



**Neighbourhood  
Pharmacy**  
Association of Canada

Association canadienne  
**des pharmacies  
de quartier**

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November 21, 2022

Cannabis Act Legislative Review Secretariat  
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**RE: Submission in response to open consultation *Taking stock of progress: Cannabis legalization and regulation in Canada***

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 close to 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 the Government improve Canada's legislative and regulatory framework for cannabis use, in particular the current process for access to cannabis for medical purposes. Our recommendations below respond to the following consultation questions:

1. *What are your views on the current medical access program for cannabis?*
2. *Is a distinct medical access program necessary to provide individuals with reasonable access to cannabis for medical purposes, or can access needs be met through the non-medical framework?*
3. *Are there specific reforms that you would recommend?*

We wish to note that this review of the Cannabis Act comes at a time when the regulatory framework governing access to cannabidiol-containing products making health claims (Cannabis Health Products, or CHPs) is still under development, and the exact nature of the CHPs that will fall under this framework, is still unclear. We recently provided our feedback to Health Canada's Natural and Non-prescription Health Products Directorate on this topic, which centred on the key recommendations put forth by *the Science Advisory Committee on Health Products Containing Cannabis* that CHPs be available exclusively in pharmacies. Our feedback then, and our feedback today continues to be grounded in the key public health and harm reduction role pharmacy can provide for Canadians using cannabis products therapeutically, and what reforms will enable cannabis access through community pharmacies.

**There is a continued need for a regulated pathway to access cannabis for medical purposes with appropriate health oversight that is distinct from access to cannabis for recreational purposes.** Scientific evidence continues to accumulate on the therapeutic benefits of cannabis and its components to alleviate symptoms or ameliorate conditions such as pain, nausea, insomnia, and certain seizure disorders.<sup>[1]</sup> Any product intended for evidence-based therapeutic use that has the potential for harm or misuse must be accessible where users can seek expert guidance from healthcare providers. We know Canadians are using cannabis for health or therapeutic benefits. Statistics Canada reports that more 1 in 5 individuals aged fifteen or over across the country used cannabis in 2019/2020, with 9 per cent of this population using cannabis for medical reasons. Health Canada's 2021 data suggest closer to 14 per cent of all cannabis users take cannabis for medical reasons, including pain management, sleep problems, anxiety, and depression.<sup>[2, 3]</sup> Without a distinct medical stream Canadians would still have the potential to access cannabis, but without the appropriate health oversight to ensure its safe and effective use.

**An effective medical stream must provide Canadians with convenient and equitable access to cannabis for medical purposes.** Many Canadians seeking cannabis for medical reasons report barriers to accessing the medical stream. Various survey data suggests that fewer than one-third (and even as few as 22 per cent) of therapeutic users obtain a medical authorization from a prescriber. These users describe a lack of providers willing to authorize medical cannabis or provide guidance, perceived stigma regarding their desire to use cannabis, and an overall cumbersome process as impediments to the medical stream.<sup>[3,4]</sup> These impediments, coupled with the higher cost of medical products vs. recreational cannabis can drive users to seek recreational cannabis products or even illicit products to treat their symptoms, leaving them without guidance on safe use and putting them at risk of unintended adverse reactions.

To foster a more accessible and distinct medical access stream, we propose that Health Canada:

**1. Support the dispensing of cannabis for medical purposes through community pharmacies**

- Pharmacists already have the expertise, skills, and professional judgement to educate patients about the appropriate use and potential risks (including drug interactions and contraindications) of all cannabinoid-containing products. As early as 2018, in anticipation of the potential for legalized access to cannabis, several pharmacy regulatory authorities and leading pharmacy chains proactively sought to educate and train pharmacists to ensure they were prepared to consult on and dispense medical cannabis products. The Canadian Council on Continuing Education in Pharmacy put in place a national competency-based accreditation process to ensure pharmacists had access to valid training, and the Ontario College of Pharmacists even mandated competency-based cannabis training for pharmacists as a condition of licensure.<sup>[5]</sup> Pharmacists have the requisite clinical knowledge to advise patients on cannabis use for medical purposes.
- Individuals seeking cannabis for medical purposes may have complex conditions, multiple prescriptions or other factors that increase their risk of harm from cannabis. When dispensing any medication, pharmacists assess the appropriateness of the product for the patient; identify and mitigate any potential drug interactions with the rest of their medication regime, and counsel patients on how to optimize their therapeutic

goals. Pharmacists apply the same approach to cannabis for medical purposes, ensuring that patients can use their products safely and with optimal therapeutic effect, while minimizing the potential for adverse reactions.

- Most cannabis products carry some level of risk of developing tolerance, dependence, and potential misuse.<sup>[1]</sup> Pharmacists already play a key role in harm reduction, including preventing, monitoring, detecting, and treating medication and substance use disorders arising from the use any cannabis product, whether it is medical cannabis, 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.<sup>[4]</sup>
- Cannabis users have reported difficulties in finding supportive health practitioners to authorize their use of medical cannabis, leading them seek out other sources. Pharmacies can provide a safe and stigma-free environment that facilitates opportunities for Canadians to have important conversations with a healthcare provider on their 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 that 69 per cent of respondents could articulate specific beneficial guidance from their pharmacist that positively impacted their cannabis use.<sup>[4]</sup> Dispensing medical cannabis through community pharmacies enables pharmacy teams to amplify public health messages about safety and appropriate use.

## **2. Promote the use of existing wholesale pharmaceutical distribution systems to supply community pharmacies with cannabis for medical purposes**

- Dispensing of a health product through pharmacy requires efficient and secure distribution. Canada already has a robust drug distribution system serving pharmacies. Enabling the distribution of medical cannabis directly to community pharmacies using existing available infrastructure will streamline the process and integrate easily with workflows while providing safe, comprehensive, and timely access to eligible patients.
- Moreover, using wholesale distribution to supply medical cannabis to pharmacies will also allow for adequate distribution security, the management of product recalls and appropriate record-keeping including pharmacovigilance data. We note this may require additional reforms regarding the rules and requirements for the manufacture and sale of cannabis for medical purposes, as well additional clarity on security and safety measures.

## **3. Support the ability of pharmacists to authorize medical cannabis**

- Currently, only a small number of healthcare practitioners can officially provide the medical authorization document that allows a patient to legally obtain cannabis products for medical use from a licensed seller, primarily physicians and nurse practitioners. The number of individual healthcare practitioners providing medical authorization documents has, however, declined since medical cannabis was legalized, bolstering reports from Canadians that authorizers are difficult to find.<sup>[6]</sup> Supporting pharmacists' ability to authorize the use of medical cannabis directly would not only give Canadians greater

access to care but also distribute the healthcare burden amongst a broader pool of providers.

- The pandemic has demonstrated how pharmacies and their teams add much needed primary care capacity to the healthcare system, through expanded scopes of practice and authorized activities. Pharmacists in all jurisdictions can now prescribe Schedule 1 drugs for minor ailments, while selected jurisdictions also allow pharmacists to prescribe COVID-19 antiviral therapies, adapt prescriptions for controlled substances, or even initiate biosimilars prescription switches.<sup>[7]</sup> These scope enhancements acknowledge pharmacists' competence as medication management experts and have provided patients with hastened access to their medications by reducing the number of touchpoints individuals must make with the healthcare system. Ensuring that any reforms resulting from the Cannabis Act review will support an expanded role for pharmacists as medical cannabis authorizers will also serve to uncomplicate the cumbersome medical cannabis access process by allowing patients have their medication needs assessed, obtain their authorization, and receive their medical products, counseling, safe use education all in one location with a trusted healthcare provider.

## Conclusion

We are pleased to see this long-awaited review of the Cannabis Act take place. We firmly believe a distinct regulatory pathway for Canadians to legally access and use medical cannabis safely, conveniently and with knowledgeable healthcare practitioner oversight is essential. Expanding the role that Canada's close to 11,500 community pharmacies can play in enabling Canadians to access cannabis for medical purposes by:

- **supporting the dispensing of cannabis for medical purposes through community pharmacies,**
- **promoting the use of existing wholesale pharmaceutical distribution systems to supply community pharmacies with cannabis for medical purposes, and**
- **supporting the ability of pharmacists to authorize medical cannabis,**

will contribute to the goals and purpose of the Cannabis Act, while providing the best combination of clinical guidance, access, and harm reduction opportunities.

We welcome the opportunity to work with Health Canada and appropriate jurisdictional partners and other stakeholders to strategize a way forward for the community pharmacy channel in authorizing, distributing and dispensing cannabis for medical purposes.

Sincerely,



Sandra Hanna, RPh  
Chief Executive Officer

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