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Written Submission for the Pre-Budget Consultation in Advance of the Upcoming Federal Budget

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Recommendations

Recommendation 1: That the government support the expansion of community pharmacy's role in public health immunizations to facilitate equitable access to publicly funded vaccines through all channels including pharmacy.

Recommendation 2: That the government promote policies that lead to improved access to medicines through a more robust, sustainable pharmaceutical supply chain.

Introduction

The rise and spread of the COVID-19 virus have exposed global weaknesses in healthcare systems and emergency preparedness. From early detection to adequate emergency stockpiles of supplies, Canada, like almost every other nation was unaware of what was needed to protect our citizens, treat those who contracted the virus, and to protect our most vulnerable. Through the challenges faced from 2019 to today, many components of our healthcare system have remained at the ready to treat and care for Canadians, and one remains under-utilized, our pharmacies.

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) represents Canada's leading pharmacy organizations, including chain, banner, long-term care, specialty pharmacies, grocery chains, and mass merchandisers with pharmacies. We advocate for pharmacies' role in caring for Canadians, both behind and in front of the counter. We aim to advance healthcare for Canadians by leveraging close to 11,000 pharmacies conveniently located in virtually every community throughout the country as integral points of patient care. We are typically open extended hours and offer primary care with convenience and superior accessibility. As designated Essential Services, pharmacies are crucial links in the primary healthcare system, providing critical, uninterrupted care in a coordinated way with other healthcare providers.

Pharmacies ensure efficient, effective continuity of care close to home while alleviating pressures on other primary care services. Canadians see their pharmacist up to ten times more frequently than any other healthcare provider. Even though they represent the third largest group of healthcare providers in Canada (after nurses and physicians), pharmacists are an underutilized resource in the healthcare system. Pharmacists consistently rank among the most trusted healthcare providers and are critical for patients' health and wellness needs. Ninety-three per cent of Canadians have a positive impression of pharmacists, believing they are an essential part of healthcare. Pharmacist interventions correlate with increased vaccination rates, better health outcomes, and improved return on investment for every dollar spent. Most recently, following much planning, pharmacies emerged as the most reliable and stable hub for vaccine delivery and continue to be the best choice for distribution. The established relationships and reputations within communities provide reliability and trust that mobile clinics or mass vaccination sites lack.

As we navigate the steady stream of challenges posed by this pandemic, we are proud of our members. They have risen to meet the challenges and have stepped up as an integral level of support and frontline care in communities throughout Canada. We want to highlight that our sector and organization stand ready to support the government as you chart the future of healthcare and how it will be delivered to support a safe economic restart.

Opportunities for unlocking additional public health capacity post-pandemic

Recommendation 1: That the government support the expansion of community pharmacy's role in public health immunizations to facilitate equitable access to publicly funded vaccines through all channels including pharmacy.

One of pharmacy's core strengths has always been our accessibility. With over 35,000 pharmacy professionals working in Canada's 11,000 community pharmacies, which are accessible by 95 per cent of Canadians who in fact live within five kilometers of a community pharmacy, our sector is poised to continue stepping up beyond the pandemic.

We have seen pharmacies to offer critical support in the areas of testing and vaccine distribution and know that we are just scratching the surface of unlocked potential. The successful, safe and expedient distribution of COVID-19 vaccines through neighbourhood pharmacies confirms that Canadians can rely on and trust them to tackle more front-line care.

As a partner in delivering healthcare solutions, government can trust pharmacies and the efficient pharmaceutical distribution system to facilitate the storage, distribution, dispensing, and administration of vaccines. Furthermore, allowing pharmacies to serve as vaccine and immunization hubs will prioritize service delivery and efficient healthcare for Canadians. Nearly 90 per cent of Canada's 11,000 pharmacies routinely administer immunizations with trained staff, physical/digital infrastructure, and refrigerator storage capacity. Due to the sheer volume of pharmacies in Canada and their geographic locations, pharmacies are a logical centralized location for vaccines and immunizations.

We know that when vaccines are available at their community pharmacy, people can conveniently access them and – because of this accessibility – they may be more likely to get vaccinated. Recent rounds of public polling suggest that 80% of Canadians trust their pharmacist to administer vaccines and 87% would be comfortable receiving their routine vaccines at a pharmacy. Canadians value the flexible timing and convenient locations offered by vaccine administration at pharmacies, and 85% of Canadians are likely to consent to receiving immediately at a pharmacy if it was offered by a pharmacy team member. The trained healthcare practitioners, the physical abilities to store and administer vaccines and immunizations paved the way for pharmacies to successfully administer a record 5.6 million flu shots to Canadians last year (during the height of the COVID-19 pandemic), and pharmacies have administered up to 40% of COVID-19 vaccinations in some jurisdictions, thus reducing the rate of illness and strain on an already overwhelmed health care system.

We know that our focus on COVID-19 in the recent past has led to other unintended consequences in routine care, including delayed and missed child and adult routine immunizations. Health system partners will need to work hard and work together to help fill these gaps and catch up on delayed vaccinations to ensure Canadians are protected against other potential public health risks. Pharmacies in most jurisdictions already have the scope to administer other public health vaccinations, however, in many cases public supply of vaccines is not readily available through community pharmacies. This is creating an inequity in access to these vaccines based on where a patient chooses to receive their vaccine. We are a strong and logical partner to offer convenient, person-centric care that is geographically close to home.

COVID-19 has given us the opportunity to demonstrate and bring attention to our accessibility like never through our enduring local response to the pandemic. However, the government must ensure equitable access to publicly funded vaccines for both individuals and to pharmacies to truly initiate the top tier service our members can deliver.

Fighting the Opioid Crisis

Pharmacists are also on the frontlines fighting the opioid crisis. Expanding pharmacists' role in managing opioid therapy, initiating opioid dependence therapy, and naloxone administration further enables pharmacists to offer solutions to this devastating public health crisis.

Recommendation 2: That the government promote policies that lead to improved access to medicines through a more robust, sustainable pharmaceutical supply chain.

Access to Medicines

Known globally for having a strong and accessible healthcare system, it is imperative that we continue to help it evolve and respond to the growing needs of the day. Our top priority has, and always will be, maintaining and continually improving access to prescription medications for all Canadians. We want to be a part of the solution that ensures no Canadian will go without the prescription medication they need. Canada's priority should be on helping those who don't have coverage and those with insufficient

coverage, without disrupting the majority of Canadians who have drug coverage, especially during a global pandemic.

Canada's pharmacies serve millions of patients across the country, and the sector has a deep understanding of the current landscape of public and private programs for drug coverage, including its gaps. While complex, the current system works well and is reliable. Among the 86 per cent who report having coverage, 80 per cent are satisfied with their current primary plan, according to a recent survey conducted by Pollara Strategic Insights in November 2020. On the other hand, 72 per cent are concerned about the potential impact of national pharmacare on their current coverage. Furthermore, while 82 per cent of Canadians are generally supportive of the concept of national pharmacare, the level of support drops to just 25 per cent when the model is a program that would replace all existing government and private plans.

Neighbourhood Pharmacies supports a strategy for high-cost drugs for rare diseases that ensures every patient confronting a rare disease has equitable access to potentially life-saving treatment through a drug program regardless how they are paid for or where they live across our country. Canada should consider a holistic approach to patient access to treatment that includes drug availability, distribution, coverage and patient support services.

There must be collaborative work between federal, provincial, and territorial departments to close gaps in coverage while ensuring continuity of coverage for those who already possess it. The federal government can show leadership by establishing guiding principles for the provinces and territories. As the front-line distributors of medications, pharmacies can play an integral role in expanding the accessibility of pharmacare for all.

Drug Pricing

Canadians deserve to pay a fair and reasonable price for their prescription drugs. However, reductions in drug prices have the unintended impact of reducing the funding for the professional pharmacy services that Canadians rely upon to ensure the timely access, safety, appropriateness and effectiveness of their therapies. Systemic reductions in drug prices caused by government policy should always include consultation with pharmacy to avoid unintended impacts to patient care.

Pharmacies serving complex patients with specialty medications are the most impacted by reductions in drug prices. Patients who need specialty medications rely on pharmacy services to reach the best possible health outcomes. The healthcare system also depends on the services pharmacies provide to achieve the best value for money spent on pharmaceuticals. Government policy leading to price reductions of specialty medications should always include an evaluation of the impact to patients and pharmacies.

The guidelines finalized by the PMPRB to implement Patented Medicines Regulation changes carry inadvertent but serious consequences for pharmacy operators that compromise their ability to provide critical patient support services. Most importantly, patient services that support the administration of expensive medicines for complex conditions and the services provided by pharmaceutical distributors is based on a cost-plus model that is a function of drug prices. Funding for these services are based almost exclusively on a percentage of the drug price and thus will also be reduced as a direct result of price reductions the medications provided for by the Guidelines.

It is concerning that current plans for the implementation of Patented Medicines Regulation changes do not allow sufficient time for manufacturers, provinces, and pharmacy to create a new framework for serving these patients. The economic impact of the most recent regulatory reforms on drug distribution and front-line delivery network needs exploration.

It is critical that the PMPRB's Monitoring and Evaluation Plan for updated Guidelines these findings, which will allow for a full assessment of the impact of the Guidelines on pharmacy services and inform

provinces, territories, pharmacy and manufacturers determine how to maintain reimbursement for patient services.

Drug Shortage Mitigation

Canada's pharmaceutical supply system is designed and carefully managed to serve our population of approximately 36 million people. We encourage Health Canada to maintain a vigilant eye on the drug supply and take the necessary measures to prevent drug shortages.

Drug shortages are a concern that became a lived experience for many at the beginning of the COVID-19 pandemic. Access to medication became limited, causing pharmacies to have to play a critical role of managing supply to ensure all Canadians continued to have access to the medicines they need. Throughout the pandemic, specifically related to drug distribution and mitigating potential shortages, pharmacies remained vigilant, reliable and trusted. The stability offered by our pharmacies, who remained open through the entire pandemic, is integral to ensuring Canadian's access to front line health care services.

Distribution of medical cannabis

Knowing that the federal government will soon re-open and evaluate current cannabis legislation, we ask that an amendment to Cannabis Regulations for pharmacists and pharmacies to be added to list of authorized dispensers and distributors for medical cannabis – just like hospitals and physicians are authorized to do. As the healthcare provider closest to where patients live and work, pharmacists are ideally located to support and counsel patients on the safe, effective use of medical cannabis.

The counseling and advice provided by pharmacists should be recognized for the clinical value it brings to patients and should be funded appropriately. The scheduling of Cannabis Health Products (CHPs) should follow the established national drug scheduling model developed by the National Association of Pharmacy Regulatory Authorities (NAPRA). Regardless of whether a CHP is classified as a prescription, non-prescription, or natural health product, pharmacists have an important role in providing clinical information to patients at the point of sale. Access to recreational cannabis should *not* be more liberal than access to cannabidiol (CBD)-containing cannabis products that can improve a patient's health. The decision to place CBD on the prescription drug list introduces unintended consequences for patients seeking the benefits of CBD.

Conclusion

COVID-19 has taught all an important lesson in reality; our healthcare system, while strong and capable, is very able to be overwhelmed. Our front-line healthcare workers need to be able to rely on all facets of the health care system to decentralized care and alleviate all pressure on the system possible. Pharmacies are the first and often most frequent point of contact patients have with the healthcare system. Pharmacists are on the frontlines. They deliver critical services, including medication therapies, disease management and innovative solutions in communities spanning urban, rural, and remote Canada. More can be done to leverage the role of trusted, accessible, clinically educated pharmacists to alleviate backlogs and create capacity in primary care.