 sites. The content analysis was completed over a two week period in January, 2005, with each website requiring an average of 15 minutes to completely evaluate. For each website visited the research assistants were required to record the presence or absence of each communication item listed on the form. A number of websites were randomly selected by the principal researchers and independently evaluated in order to

verify the accuracy of the research assistants' recorded observation. The data collected were analyzed using optimal scaling procedures in SPSS.

Optimal scaling is one of a number of data reduction techniques which seeks to represent the relationship between variables in as few dimensions as possible. Rather than parameter estimates, optimal scaling techniques rely on visual representation of the relationship between variables. The technique produces a solution in which objects within the same category are plotted close to each other while objects which are not in the same category are plotted at some distance from each other. The dimensions created by the analysis are essentially numerical scales representing artificial variables constructed from the data. The dimensions provide maximum explanation of the similarities and differences in the data. Firms with similar profiles on the dimensions formed will be clustered close together while other firms will be spatially separated.

EMPIRICAL RESULTS

In this section of the paper are presented the study's empirical results. As noted above optimal scaling is used to better understand the relationships in the data generated from the content analysis. Table 1 shows the discrimination measures for the two-dimension solution. Given that all firms analyzed were found to state that a prescription is required this variable was excluded from the analysis as it would not differentiate between the company websites. The results

are interesting. Based on the magnitude of their discrimination measures the following variables are observed to be important to the first dimension:

- Information on the qualifications of the doctor
- Statement that the company would not ship controlled substances to the U.S.
- Information on the e-pharmacy industry in Canada
- Statement that the e-pharmacy is licensed
- Information on U.S drug importation regulations
- Information on price comparisons with traditional bricks and mortar pharmacies.

On the second dimension the following variables were observed to be important:

- Information on the security of patient medical information
- Information on the security of patient financial information.

- Existence of a privacy statement on the company's website.
- Information on Canadian export regulations.

Dimension 1 clearly relates to information geared to communicating the integrity of the firms in the industry, their willingness to abide by government regulations and to follow the rules while providing U.S consumers with a cost effective solution. Dimension 2 largely captures information on the security of patient information received by the e-pharmacy as part of a commercial transaction.

The two dimensions described above are important aspects of the communication strategy of firms in the Canadian e-pharmacy industry. The analysis also indicates, however, that very few firms in the industry score well on both dimensions. Figure 3 provides a plot of the object scores generated by the optimal scaling procedure. Most firms in the industry are clustered to the left and bottom regions of the graph indicating weakness in their communication strategy on one or both dimensions. These firms do not score well in terms of providing information on the integrity of the industry and their willingness to comply with government regulations. They also do not score well in terms of providing prospective customers with assurances that their medical and financial data will be secure. There are only 16 firms that score well on both dimensions, i.e. 20% of the industry.

The analysis above has confirmed the overall weakness in the communication strategies of Canadian e-pharmacies. Some aspects of this communication failure are particularly revealing. For example, frequency analysis of individual communication items reveals that only 12% of websites evaluated provided information on the country of origin of the products they retailed. This is of concern given the proliferation of counterfeit prescription drugs that enter the U.S every year and the concerns of regulators in that country. Also interesting is the finding that only 38% of firms provided any information on their websites related to the safety and efficacy of the drugs they market and less than 30% of websites evaluated provided any links to independent medical research.

DISCUSSION

Based on a content analysis of Canadian e-pharmacy websites it was found that very few companies in the industry had well-developed communication strategies that feature information that engendered trust in the industry and dedication in protecting patient information. With relatively few exceptions firms have not paid sufficient attention to communicating their value proposition to stakeholders. Corporate websites are not being used to effectively build the image of the industry or inspire trust and confidence in their business processes.

The e-pharmacy industry has, however, grown rapidly despite the informational weaknesses identified in this study. Clearly, consumers value the cost savings provided by the Canada-US price differential, more highly than their informational needs. The lack of information on the country of origin of the drugs and their safety and efficacy, has done little to dampen the demand of U.S consumers. U.S consumers are also not relying on Canadian e-pharmacies to provide them with links to timely and objective medical research.

The industry is, of course, in the early stages of development and this may have some bearing on the current weaknesses in using corporate websites to communicate with stakeholders. These communication weaknesses, however, do create risks for consumers. As noted above, while all the websites evaluated clearly stated the need for a prescription several other aspects of communication needed to be improved. The onus is clearly on the consumer to solicit the necessary information from their doctor or other sources. A case can be made for the creation of minimum standards for information provided by e-pharmacies.

CONCLUSIONS

This paper has attempted to address the following research objectives:

- (1) to review the economic, political, regulatory and ethical challenges facing the Canadian Internet pharmacy industry.
- (2) To determine the extent to which Canadian e-Pharmacies use their corporate websites to communicate their legal obligations and value proposition to stakeholders.

The paper has made the point that despite explosive growth the Canadian e-pharmacy industry is at a cross-road. External forces have conspired to complicate the operating environment for firms in the industry and that these uncontrollable variables will necessitate adjustment. Despite the importance of information acquisition and dissemination to the strategy of firms in this industry the analysis has revealed severe weaknesses.

Figure 1: Business Model

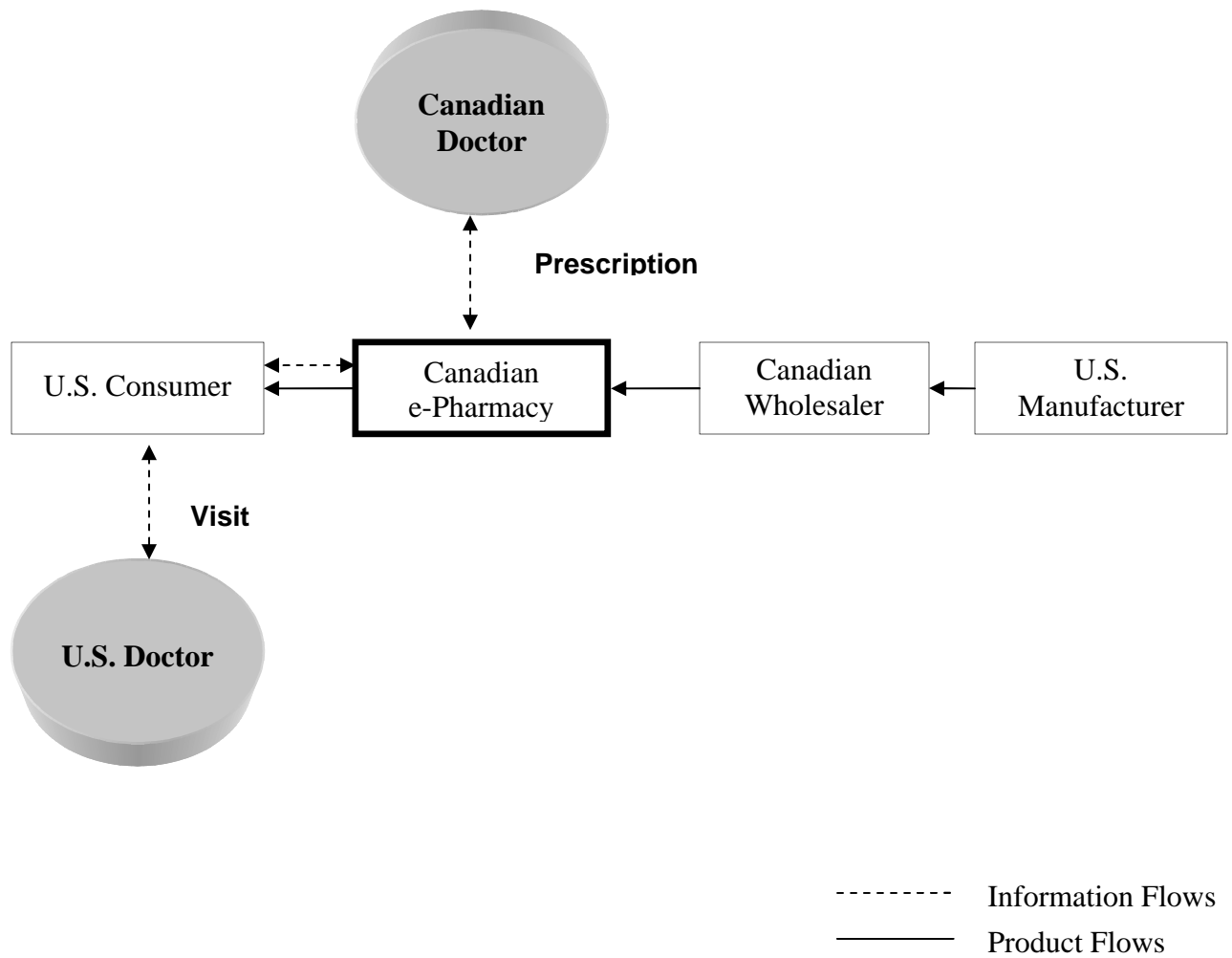


Figure 2: External Forces

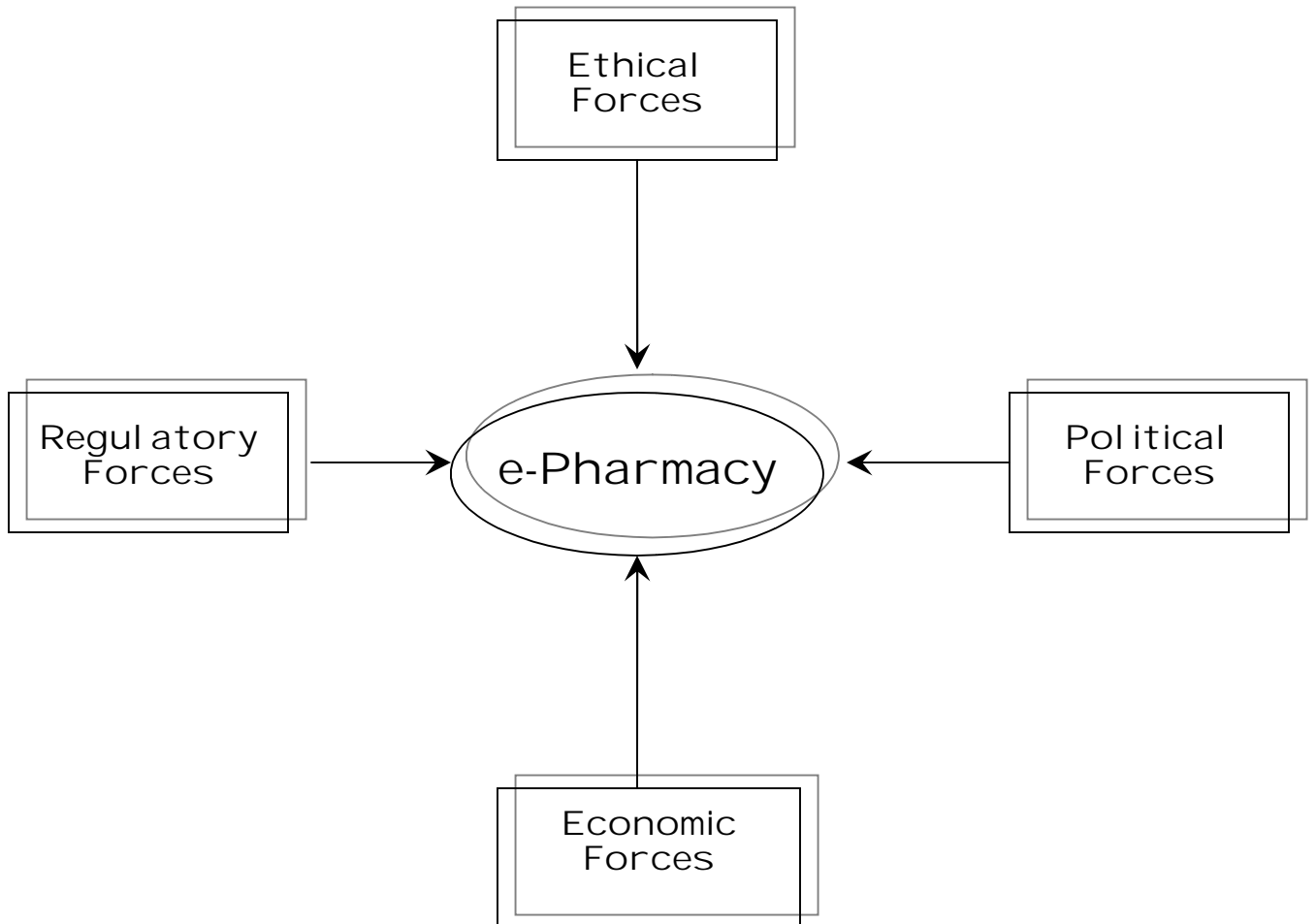
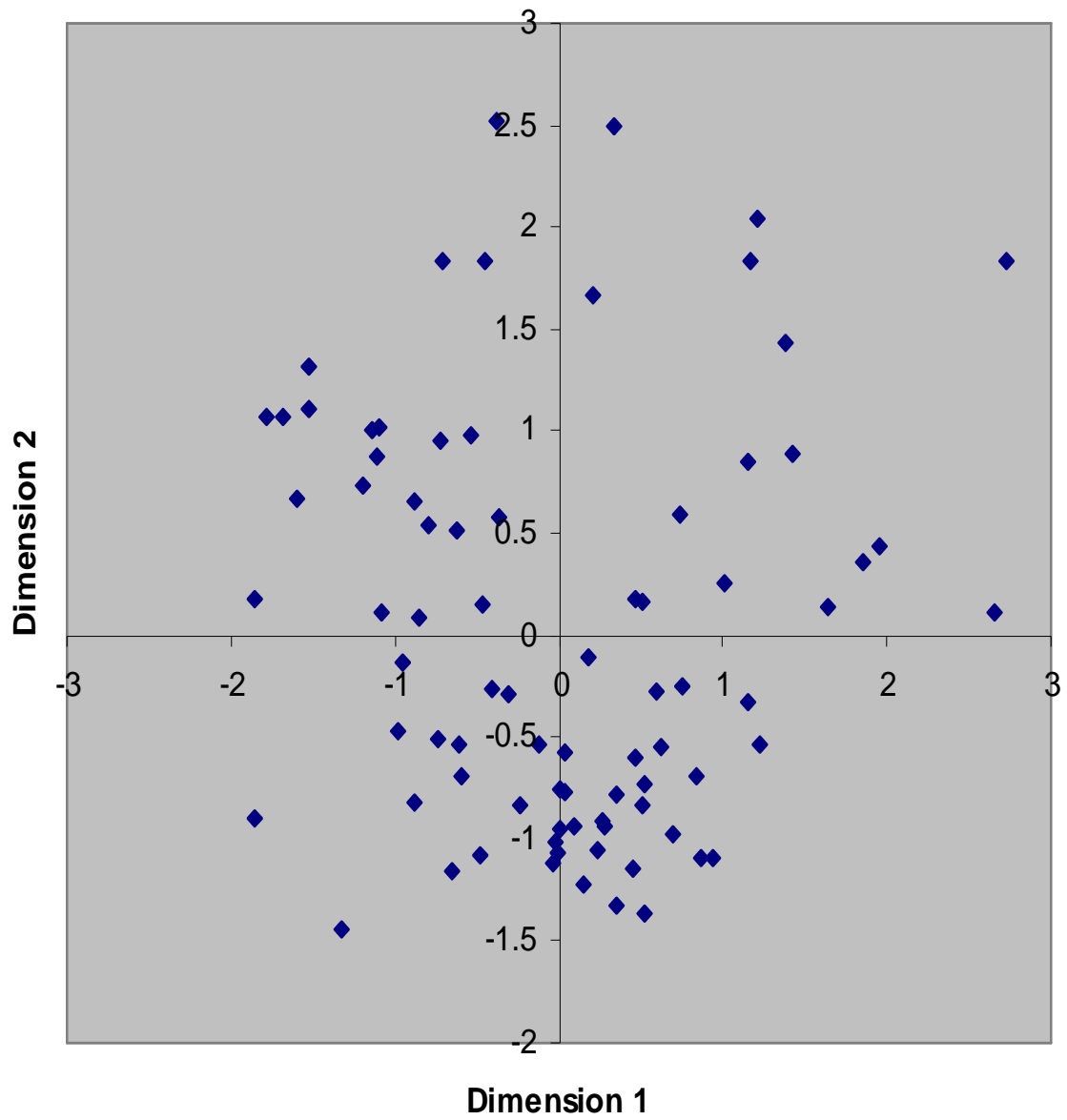


Table 1 Discrimination Measures

Question	Dimension 1	Dimension 2
1. Does the website provide information on the country of origin of the prescription drugs sold?	0.079	0.121
2. Does the website explicitly state that a prescription is required?	-	-
3. Does the website contain any information on the qualifications of the pharmacists filling the order?	0.170	0.000
4. Does the website contain any information on the qualifications of the doctors involved in filling the order?	0.261	0.004
5. Does the website contain information on how patient medical information is secured?	0.235	0.407
6. Does the website contain information on how patient financial information is secured?	0.171	0.500
7. Is there a privacy statement?	0.300	0.418
8. Does the website explicitly state that it will not ship to the United States drugs the FDA classifies as controlled substances?	0.191	0.064
9. Does the website provide a physical address for the company?	0.106	0.016
10. Does the website provide the company's telephone number?	0.105	0.036
11. Does the website state that a medical history is required?	0.064	0.020
12. Does the website provide information on the e-Pharmacy industry?	0.247	0.036
13. Does the website explicitly state that patients may be required to undergo a physical examination by their doctor?	0.057	0.037
14. Does the website state that the e-Pharmacy is licensed?	0.191	0.000
15. Does the website state that the e-Pharmacy fills prescriptions through a licensed brick and mortar pharmacy?	0.125	0.006
16. Does the website provide information on the safety and efficacy of the drugs it sells?	0.102	0.002
17. Is there a shipping policy?	0.172	0.111
18. Does the website explicitly state that additional fees (ordering fees; account set-up fees; medical fees and shipping charges) will be added to drug prices?	0.070	0.005
19. Does the website mention the Canadian International Pharmacy Association (CIPA)?	0.182	0.010
20. Does the website mention the National Association of Pharmacy Regulatory Authorities (NAPRA)?	0.003	0.023
21. Does the website provide information on US drug importation regulations?	0.222	0.143
22. Does the website provide information on Canadian drug export regulations?	0.305	0.370
23. Does the website provide links to independent medical research?	0.183	0.048
24. Does the website compare its prices with bricks and mortar pharmacies?	0.304	0.087
25. Does the website compare its prices with other e-Pharmacies?	0.035	0.156
26. Does the website provide content in Spanish or Portuguese?	0.153	0.142

Figure 3 Object Scores



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