



**Neighbourhood
Pharmacy**
Association of Canada

Association canadienne
**des pharmacies
de quartier**

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RE: Submission in response to Notice to Stakeholders: Non-prescription Health Products Containing CBD

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) advocates for pharmacies' role in caring for Canadians. We represent leading pharmacy organizations, including chain, banner, long-term care, grocery chains, specialty pharmacies, and mass merchandisers with pharmacies. Across Canada, we advance the delivery of care through more than 11,500 community pharmacies and their teams, serving as integral community health hubs in urban, suburban, rural, remote and First Nations neighbourhoods.

We are pleased to provide the following comments to help inform Health Canada's ongoing policy work to develop an appropriate regulatory pathway for **non-prescription health products containing cannabidiol (CBD)**.

Above all, we wish to encourage Health Canada to carefully consider the recommendations contained in the recently released report from the *Science Advisory Committee on Health Products Containing Cannabis*, in particular the key recommendation that health products containing CBD, i.e., Cannabis Health Products (CHPs), should be made available exclusively in pharmacies. Neighbourhood Pharmacies fully agrees with this fundamental recommendation. Any product intended for therapeutic use that has the potential for harm or misuse requires some level of health oversight. Pharmacies are ideally positioned to provide this health oversight role for CBD-containing products with stated health claims. The comments we provide are grounded in our expectation that access to CHPs through pharmacies will indeed be a foundational element of any upcoming regulatory pathway.

Pharmacy teams have the expertise to counsel patients and ensure safety at CHP point-of-sale and can bring value in supporting public health and harm reduction.

Pharmacists already have the expertise, skills and professional judgement necessary to educate patients about the appropriate use and potential risks (including drug interactions and contraindications) of all cannabinoid-containing products. Through ongoing competency assessment and professional development, pharmacists continually enhance their clinical

knowledge in all therapeutic areas with evolving evidence, such as the use of cannabis for therapeutic purposes. While current available evidence suggests that oral doses of up to 200 mg/day of CBD is safe and tolerable in healthy adults, all adult patients wishing to use CBD for therapeutic reasons would benefit from the opportunity to review and assess the impact of CBD-containing health products on their health, their other medications and any other substance they may use. More importantly, as even low doses of CBD can have appreciable effects, pharmacy teams can ensure that patients accessing CBD-containing CHPs through a pharmacy are fully educated on what to expect and how to manage effects.

Most cannabis products carry some level of risk of developing tolerance, dependence, and potential misuse. [1] Pharmacists already play a key role in harm reduction, including preventing, monitoring, detecting, and treating medication and substance use disorders arising from the use of any cannabis product, whether a CHP, a natural health product, a cannabinoid-containing prescription pharmaceutical or even recreational cannabis. A significant portion of Canadians value and support pharmacists' ability to provide guidance on cannabis use and risk.[2]

Finally, to minimize patient diversion to recreational or even illicit sources of cannabis for therapeutic purposes, care should be given to ensuring that access to CHPs is not more restrictive than access to recreational cannabis products. Pharmacies can provide a safe and stigma-free environment that facilitates opportunities for Canadians to have important conversations with a healthcare provider on the use of cannabis for health purposes. The advice and guidance pharmacists provide can have a profound impact on patient behaviour; a recent study showed that 69 per cent of respondents could articulate specific beneficial guidance from their pharmacist that positively impacted their cannabis use. [2] Providing CHPs through community pharmacies enables pharmacy teams to amplify public health messages about safety and appropriate use, while reducing the number of Canadians resorting to recreational or even illicit cannabis for health-related reasons.

Ensuring that CHPs are exclusively accessible in pharmacies provides the best combination of convenient access, appropriate health oversight, and ample opportunity for public education.

The pharmacy environment can accommodate the different levels of clinical oversight that may be required for CHP use.

The variety of CHPs that might be brought to market, including their formats, dosages and potencies, will need to be carefully considered in terms of access. Neighbourhood Pharmacies recognizes that this consultation provides an opportunity for additional evidence and feedback on this issue. CHPs made available through pharmacy might be considered Schedule 1, meaning they are accessible "over the counter" within the footprint of the pharmacy and thus can be self-selected. This provides those seeking such products the agency to seek their self-care conveniently but with the opportunity to engage with the pharmacy team. Or CHPs may be considered Schedule 2, meaning they are accessible without a prescription but must be requested from and provided by the pharmacist, which would allow an additional level of patient assessment for product suitability or eligibility (e.g., age eligibility). Community pharmacies have existing infrastructure, workflow, policies and practices to appropriately support the delivery of both kinds of products to Canadians. Ensuring that CHPs are provided exclusively through pharmacy offers Health Canada the flexibility to provide the level of clinical oversight that will ultimately be required. As Health Canada reviews potential regulatory pathways, the pharmacy

sector can adapt to deliver these products safely and effectively while providing necessary oversight where needed.

The wholesale pharmaceutical distribution system available to community pharmacies can be leveraged to support access to CHPs.

We urge Health Canada to consider utilizing the existing wholesale pharmaceutical distribution system to provide CHPs to pharmacies. Canada already has a robust and efficient drug distribution system serving pharmacies. Enabling the distribution of CHPs directly to community pharmacies will streamline the process and integrate easily with existing workflows and processes while providing safe and comprehensive access to eligible patients.

Moreover, restricting CHP access to pharmacies will also allow for adequate distribution security, the management of product recalls and appropriate record-keeping including pharmacovigilance data. This will, however, require clarity on the status and distribution requirements of these products, in particular security and safety measures. The eventual classification of CHPs (e.g., OTC or precursor), will have implications for the distribution capacity and cost associated with warehousing and transporting these products and we urge Health Canada to carefully consider these factors.

Finally, we note that, while the consultation at this time relates to non-prescription health products containing CBD, the recommendations provided by the Science Advisory Committee relating to human use of CHPs are limited to oral CBD products. As more evidence accumulates and the market continues to develop, Health Canada will no doubt continue to consider the health and safety implications of making other forms of CHPs available to Canadians, such as topical formulations. However, as providers of healthcare services, we would be strongly opposed to using community pharmacies as a distribution channel for combustible (i.e., smokable) CHPs. The harms of using combustible products are well-established, and we feel they outweigh any evidence-based health benefits of CBD-containing health products. We are therefore pleased to note the Science Advisory Committee has recommended against this delivery format for CBD-containing CHPs.

As Health Canada begins to also re-examine the Cannabis Act, we see a continued role for a medical stream, particularly as evidence accumulates on appropriate indications for cannabinoids. We look forward to working with Health Canada in this area to optimize the use of the community pharmacy channel to ensure Canadians requiring cannabis-containing products for any therapeutic or medical reason can do so safely and effectively.

Sincerely,



Sandra Hanna, RPh
Chief Executive Officer

1. Ontario Pharmacy Evidence Network. (Jan 2019). Pharmacy in the 21st Century: Enhancing the impact of Pharmacy on people's lives in the context of health care trends, evidence and policies. Page 41. Retrieved from: <https://www.open-pharmacy-research.ca/wp-content/uploads/Future-of-Pharmacy-White-Paper-REVISED-for-posting-Jan-2019.pdf>
2. Medical Cannabis Group. Abacus Data. Medical Cannabis patient Survey. 2020. <https://www.patientaccess.ca/wp-content/uploads/2020/10/Medical-Cannabis-Patient-Survey-Topline-Results-FINAL-1.pdf>