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Manitoba College of Pharmacists

Consultation on a New Inter-Provincial/Territorial Pharmacy Care Practice Direction

August 12, 2026

Submitted by:

Neighbourhood Pharmacy Association of Canada

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) represents leading pharmacy organizations across the country, including chain pharmacies, grocery and/or mass merchandizers with pharmacies, banners and independent pharmacies, and pharmacies providing specialty medicines and services. In Manitoba, we advance the delivery of care of close to 500 pharmacies of all models, that serve as integral community health hubs in urban, suburban, rural, remote and First Nations neighbourhoods.

As the only Canadian association mandated to represent the voice of pharmacy operators, we act in Manitoba and across the country to support policy makers with the development of innovative solutions that allow pharmacies to support public health and primary care needs in their communities while advocating for a thriving and sustainable pharmacy sector.

We are pleased to provide comments on the proposed ***New Inter-Provincial/Territorial Pharmacy Care Practice Direction***, intended to provide clarity and direction to pharmacists and pharmacy owners regarding cross-provincial care.

To align with the College's consultation process, we have structured our submission to respond directly to each of the feedback questions in the consultation survey.

Scope, objectives and definitions

Neighbourhood Pharmacies supports the College's objective of providing greater clarity regarding interprovincial pharmacy practice. As pharmacy care becomes increasingly virtual, new technology innovations for care delivery proliferate, a clear regulatory framework is necessary. In our view, the proposed Practice Direction clarifies the requirements for pharmacy care delivered across provincial and territorial boundaries. Specifically, it clarifies that pharmacy practice is considered to occur where the patient is located, establishes expectations for when Manitoba registration is required for pharmacists providing care to Manitoba patients, outlines expectations for Manitoba pharmacists providing care to patients in other jurisdictions, and provides guidance on documentation and regulatory accountability for interprovincial practice.

We appreciate that the proposed Practice Direction is largely principles-based and focuses on clarifying regulatory expectations rather than prescribing detailed operational processes. This approach provides pharmacy operators with the flexibility to determine how best to meet regulatory requirements while maintaining patient safety and professional accountability. We encourage the College to continue adopting this principles-based approach in future regulatory instruments wherever appropriate.

We also encourage the College to ensure that the Practice Direction remains technology-neutral. The framework should facilitate innovation in pharmacy practice while protecting patient safety, rather than unintentionally restricting new models of care.

We encourage the College to consider this Practice Direction within the broader context of interprovincial pharmacy practice. While each province will continue to establish its own regulatory framework, unnecessary variation between jurisdictions increases complexity for pharmacists and pharmacy operators, creates barriers to innovation, and can limit patients' timely access to care. Where appropriate, the College should seek alignment with common approaches adopted elsewhere in Canada while maintaining Manitoba's ability to regulate in the public interest.

Out-of-province pharmacists providing care to patients in Manitoba

We support the College's objective of ensuring that Manitoba patients receive safe, high-quality care regardless of where a pharmacist is located. However, we recommend that any requirement for Manitoba registration be limited to activities that genuinely warrant direct Manitoba regulatory oversight.

The proposed Practice Direction distinguishes between activities that require Manitoba registration and activities that do not. We encourage the College to clearly articulate the principles used to establish these categories and to determine when Manitoba registration is necessary. A transparent, principles-based framework will provide greater certainty for pharmacists and pharmacy operators and will be better able to accommodate evolving models of pharmacy practice and new clinical services without requiring frequent amendments to the Practice Direction.

For those activities that the College has determined do not require Manitoba registration, duplicative registration should not be imposed where an individual is already licensed and in good standing elsewhere in Canada.

Manitoba pharmacists providing care to patients outside Manitoba

We support clarifying that Manitoba pharmacists must comply with the requirements of the jurisdiction in which the patient is located.

However, the College should recognize that pharmacists and pharmacy operators should not be expected to independently interpret and monitor detailed regulatory requirements across every Canadian jurisdiction.

Interprovincial pharmacy practice is becoming increasingly common. Significant differences in regulatory requirements between provinces create complexity for pharmacy operators, increase compliance costs, and reduce the ability to efficiently deploy pharmacist resources across jurisdictions. Wherever possible, regulators should work collaboratively to reduce unnecessary differences in regulatory expectations while continuing to protect the public.

Documentation, Compliance and Adjudication

Documentation requirements should be limited to information that is necessary to support continuity of care, patient safety and regulatory accountability.

We recommend avoiding documentation requirements that duplicate information already captured within pharmacy management systems or electronic health records. Wherever possible, documentation expectations should align with existing workflows and leverage available digital technologies to minimize administrative burden on pharmacy teams.

Documentation expectations should also be consistent with those adopted in other Canadian jurisdictions wherever practical, reducing unnecessary variation in operational processes for pharmacies serving patients across multiple provinces.

The proposed Practice Direction would benefit from additional clarity regarding regulatory oversight where care crosses provincial boundaries. In particular, we encourage the College to clarify:

- how complaints involving multiple jurisdictions will be managed;
- the respective roles of Manitoba and other provincial regulators;
- expectations for cooperation between regulators; and
- how conflicting standards or requirements between jurisdictions will be addressed.

Where two provinces have differing requirements, pharmacists and pharmacy operators may face uncertainty regarding which standard prevails. We encourage the College to provide practical guidance on resolving conflicts between provincial requirements to support compliance and consistent patient care. Clear guidance will provide greater certainty for both pharmacists and pharmacy operators.

Additional comments

We encourage the College to continue modernizing its regulatory framework to reflect the increasingly interconnected nature of pharmacy practice across Canada.

While the proposed Practice Direction provides valuable clarity regarding jurisdiction, professional accountability and the regulatory framework for interprovincial pharmacy practice, it does not address broader operational models that increasingly support efficient patient care. Pharmacy operators increasingly deliver care across multiple jurisdictions through integrated clinical services, virtual care models, centralized support functions and shared operational infrastructure. While the regulatory oversight of pharmacy practice appropriately remains provincial, unnecessary differences in regulatory expectations create operational inefficiencies that increase costs and reduce the scalability of innovative patient care models. We encourage continued collaboration among Canadian pharmacy regulators to reduce unnecessary variation wherever possible while preserving each regulator's authority to protect the public.

Conclusion

Neighbourhood Pharmacies supports the College's efforts to provide greater clarity for interprovincial pharmacy care and welcomes the principles-based approach reflected in the proposed Practice Direction. As models of care become increasingly virtual, integrated and interprovincial, regulatory frameworks must continue to protect patients while enabling innovation and timely access to care.

We encourage the College to consider the operational realities of providing care across provincial boundaries and, wherever possible, work with other Canadian pharmacy regulators toward greater consistency in regulatory expectations. Reducing unnecessary duplication and variation will support pharmacists and pharmacy operators in delivering safe, efficient and innovative care across Canada.

Neighbourhood Pharmacies appreciates the opportunity to contribute to this consultation and looks forward to continuing to work collaboratively with the College as interprovincial pharmacy practice evolves.

