



**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

NEIGHBOURHOOD PHARMACY ASSOCIATION OF CANADA'S SUBMISSION ON CANNABIS REGULATION TO THE GOVERNMENT OF BRITISH COLUMBIA

INTRODUCTION

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) appreciates the opportunity to provide this Submission Brief respecting cannabis regulation to the British Columbia Ministry of Public Safety and Solicitor General's Cannabis Secretariat.

Neighbourhood Pharmacies represents Canada's leading pharmacy brands who deliver high value, quality care to Canadians in all models including chain, banner, long-term care, specialty and independent pharmacies as well as grocery chains and mass merchandisers with pharmacies. We advocate for community based care through leveraging our members' high accessibility and proven track record of providing optimal patient care closer to where patients live, work and play. By leveraging the over 10,000 points of care with pharmacies conveniently located in every neighbourhood across Canada, Neighbourhood Pharmacies aims to advance sustainable healthcare for all stakeholders.

We appreciate that the Federal Government's decision to pass Bill C-45 and legalize non-medical or recreational cannabis by July 2018 places the responsibility on the BC government to undertake the necessary policy and administrative work needed to prepare for and implement its policies regarding recreational cannabis. And, given the uniqueness of the BC cannabis environment, compared to other jurisdictions, we commend the Government of BC for implementing the consultation process related to the legalization of recreational cannabis.

SUPPORT FOR BCPHA POSITION AND RECOMMENDATIONS

At the outset, we wish to express our general support for the BC Pharmacy Association's (BCPhA) response that opposes the BC government's position that separates the public policy and decision-making on recreational and medical cannabis. This approach may be workable in most other Canadian provinces, but is not applicable in BC. Over the past number of years, for a variety of reasons, access to cannabis at a retail level in BC has become unique in that the illegal cannabis "dispensaries" are well established and operated, in many cases under the pretense of selling their product for medicinal purposes. According to Statistics Canada, over 400,000 people use cannabis for medical reasons. Of those, only 130,000 are buying their medication through the government approved, legal mail order Licensed Producers (LPs). This substantiates the BCPhA's and Neighbourhood Pharmacies' position that hundreds of thousands of Canadians are buying their "medicine" from unregulated retailers selling cannabis of unknown origin and with the potential to cause negative impacts to human health.

We also support the BCPhA's two recommendations to the Government of BC in the context of their consultation process on the issue of recreational cannabis:

1. Immediately address the problem with illegal retailers of cannabis calling their operations as "dispensaries".
2. The province of British Columbia should move forward to address the issue of the safe dispensing of medical cannabis in tandem with implementation of the sale of recreational cannabis.

OVERVIEW OF NEIGHBOURHOOD PHARMACIES SUBMISSION

Neighbourhood Pharmacies members wish to ensure that the legislative and regulatory environment currently being shaped for the legalization of cannabis is one that results in a safe and reliable system, where both medical and recreational cannabis are considered as distinct entities. We believe that BC's pharmacies are best positioned, with the expertise and infrastructure to allow medical cannabis to take its rightful place among treatments in the patient-centric health and wellness space of pharmacies. Our members are uniquely able to manage the sale, distribution and dispensing of medicinal cannabis.

Last year, Neighbourhood Pharmacies made a submission to the *Task Force on Cannabis Legislation and Regulation*. 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 can be authorized to distribute and dispense medical cannabis, consistent with the manner in which hospitals and physicians are authorized under the ACMPR, and to ensure that the sale of recreational cannabis is implemented safely and securely. Pharmacies play a significant role in managing the distribution of controlled products and they would be committed to work with all levels of government to ensure that recreational cannabis products are sold legally in pharmacies and that youth consumption is effectively prevented.

Key provisions of the *Cannabis Act* are summarized with Neighbourhood Pharmacies' recommendations for amendments to help the Government deliver on its commitment to legalize, regulate and restrict the use of cannabis in a safe and responsible manner. The overarching theme of the *Cannabis Act* is to prevent youth from accessing cannabis, promote and protect public health and safety and deter cannabis-related criminal activity. The *Cannabis Act* provides the federal government with significant authority to regulate the possession, production, distribution and sale of cannabis for recreational purposes.

ACCESS TO RECREATIONAL AND MEDICAL CANNABIS

The legalization process of cannabis should include two different streams:

1. A Medicinal stream for patients with conditions where there is evidence of the therapeutic benefits of medical cannabis; and,
2. A Recreational stream, which should be under a restricted and controlled environment to manage the potential harmful side effects and usage among minors.

Neighbourhood Pharmacies' members are well positioned to manage the distribution and patient access effectively, to achieve optimal outcomes for patients taking medical cannabis therapy and mitigating adverse events. Patients and doctors already rely on pharmacists to advise on all medications and medication management, including herbal products.

In the current environment, most Canadians are unaware that most persons receiving medical cannabis do so without any real degree of clinical advice that, by contrast, comes with other prescribed or recommended therapeutic products. This is a potentially dangerous practice that does not serve the health interests of British Columbians. Many patients may also be receiving medications for other conditions, e.g. diabetes or high blood pressure. However, the consumption of cannabis in combination with blood thinners or benzodiazepines can lead to 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.

In addition, while there is some evidence that cannabis used for medical purposes can be effective in treating chronic pain, chemotherapy-induced nausea and multiple sclerosis symptoms, clinical evidence is limited and 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 on medical cannabis use, and providing access in pharmacies will improve the likelihood of safely achieving optimal therapeutic outcomes.

- Canadians trust their pharmacist, more than 40% had reported going to the same pharmacist for more than 5 years.
- The College of Family Physicians of Canada has guidelines for the use of medical cannabis treatments that would differ from recreational use.
- Our members have appropriate systems and processes already in place to manage medications effectively – pharmacies are equipped with sophisticated software to monitor drug therapies, monitor usage and to track drug interactions.

Medicinal cannabis should be available in pharmacies by prescription, based on the form and strength related to the condition of the patient, which requires a healthcare provider to assess and continually monitor. For recreational cannabis, the product should be accessible in different strengths and forms to differentiate it from the medicinal product. Recreational cannabis should also be available in a retail pharmacy setting, thus ensuring the rollout to the public is done in a responsible and restricted method to help manage the potential social implications.

Medical cannabis is a viable alternative to opioids:

- Canada is leading in opioid consumption worldwide.
- Although opioids have more medical research, they can pose greater risk to patient health and safety, with detrimental social impact.
- Pharmacists can make recommendations to physicians that patients switch to cannabis as a safer alternative.
- Cannabis delivered other dosage forms not requiring smoking; pharmacists have clinical credibility to steer patients from smoking.

SALE AND POSSESSION

Cannabis should fall under Government Regulations to determine minimum standards including, but not limited to: age restriction, product packaging, distribution and sale location, form, strength (THC), health warning messages, advertising, marketing, access and limits on personal possession quantity to protect youth and children and prevent commercialization. While others may try to step into the role of selling cannabis, pharmacies are the right channel for distribution and dispensing of medical and recreational cannabis for the following six reasons:

1. Pharmacies are readily accessible across all communities – a ready-made rural, suburban and urban network.
2. Proper clinical advice would help ensure those with medical needs are receiving proper treatment and use guidelines. It would allow easier supervision to reduce the risk of dependency. It would also ensure there would be no interference with other prescription treatments the patient may be using.
3. Despite being a natural product, cannabis is known to have serious side effects and potential interactions with prescription medications, as noted above. Therefore, the seemingly uncontrolled access, to cannabis in BC increases the likelihood that cannabis will negatively impact the health and safety of the public. Research indicates a strong association of cannabis use by youth and young adults with the onset of psychiatric disorders, development and cognitive effects, in addition to breathing problems, increased heart rate, and the increased possibility of addiction in individuals who frequently smoke. Health Canada warns that the use of cannabis while intoxicated with alcohol presents an “acute health risk” – thus liquor store distribution could increase this risk.
4. Patients and doctors already rely on pharmacists to advise on all medications and medication management, including herbal products.
5. Neighbourhood Pharmacies members are well positioned to manage the distribution and patient access effectively, to achieve optimal outcomes for patients taking medical cannabis therapy and mitigating adverse events.
6. Pharmacies can leverage an existing pharmacy distribution network that currently handles controlled substances safely. Our members have safeguards in place for medication inventory management and to prevent theft and diversion.

LICENSING, PROMOTION, PACKAGING AND LABELLING

Developing a regulatory framework is only the first piece of this complex public policy challenge. Implementing the framework and ensuring that there is the capacity and infrastructure needed to support it is also vital. Review should be taken for medical and recreational cannabis to provide the product a controlled identifier, similar in nature to a Natural Product Number (NPN), to control the allowable strength and form of the product and increase the traceability of the product. This will ensure a safe distribution and tracking of the product. All dispensing of cannabis should be entered in a patient's electronic health records to manage potential drug interactions and contraindications. This would also allow for the product to be appropriately tracked for limiting the quality or frequency of dispense.

Pharmacists have the necessary tools to begin Pharmacy Dispensing of medical cannabis. Tools have been created to train pharmacists on dispensing medical cannabis:

- Cannabis Reference Guide: Provides robust clinical information and evidence; Includes dosing, side effects, indications for pharmacists.
- Strain Selection Tool: Guidance for physician/pharmacist strain selection; Based on indication, THC levels, medical conditions, etc.
- eLearning Module: CCCEP accredited online course for pharmacists to learn about cannabis and its place in therapy.

The current ACMPR system should be immediately amended to include pharmacies and pharmacists for distribution and dispensing of medical cannabis, mirroring how hospital and physicians are in the ACMPR. Therefore, allowing pharmacies and pharmacists to be part of the "circle of care" of medical cannabis patients, as other healthcare providers who are already playing this role.

Implementation of a standardized tracking number (PIN) for pharmacy to ensure proper documentation and tracking of the intended use of the dispensed product. In moving towards bringing medical cannabis into pharmacy, patient access should be enabled while medical cannabis goes through the process for a DIN to be assigned. In the interim, medical cannabis can be handled in the same way as methadone was handled when it was non-DIN preparation.

CANNABIS TRACKING SYSTEM

A well-functioning supply chain will keep communities' safe and ensure that cannabis misuse, abuse and diversion is minimized. BC pharmacies can leverage its sophisticated pharmacy distribution network that currently handles controlled substances safely. Our members have safeguards in place for medication inventory management and to prevent theft and diversion. Implementation of a standardized tracking PIN for pharmacy to ensure proper documentation and tracking of the intended use of the dispensed product.

In addition, Health Canada has rigorous standards and protocols in place to ensure the safe delivery of narcotics from manufacturer to front line distributors:

- British Columbia's pharmacy distributors already have standards for driving safety.
- High security distribution centers - fully compliant to Health Canada regulations.
- Top level security and tracking for narcotics and controlled substances.
- Fully supported cold chain for temperature sensitive products.
- Driving efficiency and performance.
- British Columbia's pharmaceutical distributors execute order lines annually with greater than 99.9% accuracy.

CONCLUSION AND RECOMMENDATIONS

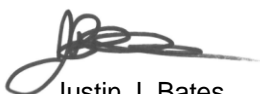
In developing our recommendations, we have outlined six critical conditions that must be met for British Columbians to have safe access to cannabis while ensuring the protection of the public.

- 1. Ensuring Patient and Public Safety:** As with any medical treatment, there should be as high a standard as possible of protection set for the medical cannabis industry. From production to distribution, the treatment must be secure and product un-tampered with.
- 2. Differentiating Medical Cannabis as a Treatment Option:** Medical cannabis is already a prescription-based therapy and the courts have ruled the public has a constitutional right to access. Making a clear distinction between appropriate access to a physician prescribed treatment option opposed to recreational cannabis is vital to ensure the credibility of the treatment. As with any prescription, clinical advice and usage guidelines would differentiate it from a recreational product.
- 3. Establishing Proper Training for Physicians and Pharmacists on Medical Cannabis:** With an aim of reducing risk to patients, education and training should be provided with evidence-based guidelines to provide patients with secure and appropriate care.
- 4. Protecting the Supply Chain:** Continuing best practices from the existing MMPR system and those already in place when dealing with narcotics in pharmacy care, it is integral to the system to ensure safe delivery of the product from producer to patient. This maintains the integrity of the product, while limiting its diversion.
- 5. Utilizing Existing Infrastructure:** Exploiting current practices and infrastructure to reduce unnecessary duplication and delay. This promotes the safety of the product by better leveraging the existing pharmacy system. Only pharmacies and their distributor partners have the necessary broad and seamless distribution system across Canada.
- 6. Improving on the Present Industry - Healthcare Provider Environment:** Pharmacies are strongly aligned in bringing medical cannabis patients into the circle of care by leveraging the inter-professional collaboration with physicians in support of optimal patient outcomes for British Columbians. There is a need for all health providers, including pharmacists, to play an active role in the discussion regarding how best to provide proper care to patients in the government's plans for cannabis legalization.

A properly functioning regulated model that incorporates pharmacies should address the current limitations of the ACMPR system, as well as deal with the challenges inherent in the black and gray markets. Only pharmacies can offer the in-person clinical advice, ease of access, security, and high-quality care to patients. Our professional experience with the complexities of managing controlled products and reputation among British Columbians, enable pharmacy to be the ideal retail space for recreational cannabis to be sold legally and safely within the legal age requirements. Our members are uniquely positioned for the sale, distribution and dispensing of medicinal cannabis and should be at the table to ensure that access to recreational cannabis is implemented in a safe and secure method.

Neighbourhood Pharmacies welcomes the opportunity to provide this information and recommendations to the Government of British Columbia. We believe that pharmacies across British Columbia are uniquely placed to help the Government deliver on its commitment to legalize, regulate and restrict the use of cannabis in a safe and responsible manner. With all this in mind, we respectfully request that the Government of British Columbia consider writing to the federal Minister of Health, Hon. Ginette Petitpas Taylor, asking that Health Canada undertake amendments to the ACMPR, for all the reasons described above. We also encourage the Government of British Columbia to engage with Neighbourhood Pharmacies, as the voice of Canada's pharmacy business, on this critical public health policy issue.

Sincerely,



Justin J. Bates
Chief Executive Officer