



**Neighbourhood  
Pharmacy**  
Association of Canada

Association canadienne  
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Natural and Non-prescription Health Products Directorate  
Health Products and Food Branch  
Health Canada  
Email: [nnhpd.consultation-dpsnso@hc-sc.gc.ca](mailto:nnhpd.consultation-dpsnso@hc-sc.gc.ca)

**RE: Submission in response to consultation: Towards a pathway for health products containing cannabidiol**

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) represents leading pharmacy organizations across the country, including chain, banner, grocery chains, specialty pharmacies, mass merchandisers and independent pharmacies. Nationally, we advance the delivery of care through more than 12,000 pharmacies and their teams, that serve as integral community health hubs in urban, suburban, rural, remote and First Nations neighbourhoods.<sup>1</sup> Canada's pharmacies employ more than 185,000 Canadians, including 38,000 licensed pharmacy professionals, who dispense more than 847 million prescriptions per year valued at \$36 Billion.<sup>2,3</sup> The sector generates an estimated \$9.5 Billion in GDP, while its total economic footprint is more than \$18.7 Billion.<sup>4</sup>

As the only pan-Canadian association representing pharmacy operators, we act to support policy makers with the development of innovative solutions that allow pharmacies to support primary care while advocating for fair and sustainable funding for community pharmacies.

Neighbourhood Pharmacies appreciates the opportunity to provide feedback to Health Canada regarding its proposal to establish a regulatory pathway for Natural Health Products Containing Cannabidiol (NHPCCs). In addition, we are providing recommendations for consideration regarding the provision of cannabis for medical purposes through community pharmacies.

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<sup>1</sup> IQVIA Canada. Pharmacy Market Insights. MAT March 2025

<sup>2</sup> Ibid.

<sup>3</sup> National Association of Pharmacy Regulatory Authorities. National Statistics. January 2025

<sup>4</sup> Conference Board of Canada. Adapted from Economic Footprint of Canada's Community Pharmacy Sector. 2017

## Access to Natural Health Products Containing Cannabidiol (NHPCCs) Via Community Pharmacies

### *Clinical Oversight, Public Health, and Harm Reduction*

Cannabis-containing products should not be treated as generic consumer goods. Canadians expect that products with therapeutic claims—especially those intended to replace or complement existing drug therapy—come with the same level of professional guidance they receive when managing other health conditions. Providing NHPCCs exclusively through community pharmacies will ensure Canadians have timely access to a pharmacist who can provide the appropriate clinical oversight.

Cannabis-containing products are widely used across Canada for therapeutic purposes, including for pain, anxiety, and sleep-related concerns. However, much access currently occurs outside of regulated healthcare channels, limiting opportunities for appropriate guidance, safety monitoring, and integration into patients' broader treatment plans. 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. Other retail settings simply cannot offer this level of patient care and expertise. Providing NHPCCs through Canada's 12,000+ community pharmacies will ensure Canadians have convenient access to a trained health care provider to ensuring that patients can use their products safely and with optimal therapeutic effect.

Pharmacy teams have the expertise to counsel patients at NHPCC point-of-sale and can bring value in supporting public health and harm reduction. Many products carry some level of risk of developing tolerance, dependence, and potential misuse.<sup>5</sup> Pharmacists already play a key role in harm reduction, including preventing, detecting, and treating medication and substance use disorders arising from the use of any cannabis product, whether an NHPCC, cannabis for medical purposes or even recreational cannabis. A significant portion of Canadians value and support pharmacists' ability to provide timely and accessible guidance on cannabis use and risk.<sup>6</sup> Pharmacies and their teams are well placed to amplify public health messages on appropriate and safe use of cannabis products.

Emerging evidence suggests that many patients are turning to medical cannabis as a substitute for opioids and other high-risk medications, reporting improved symptom control and fewer side effects.<sup>7,8,9</sup> However, effectiveness varies depending on the condition being treated, such as chronic pain, sleep, anxiety, or mood, and cannabis itself can cause adverse effects like

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<sup>5</sup> Health Canada. Information for Health Care Professionals. Cannabis (marihuana, marijuana) and the cannabinoids. Potential therapeutic uses. 2018

<sup>6</sup> Medical Cannabis Group. Abacus Data. Medical Cannabis patient Survey. 2020

<sup>7</sup> Boehnke KF, Litinas E, Clauw DJ. Medical Cannabis Use Is Associated with Decreased Opiate Medication Use in a Retrospective Cross-Sectional Survey of Patients with Chronic Pain. *The Journal of Pain*. 2016;17(6):739-744

<sup>8</sup> Boehnke KF, Scott JR, Litinas E, Sisley S, Williams DA, Clauw DJ. Pills to Pot: Observational Analyses of Cannabis Substitution Among Medical Cannabis Users With Chronic Pain. *The Journal of Pain*. 2019;20(7):830-841.

<sup>9</sup> Reiman A, Wely M, Solomon P. Cannabis as a Substitute for Opioid-Based Pain Medication: Patient Self-Report. *Cannabis and Cannabinoid Research*. 2017;2(1):160-166.

dizziness, cognitive impairment, or fatigue.<sup>10,11</sup> This variability, along with potential drug interactions, demonstrates the need for professional healthcare involvement to provide safe, individualized guidance. Pharmacists in community pharmacy settings can effectively support patient education, monitor for side effects, and optimize therapeutic outcomes with cannabis-based treatments.

### *Flexible Scheduling and Supportive Infrastructure*

The variety of NHPCCs that might be brought to market, including their formats, dosages and potencies, will need to be carefully considered in terms of access. The pharmacy environment can accommodate multiple levels of clinical oversight and patient intervention. Pharmacy-based self-selection (Schedule III, or “OTC”) preserves patient agency while ensuring access to pharmacist support when needed. Pharmacist-assisted distribution (Schedule II, or “Behind the counter”) will ensure clinical engagement when warranted. Such a tiered structure can mirror how nicotine replacement therapies (NRTs) are currently scheduled in pharmacies—with novel formats placed behind the counter and established products available in-aisle. Not all patents will require pharmacist intervention, however, pharmacies are well equipped to support a flexible scheduling framework that provides the best combination of stigma-free, convenient access coupled with appropriate health oversight.

The community pharmacy channel also offers the opportunity to use existing wholesale pharmaceutical distribution systems to provide NHPCCs to pharmacies (as either Schedule II or III products). Canada already has a robust and efficient drug distribution system serving pharmacies. Enabling the wholesale distribution of NHPCCs directly to community pharmacies will streamline the process and integrate easily with existing workflows, storage and security parameters while providing safe and comprehensive access to eligible patients,

### **Expanding community pharmacy’s role in the provision of medical cannabis**

As Health Canada continues to modernize the regulatory landscape for cannabis, there is an opportunity to better leverage the clinical, public health, and harm reduction advantages provided by the community pharmacy distribution channel, that further ensures Canadians requiring cannabis-containing products for any therapeutic or medical reason can do so safely and effectively.

### *Transition to pharmacist dispensing*

Evolving the current multi-step access pathway for medical cannabis (which can include registering with a licensed producer, ordering products online, applying to grow your own supply), to traditional community pharmacy dispensing would embed routine interaction, face-to-face counselling, and documented continuity of care within the existing medication-safety infrastructure. Pharmacies are equipped with the tools to support therapeutic monitoring, documentation, pharmacovigilance, and integration into broader health system records. Medical cannabis products dispensed through pharmacy can be recorded in patient profiles and shared with other providers.

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<sup>10</sup> Jeddi HM, Busse JW, Sadeghirad B, et al. Cannabis for medical use versus opioids for chronic non-cancer pain: a systematic review and network meta-analysis of randomised clinical trials. *BMJ open*. 2024;14(1):e068182

<sup>11</sup> Whiting PF, Wolff RF, Deshpande S, et al. Cannabinoids for Medical Use. *JAMA*. 2015;313(24):2456.

Given the evolving evidence base related to the safety and efficacy of cannabis for medical purposes, involving community pharmacies in the dispensing of medical cannabis allows patients' cannabis use to be integrated in their overall care.

### *Pharmacy-led assessment and prescribing services for medical cannabis*

Pharmacists should be enabled to assess a patient for appropriateness of cannabis for therapeutic purposes and recommend or prescribe a cannabinoid-containing treatment – which could include products currently regulated as cannabis for medical purposes. All provinces in Canada now authorize pharmacists to assess patients and prescribe appropriate Schedule I medications for a broad range of minor ailments—a policy shift that has proven highly successful in increasing access to timely care, reducing strain on other parts of the healthcare system, and demonstrating pharmacists' effectiveness as front-line providers. Drawing on this experience, pharmacists are well equipped to assess patients and support appropriate access to medical cannabis, applying the same clinical judgment, safety protocols, and patient-centred approach.

Enabling pharmacists to prescribe medical cannabis within a structured, evidence-informed framework would enhance patient access, reduce delays in care, and provide appropriate oversight in therapeutic use. This is particularly important for populations with limited access to prescribers, or for individuals already relying on pharmacy teams for clinical guidance. A pharmacist-led prescribing model would also align with international best practices and support a more integrated approach to cannabis within the Canadian health care system

### *Fair and reasonable remuneration to pharmacies for cannabis therapy assessments*

We would also like to take this opportunity to encourage Health Canada's support of public funding of pharmacy-provided cannabis assessment and prescribing services. A fair and reasonable fee system should be championed to increase patient access to cannabis treatments, similar to the provincial pharmacy minor ailments assessment and prescribing service programs in each province. These programs acknowledge the skilled tasks involved in carrying out the clinical and technical functions of patient assessment (including medication history, symptom assessment and patient referral if necessary), appropriate treatment recommendations (which could include prescribing of medical cannabis, or NHPCC recommendations), patient counseling, monitoring, and documentation and communication with the primary care provider. Remuneration for both assessment and prescribing for cannabis therapy supports increasing healthcare access and capacity at a critical time in our increasingly pressured health care system.

## **Summary**

Our feedback and recommendations reflect the essential role pharmacies, and their teams, can play in enabling safe, effective, and system-integrated access to therapeutic cannabis-containing products. We recommend that:

- NHPCCs should be made exclusively available in community pharmacies, who can provide the most beneficial combination appropriate clinical oversight, supportive public health and harm reduction intervention, and convenient and stigma-free access. The community pharmacy channel also offers flexible access options and robust existing drug distribution systems.

- Health Canada should also consider expanding community pharmacy's role in the provision of medical cannabis, by enabling pharmacy dispensing of medical cannabis, as well as supporting programs for appropriately remunerated community pharmacy cannabis therapy assessment and prescribing services.

We look forward to supporting Health Canada to optimize the use of the community pharmacy channel to ensure Canadians using cannabis-containing products for any therapeutic or medical reason can do so conveniently, safely and effectively.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Hanna', with a stylized flourish at the end.

Sandra Hanna, RPh. LLM. ICD.D  
Chief Executive Officer  
Neighbourhood Pharmacy Association of Canada