

**Written Submission for the Consultation on
Potential Market for Cannabis Health Products That
Would Not Require Practitioner Oversight**

**By: Neighbourhood Pharmacy Association of
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Introduction

The Neighbourhood Pharmacies Association of Canada (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. Our members are home to the most trusted providers of drug therapies, pharmacy-based patient services and innovative healthcare solutions. We advocate for community-based care through 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 10,500 points of care with pharmacies conveniently located in virtually every neighbourhood across Canada, Neighbourhood Pharmacies aims to advance sustainable healthcare for all stakeholders.

Neighbourhood Pharmacies appreciates the opportunity to provide this submission to Health Canada regarding Cannabis Health Products (CHPs). We want to acknowledge Health Canada for recognizing the interest of Canadians in the potential therapeutic use of cannabis, for purposes such as pain relief, without the need for practitioner oversight and for undertaking this consultation to hear from Canadians and industry on this matter.

More and more, cannabis is being embraced as a tool for better health globally. Canada, as the first G20 Country to legalize and regulate cannabis for recreational purposes, has an opportunity to lead. We can demonstrate how to manage, in an evidence-based manner, the risks associated with cannabis use while creating an environment that encourages research into its potential health benefits. We can implement practices that support patient and consumer interests in health products without marginalizing them among recreational users. All of this upholds Health Canada's commitment of ensuring public safety in the sale and use of cannabis products.

Recommendations

Recommendation 1: Canadians should have access to expert support and counseling from pharmacists when they are making health and wellness choices, including for complementary or alternative therapies, such as CHPs.

Recommendation 2: Cannabis health products should be available through pharmacies in a system in which a healthcare provider validates product health claims and can assess and continually monitor their use, dosage and duration.

Recommendation 3: Products being approved as making valid, evidence-based health claims, should be assigned a DIN or NPN, or similar (perhaps a Cannabis Health Product Number – CPN) to validate the health claims made. These products can then be assessed for level of risk to determine scheduling and the level of oversight required.

Recommendation 4: Health Canada should work within its well-established framework for scheduling medications, based on level of risk/oversight required. We therefore recommend scheduling CHPs through NAPRA for most provinces, and by Office des profession for Quebec.

Recommendation 5: As an interim solution, until the process of assigning a DIN (or other identification number) is finalized, Health Canada should assign a Schedule 2 status to all CHPs. Limiting CHPs to sale behind the counter in pharmacies will ensure that all retail requirements are in place for adult use and are able to be upheld (i.e. age gating, record keeping). This will ensure the safe and controlled distribution of CHPs without depriving patients of their need for medical products.

Patient Safety and Health Product Oversight

Interest in the health and wellness aspects of cannabis and related products has piqued among consumers. Canadians, in increasing numbers, are seeking out cannabis products for potential benefits of relaxation, wellness and vitality. However, as the body of evidence continues to grow, patients look to healthcare providers to help interpret the validity of health claims, the risks, benefits, contraindications and potential drug interactions associated with these products.

Canadians should have access to expert support and counseling when they are making health and wellness choices, including for complementary or alternative therapies. Pharmacists are medication and health product experts, working in virtually every community across Canada. Pharmacies are best positioned, given the existing expertise and infrastructure, to bring cannabis for health and therapeutic purposes amongst peer treatments in an already well-established, patient-centric health and wellness space.

Given the professional experience of pharmacists in the complexities of managing controlled products, pharmacists are the ideal channel for dispensing CHPs legally and safely. Pharmacies and pharmacist are the most accessible health professionals in the Canadian health care system and are already playing a significant role in managing the distribution of controlled products and wellness supplements. As Canada's medication experts, pharmacists can evaluate the safety and appropriateness of CHPs for each patient and can best evaluate the place of cannabis for therapeutic purposes for individuals when the patient's entire medication regimen is considered.

By facilitating the safe and secure distribution of CHPs through pharmacies, pharmacists can offer patients a safe alternative care option with careful guidance and close oversight, optimizing positive outcomes for patients while also maintaining the highest standards to protect public safety in the sale and use of CHPs.

Health Canada must continue to safeguard the wellbeing of all Canadians, including for the use of CHPs. Without robust research and evidence of the therapeutic benefits of cannabis products, individual consumers are largely left to forge their own path to safe and informed use of cannabis products for therapeutic purposes. Conversations with a medical expert, such as a pharmacist, are critical to the safe and effective use of CHPs and to enabling Canadians to make informed decisions.

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Product Approvals and Health Claim Validity

Neighbourhood Pharmacies recognizes that, in order for Health Canada to be able to make an informed decision as to the retail regime for non-prescription cannabis health products, we must first establish clear definitions related to CHPs for therapeutic use.

As such, Neighbourhood Pharmacies calls on Health Canada to engage in further consultations with Canadians and stakeholders in developing a clear definition of both "health claims" and "wellness claims." Without clear definitions, Canadians risk being misled by producers regarding the benefits of a CHP.

It is clear that clinical oversight and safeguards are critical to the use of any medication or natural health product where health or therapeutic claims are made. In particular, we noted the consultation document mentions sleep and pain as conditions that could be treated by CHPs. We would contend that these are conditions for which we are most likely to see the diversion and abuse of products. Pharmacies are uniquely positioned to ensure quality control and product integrity while limiting the potential for related possible harms and unintended consequences. Additionally, with a robust system of medication management already in place, pharmacy and pharmacists are best positioned to identify and notify Canadians promptly regarding recalls and related notices with respect to controlled substances and health products, including CHPs. It is therefore critical that we provide considerable oversight of health claims made regarding CHPs, and in their use for treating these conditions.

Separation of recreational cannabis and CHPs at the retail level

Health should not be conflated with the recreation or adult use market however, Canada's current regulatory framework does just that. Health-seeking Canadians should have opportunities to access products that support their health and wellness goals without concern for being marginalized among recreational users. In addition, when considering products intended to provide therapeutic benefits, the validity of health claims made by CHPs would carry more weight if sold in the pharmacy or another known health setting rather than in a recreational/adult use retail setting. Cannabis health products should be available through pharmacies in a system in which a healthcare provider validates product health claims and can assess and continually monitor their use, dosage and duration.

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Scheduling

Drug schedules are important to the proper management of the sale of health and wellness products as they determine whether a given product may be sold with or without oversight from a healthcare practitioner. Proper scheduling would enable pharmacy to document, track and record the dispensation of CHPs and ensure products are being used for their intended and appropriate use.

To ensure a robust system of tracking and product oversight, Neighbourhood Pharmacies encourages Health Canada to follow its usual and well-established pathway for market authorization by implementing a standardized tracking number, such as a Drug Identification Number (DIN) or Natural Health Product Number (NPN), for CHPs.

Given their classification as health products, Health Canada should regulate CHPs by scheduling them through the National Association of Pharmacy Regulatory Authorities (NAPRA) and the Office des professions for Québec to ensure proper oversight of the health claims, and the risk and benefits, associated to a given product. The scheduling of CHPs will also have the added benefit in helping to establish a clear pathway for safe sale and use of future combination products containing cannabis that may emerge.

Pharmacies already have the necessary tools and systems to begin dispensing over the counter (OTC) cannabis products in a safe and controlled manner. Without proper oversight and scheduling, we risk making products that are designed with a medical purpose in mind, recreational.

Recommendation: Products being approved as making valid, evidence-based health claims, should be assigned a DIN or NPN, or similar (perhaps a Cannabis Health Product Number – CPN) to validate the claims made. These products can then be assessed for level of risk to determine scheduling and the level of oversight required.

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Conclusion

Nighbourhood Pharmacies remains committed to working with all levels of government to ensure that CHPs are safely dispensed in pharmacies and in a way that brings choice and access to consumers seeking the therapeutic benefits of CHPs while upholding a high degree of patient safety.