



**Neighbourhood  
Pharmacy**  
Association of Canada

Association canadienne  
**des pharmacies  
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Secretariat, National Drug Scheduling Advisory Committee  
National Association of Pharmacy Regulatory Authorities (NAPRA)  
M615-1554 Carling Avenue  
Ottawa ON K1Z 7M4  
Via email: ndsac@napra.ca

**Re: Proposed Change to the Scheduling Status of Bisacodyl 10 mg Suppositories in Package Sizes Containing 10 Suppositories (100 mg total)**

Neighbourhood Pharmacies appreciates the opportunity to provide input regarding the proposal to **reclassify bisacodyl 10 mg suppositories in package sizes containing 10 suppositories (100 mg total) from Schedule III to Unscheduled status.**

Neighbourhood Pharmacies is Canada's national association representing pharmacy operators across the country, including independent, banner, chain, specialty, and grocery-based pharmacy businesses. Our members serve Canadians in urban, rural, remote, and underserved communities and are committed to supporting accessible, high-quality patient care through community pharmacy. As an association focused on supporting thriving pharmacy businesses and sustainable pharmacy care delivery, we believe scheduling decisions must appropriately balance consumer access with patient safety and professional oversight.

**Recommendation: Neighbourhood Pharmacies recommends that bisacodyl 10 mg suppositories in package sizes containing 10 suppositories remain classified as Schedule III products.**

We do not believe sufficient evidence has been presented to justify expanding unscheduled access beyond the current threshold of 50 mg total per package. The existing scheduling framework appropriately balances timely patient access with the important safeguard of pharmacist involvement.

**Current Scheduling Framework Already Provides Appropriate Access**

Currently, bisacodyl suppositories are exempt from Schedule III only in package sizes containing no more than 5 suppositories (50 mg total). This framework was intentionally designed to provide convenient access for short-term self-care while maintaining pharmacist oversight for larger quantities associated with prolonged use.

Importantly, community pharmacies are among the most accessible healthcare destinations in Canada. Pharmacies are located in virtually every community and provide extended hours, walk-in access, and immediate access to healthcare professionals without the need for an appointment. For many Canadians, the community pharmacy is the first and most readily available point of care within the healthcare system.

The current Schedule III framework does not create a meaningful barrier to access. Patients are still able to conveniently access these products within the pharmacy environment while retaining the benefit of pharmacist availability and professional guidance when appropriate. This approach appropriately balances accessibility, convenience, and patient safety.

The proposal before the Committee would effectively double the amount of bisacodyl available for unsupervised use without any corresponding evidence of unmet patient need, access barriers, or improved patient outcomes. Given the accessibility and convenience already provided through community pharmacies, Neighbourhood Pharmacies does not believe further deregulation is necessary to support patient access.

### **Pharmacist Oversight Remains an Important Patient Safety Safeguard**

Constipation is a symptom that may be associated with a range of underlying medical conditions requiring professional assessment, including bowel obstruction, inflammatory bowel disease, gastrointestinal pathology, rectal bleeding, medication-related adverse effects, or other serious conditions.

Pharmacists play an important role in identifying when self-care is appropriate and when further medical evaluation is required. The current Schedule III classification preserves an important opportunity for professional assessment and counselling at the point of care. Making these products available outside a pharmacy removes pharmacist oversight for larger package sizes diminishes an important clinical safeguard without clear evidence that doing so would improve patient care.

At a time when many Canadians are experiencing challenges accessing primary care providers and timely medical assessment, community pharmacists continue to serve as one of the most accessible healthcare professionals within the system. Scheduling decisions should avoid creating conditions that could increase the likelihood of inappropriate self-treatment, delayed diagnosis, or negative medication outcomes for vulnerable patients who may already face barriers to accessing broader healthcare services.

### **Larger Pack Sizes May Increase the Risk of Prolonged and Inappropriate Use**

Bisacodyl suppositories are stimulant laxatives intended for short-term use only, and larger package sizes may encourage prolonged or repeated self-treatment without professional intervention, increasing the risk of electrolyte imbalance, dehydration, impaired bowel function or dependence, masking of underlying disease, and delayed diagnosis of serious gastrointestinal conditions. These risks are particularly relevant in vulnerable populations such as older adults, individuals with chronic medical conditions, post-surgical patients, and those taking multiple medications.

The existing Schedule III framework provides an important checkpoint that supports safe use while maintaining patient access within the pharmacy environment.

## **International Regulatory Context Does Not Support Further Deregulation**

Neighbourhood Pharmacies notes that comparable international jurisdictions continue to maintain pharmacist oversight for rectal bisacodyl stimulant laxatives. The proposed change would make Canada more permissive than several peer jurisdictions without clear evidence supporting improved safety or patient outcomes.

In the absence of compelling evidence demonstrating that consumers can safely self-select and appropriately use larger package sizes without professional oversight, we do not believe further deregulation is warranted.

## **The Importance of Community Pharmacy in Patient Care**

Community pharmacies are among the most accessible points of care within Canada's healthcare system. Pharmacists and pharmacy teams regularly provide front-line assessment, counselling, triage, and referral for patients managing self-care conditions such as constipation. Scheduling decisions should recognize and preserve the important role community pharmacy plays in supporting safe medication use and early identification of potentially serious health concerns.

Reducing pharmacist involvement for products that carry meaningful risks when used inappropriately may appear operationally minor, but cumulatively these decisions diminish opportunities for pharmacists to provide clinical care and undermine the value community pharmacy contributes within the broader healthcare system.

For many patients the community pharmacy is often the first and most accessible healthcare touchpoint. Preserving pharmacist oversight for products such as bisacodyl suppositories helps ensure patients continue to benefit from professional guidance, assessment, and timely referral when needed.

## **Conclusion**

Neighbourhood Pharmacies respectfully recommends that the National Drug Scheduling Advisory Committee maintain the current Schedule III status for bisacodyl 10 mg suppositories in package sizes containing 10 suppositories (100 mg total).

The current framework appropriately balances patient access and safety while preserving an important opportunity for pharmacist oversight and patient counselling. No compelling evidence has been presented to demonstrate that expanding unscheduled access would improve patient outcomes or address a meaningful access gap.

Most importantly, scheduling decisions should not inadvertently diminish the important and evolving role of community pharmacy in Canada's healthcare system. Pharmacists remain essential healthcare providers whose clinical judgment, accessibility, and patient relationships contribute meaningfully to safe and effective self-care.

Sincerely,

A handwritten signature in black ink, appearing to be 'S. Hanna', written in a cursive style.

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