



**Neighbourhood
Pharmacy**
Association of Canada

Association canadienne
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Natural and Non-prescription Health Products Directorate Consultation
Health Canada, Government of Canada
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Re: Addressing Youth Access and Appeal: Nicotine Replacement Therapy Products

To Whom It May Concern

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) advocates for pharmacies' role in caring for Canadians. We represent leading pharmacy organizations, including chain, banner, grocery chains, specialty pharmacies, and mass merchandisers with pharmacies. Across Canada, we advance the delivery of care of more than 12,000 community pharmacies and their teams, serving as integral community health hubs in urban, suburban, rural, remote and First Nations neighbourhoods. We advocate at the federal level on policy issues with a potential pan-Canadian impact on pharmacies' ability to deliver care and services to their patients.

We are pleased to provide some high-level feedback to Health Canada as it considers additional legislative and/or regulatory mechanisms to better protect youth from against the health risks of unintended use of certain Nicotine Replacement Therapies (NRTs)

Depending on the dose of nicotine provide, NRTs are currently regulated as either prescription drugs, or as Natural Health Products (NHPs). The NRTs that currently fall under NHP regulations are regulated in a manner appropriate for the lower-risk nature of these products. Earlier this year, we stated our support for the federal government's plan to implement new regulatory oversight for NHPs "*This additional oversight will help protect the health and safety of Canadians by ensuring that these products meet the excellence in standards that we all expect. This will also give pharmacy teams and the communities they serve access to better information to make informed decisions when educating on or selecting natural health products.*"

We are pleased to provide key considerations from the perspective of pharmacy operators, one of the current retail sites where certain nonprescription NRTs are available to Canadians as self-selected products within the pharmacy space.

We recognize that innovations in NRT and adjacent products may be particularly appealing to and accessed by youth, even though intended and approved only for those 18 years and older. We wholeheartedly support Health Canada's public health goal of protecting youth, and further believe that no individual under the age of 18 should be using NRTs for any purpose without the oversight of a healthcare provider.

However, we have some concerns with potential policy options regarding the Point of Sale of NRTs, including the possibilities of:

- Limiting sales of NRTs to pharmacy settings
- Requiring age verification in any retail setting
- Requiring that NRTs be sold “behind the counter” in pharmacies

Neighbourhood Pharmacies believes that any product intended for therapeutic use, with a potential for misuse or unintended harm, should be accessible through pharmacies, given the public health and harm reduction role pharmacy teams already provide. Currently, patients have the autonomy of self-selecting a non-prescription NRT while also having the agency to choose to engage with an accessible healthcare provider regarding the optimal use of the product, discuss their smoking behaviour, or seek cessation assistance.

Requiring an age verification process by pharmacy professionals working in community pharmacies could potentially use substantial amounts of healthcare provider time; that could be better spent providing clinical services and direct patient care. Pharmacies across the country are already expanding the clinical services they offer to add much needed capacity to the healthcare system through increased delivery of vaccinations, prescribing for varied conditions, and chronic disease management. Using these in-demand healthcare resources for administrative age-screening processes is not an effective strategy.

Moving NRTs ‘behind the pharmacy counter’ could also place additional burden on pharmacy professionals already operating under considerable constraints. However, we recognize this will increase the number of opportunities for patients considering NRT to interact with a pharmacy professional for health education on NRT products or even additional smoking cessation counseling.

Requiring individuals seeking NRT to assist with their smoking cessation to request products at the pharmacy counter may add more challenges to accessing smoking cessation therapies. There continues to be a great deal of stigma attached to smoking behavior. Required interaction with a pharmacy professional may have the unintended consequence of decreasing patient access to the very products they need. This may increase the risk of those smokers continuing to smoke, or worse, diverting back to smoking after some level of cessation.

We feel that many of the Government of Canada’s other proposed measures that focus on ensuring the labelling, packaging, flavours and marketing materials related to NRT products are designed not to apply to youth, are likely to be more effective measures of deterring youth access of NRT products, without the unintended consequence of reducing access for those patients who need them.

Thank you for the opportunity to provide this feedback.

Sincerely,



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