



**Neighbourhood
Pharmacy**
Association of Canada

Association canadienne
**des pharmacies
de quartier**

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Ms. Andrea Currie
Canadian Pain Task Force Secretariat
Controlled Substances and Cannabis Branch
Health Canada
Postal Locator: 0301A
Ottawa, ON, Canada

Dear Ms. Currie,

On behalf of the Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies), thank you for the opportunity to provide input to the Canadian Pain Task Force regarding the role of pharmacists in the management of pain.

Pharmacists play a critical role in the management of pain, both acute and chronic, for many Canadians. As experts in medication management, pharmacists are in an excellent position to help patients optimize pain management while at the same time providing appropriate opioid stewardship. Pharmacies are readily accessible to all Canadians with almost 11,000 locations in virtually every community across the country and they are often the most frequently seen healthcare provider.

Recently, the COVID-19 pandemic has prompted a policy revision which extends to pharmacists the right to prescribe controlled substances under the *Controlled Drugs and Substances Act* (CDSA), through a Subsection 56(1) class exemption (see [CDSA exemption 2020-03-19.pdf](#)). We applaud Health Canada for taking the steps necessary to ensure the best possible care for Canadians at a difficult time.

Cannabis is frequently ordered by medical practitioners to assist in the management of chronic pain and many patients find it to be an essential part of their therapy. However, pharmacists are currently absent from the regulatory framework for the provision of cannabis for medical purposes and this makes it much more difficult for patients to obtain comprehensive care. We believe that many patients would prefer to receive their cannabis and their medication needs from the same location and would appreciate the advice and counseling of pharmacists.

We therefore make the following recommendations for improving the ability of pharmacists to manage pain.

Recommendations

1. We recommend that the Subsection 56(1) class exemptions of March 19, 2020 be formalized and made permanent within the CDSA.
2. Amend the Cannabis Act to:
 - a. allow pharmacies and pharmacists to distribute and dispense medical cannabis.
 - b. allow pharmacists to prescribe (order) cannabis for medical purposes.
 - c. authorize pharmacies to sell hemp-based CBD products with less than 0.3% THC content to be sold as over-the-counter health products without a medical authorization.

Neighbourhood Pharmacies represents Canada's leading pharmacy organizations that 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 nearly 11,000 points of care with pharmacies conveniently located in every community across Canada, Neighbourhood Pharmacies aims to advance sustainable healthcare for all stakeholders.

Sincerely yours,



Sandra Hanna, RPh.
Chief Executive Officer
Neighbourhood Pharmacy Association of Canada