



**Neighbourhood
Pharmacy**
Association of Canada

Association canadienne
**des pharmacies
de quartier**

1205-3230 Yonge Street
Toronto, ON M4N 3P6
T: 416.226.9100
F: 416.226.9185
info@neighbourhoodpharmacies.ca
neighbourhoodpharmacies.ca

July 4, 2024

Regulatory Affairs
Strategic Policy, Cannabis
Controlled Substances and Cannabis Branch
Health Canada
Email: cannabis.consultation@hc-sc.gc.ca

RE: Submission in response to open consultation on proposed amendments to regulations concerning cannabis: Streamlining of requirements

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 pharmacy's ability to deliver care and services to their patients.

We commend the federal government for its progress on an improved and streamlined overall regulatory framework regarding cannabis products. We were encouraged by the release of Health Canada's final report regarding the legislative review of the Cannabis Act, in particular Recommendation 42, which validated the need to improve patient access to medical cannabis by allowing for dispensing from pharmacies; and Recommendation 46, which acknowledged the need for advancement of a regulatory pathway for CHPs.

We note, however, that this set of regulatory amendments is not pursuant to patient access to cannabis for medical or therapeutic purposes, nor does it address regulatory framework for cannabis health products (CHPs) containing cannabidiol. We anticipate further regulatory development in these areas and look forward to working with Health Canada to provide pharmacy's perspective on ensuring Canadians can access these therapeutic products when they need them.

Our position and recommendations regarding these products remains unchanged.

- We believe there is still a need for a distinct regulatory pathway for Canadians to access cannabis for health and therapeutic purposes. Our [November 2022 submission regarding the Cannabis Act Review](#) encouraged Health Canada to support an expanded role for the pharmacy sector in authorizing, distributing and dispensing medical cannabis. Access to cannabis through neighbourhood pharmacies in communities

across Canada offers important and accessible clinical oversight by a healthcare provider. It also brings essential opportunities for patients to be educated by their pharmacist on the safe and effective use of cannabis.

- In addition, our [October 2022 submission to the consultation Cannabis Health Products](#) advocated that cannabis health products (CHPs) containing CBD be accessible through pharmacies, given the public health and harm reduction role pharmacy can provide for these therapeutic products.

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. 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 as well as providing access to CHPs.

Thank you for the opportunity to provide this feedback.

Sincerely,



Shelita Dattani, Pharm.D., RPh
Senior Vice President, Pharmacy Affairs and Strategic Engagement