



**Neighbourhood
Pharmacy**
Association of Canada

Association canadienne
**des pharmacies
de quartier**

365 Bloor Street East, Suite 2003
Toronto, ON M4W 3L4
T : 416.226.9100
F : 416.226.9185
info@neighbourhoodpharmacies.ca
neighbourhoodpharmacies.ca

October 26, 2017

Hon. Mark Furey
Attorney General, Minister of Justice and MLA, Lunenburg West
Province of Nova Scotia
1690 Hollis Street
P. O. Box 7
Halifax, NS B3J 2L6

RE: NOVA SCOTIA CANNABIS CONSULTATION

Dear Minister Furey;

Please accept this letter as the submission from the Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) in response to the recently announced Nova Scotia Cannabis Consultation, being led by the Department of Justice. As the government asks for public input on such key issues as the age to purchase and use for recreational cannabis, and where it can be purchased and used, we believe that at the same time the Nova Scotia government should not lose sight of the critical issue of access to cannabis used for medicinal purposes.

Neighbourhood Pharmacies represents the business of pharmacy in Canada and advocates for the country's leading pharmacy organizations delivering high-value quality healthcare to Canadians. Our members include chain, banner, long-term care, specialty and independent pharmacies as well as grocery chains and mass merchandisers with pharmacies. Our focus is on improving the environment for the delivery of patient-centred care while fostering the conditions for business success. We believe these goals are not incompatible. By leveraging the capacity of over 10,000 points of care from coast to coast, with pharmacies located in virtually every neighbourhood, our members aim to advance sustainable, optimal and equitable healthcare.

As you know, the parliamentary process is now well underway leading to the passage of Bill C-45, which will legalize and strictly regulate cannabis, by July 2018. At the same time, the federal government has turned over the responsibility for access, distribution, pricing, sale and taxation to the provinces and territories. Neighbourhood Pharmacies agrees with your government's stated first priority under this consultation, i.e. keeping cannabis out of the hands of children, keeping impaired drivers off the road, and keeping profits out of the hands of organized crime.

However, we believe it is equally important for the Nova Scotia government to make the issue of access to cannabis for medical purposes as much of a public health priority as access to recreational cannabis. Last year, Neighbourhood Pharmacies made a submission to the *Task Force on Cannabis Legislation and Regulation*. At that time, and to this day, we have advocated that pharmacies are best positioned, given their expertise in medication management and with the essential infrastructure already in place, to make medical cannabis available in a patient-centred healthcare system.

Our members strongly believe that the *Access to Cannabis for Medical Purposes Regulations* (ACMPR) under Section 56 of the Controlled Drugs and Substances Act should be amended so that pharmacists and pharmacies can be authorized to distribute and dispense medical cannabis, consistent with the manner in which hospitals and physicians are authorized under the ACMPR. In addition, the Association has made other recommendations calling for:

- a dual system utilizing two frameworks for access, a medicinal one where there is some evidence of therapeutic benefit, and a recreational one, in which access would be strictly controlled and restricted;
- prescription-based access for medical cannabis, with formulations and strengths determined by treatment requirements; and,
- the application of federal regulations to determine minimum national standards for but not limited to age restrictions, packaging, distribution and sale location, form, strength (THC), health warnings, promotion, and marketing, with strict limits on personal possession quantities to protect youths and children from any degree of commercialization.

Neighbourhood Pharmacies members, who account for the vast majority of Canada's 10,000 pharmacies, unanimously support statutory and regulatory changes that would permit pharmacies to dispense medical cannabis, and have signalled their willingness to immediately begin the important work to affirm pharmacy as a responsible and low-risk option to increase access while safely dispensing cannabis for medical purposes.

In the current environment, most Canadians are unaware that many persons receiving prescribed medical cannabis do so without any real degree of clinical advice that, by contrast, comes with prescriptions for other medications. This is a potentially dangerous practice that does not serve the public interest. Pharmacies, by contrast, have the capacity to change this potentially harmful situation and include patients receiving medical cannabis in the continuum of healthcare.

Many of these patients are likely to be receiving medications for other conditions, e.g. diabetes and high blood pressure. However, the consumption of cannabis in combination with blood thinners or benzodiazepines can lead to dangerously low blood pressure, increased risk of bleeding, and disruptions in blood sugar levels. Suboptimal medication management can lead to diminished therapeutic effectiveness, and adverse health events, which would potentially compromise the delivery and cost-effectiveness of provincial and territorial drug plans. Only pharmacies have the highly advanced and

regulated pharmacy distribution network with the essential safeguards in place to ensure clinically appropriate consumption, inventory management, and prevent theft and diversion.

While there is some good evidence that cannabis can be effective in treating chronic pain, chemotherapy-induced nausea and MS symptoms, clinical evidence is limited or inconclusive on its efficacy for many other conditions such as mood disorders, post-traumatic stress syndrome and inflammatory bowel disease. This lack of solid clinical evidence underscores the need for pharmacists' oversight into the use of cannabis, and providing access to medical cannabis in pharmacies will improve the likelihood of safely achieving optimal therapeutic outcomes.

As noted above, the Association believes it is vital that the federal government implement rules that treat the distribution and dispensing of medical and recreational cannabis differently. As we look for solutions to the opioid crisis gripping communities across Canada, the use of medical cannabis for several conditions is a reasonable alternative to higher risk narcotics:

- *Medical cannabis represents a safer alternative to opioid therapy for pain and has been shown to reduce the consumption of opioids.*
- *There have been no documented deaths from medical cannabis overdose.*
- *In comparison with the hazards of different drugs, cannabis showed lower physical dependency, psychic dependency, neural toxicity, overall toxicity and social hazards than Opiates, Cocaine, Alcohol, Benzodiazepines and Tobacco.*

Your support on this significant and timely public health issue is vital, and so we respectfully request that you consider writing to the federal Minister of Health, Hon. Ginette Petitpas Taylor, asking that Health Canada undertake amendments to the ACMPR that would authorize pharmacies to take their rightful place in the safe distribution of cannabis for medicinal purposes. We would also be grateful for an opportunity to meet with you and your colleague, Hon. Randy Delorey, the Minister of Health & Wellness, at your earliest convenience to discuss this issue in greater detail.

Sincerely,



Justin J. Bates
Chief Executive Officer

Cc: Hon. Randy Delorey, Minister of Health & Wellness