Vaccine Industry Committee
Le comité de l'industrie du vaccin

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Re: Currently, pharmacists may administer the influenza vaccine within the context of Ontario's Universal Influenza Immunization Program (UIIP). These proposed amendments to the *Pharmacy Act* Regulations support the Ministry of Health and Long-Term Care's promise to provide Ontario's patients with an improved healthcare experience. The proposed changes would allow for the administration of additional vaccinations for 13 diseases that are preventable by vaccines. The Ontario College of Pharmacy and Ontario Pharmacists Association have asked for feedback on proposed amendments to the *Pharmacy Act* Regulations that, if approved, would authorize pharmacists to administer vaccines beyond influenza vaccine.

The Vaccine Industry Committee (VIC) is composed of the leading vaccine manufacturers serving the Canadian market as well as early stage Canadian companies developing advanced vaccine technologies. The Committee works to ensure a secure supply of vaccines for Canada, advocates for equitable access to vaccines for all Canadians, and promotes the value of immunization as one of the most cost-effective health interventions available. See APPENDIX-1 for the list of members of the Vaccine Industry Committee.

The VIC welcomes the opportunity to comment on the proposed amendments to the *Pharmacy Act* Regulations that will provide Ontario patients greater access and convenience for the proposed additional vaccines to be administered by trained and registered pharmacists.

Pharmacists play an important role, as trusted healthcare professionals, and an expanding scope of practice enables broader access and convenience for Ontarians seeking vaccinations. The contribution to date, as demonstrated by influenza administration by pharmacists, has provided access to well over one million patients annually. Pharmacists are the most accessible health care professional and enabling them to administer vaccines reduces the burden on other health care providers and meets the needs of the general public by providing immunization services in a timely manner.

Regardless of whether a vaccine is schedule I or II on the NAPRA Drug Schedule (see Appendix-2), the VIC recommends that pharmacists in Ontario be authorized to administer all vaccines approved for use in Canada to patients five years of age or older.

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The VIC therefore proposes the following changes to Table 3. Categories of Vaccines:

Categories of Vaccines
BCG Vaccines
Cholera and ETEC diarrhea vaccine (oral, inactivated) (added)[1]
Haemophilus Influenza type B (Hib) vaccines
Meningococcal Vaccines
- Monovalent (Men-Conj-C)
- Quadrivalent (Men-Conj-ACWY)
- Quadrivalent (Men-PS-ACWY)
- Multicomponent (4CMenB)

Pneumococcal disease vaccines
Thyphoid disease vaccines (injectable and oral)
Combined typhoid and hepatitis A vaccines
Hepatitis A vaccines
Hepatitis B vaccines
Combined Hepatitis A and B vaccines
Herpes Zoster vaccines
Human Papillomavirus vaccines
Influenza vaccines (added)[2]
Japanese Encephalitis vaccines
Rabies Vaccines
Varicella virus vaccines
Yellow fever vaccines

1. *The oral inactivated cholera and ETEC diarrhea vaccine can be administered without a prescription (NAPRA Schedule II) when indicated to prevent enterotoxigenic E. coli (ETEC) diarrhea but requires a prescription (NAPRA schedule I) when used to prevent cholera. See Appendix-2*
2. *Pharmacists should be able to offer and administer approved influenza vaccines regardless of whether or not they are funded and included under the Universal Influenza Immunization Program (UIIP) as indicated.*

A recent report published by the C.D Howe Institute on improving vaccination policy in Canada suggests that further expanding pharmacists' scope of practice to administer vaccines could help reduce the costs and barriers that make it difficult for Canadians to access immunization services. If we want to improve overall immunization rates, evidence suggests that pharmacists have a key role to play in achieving this goal as highly trusted, professional and accessible members of Canada's health care system.

Expanding the role of pharmacists also aligns with the Ontario government's Immunization 2020 strategy to improve the uptake of recommended vaccines among Ontarians, reduced health risks related to vaccine-preventable diseases that will result in better health for all Ontarians.

The VIC also recommends that vaccine administration data generated by pharmacists be collected to complement the information compiled by Public Health authorities. Successful immunization programs should be based on a comprehensive database that tracks vaccinations as they are administered and encourages early interventions.

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According to the 2014 Annual Report for the Auditor General of Ontario, health-care providers and public health units reported $3 million in vaccines expiring before use for the 2012/13 fiscal year. The use of bar codes on vaccines by pharmacists should also be encouraged to improve vaccine inventory management and reduce wastage.

The VIC supports education and training of pharmacists to administer vaccines, and is committed to working with all stakeholders to provide greater access and convenience to more Ontarians seeking vaccinations, beyond influenza, to all vaccine preventable diseases.

Best regards,

Terry Gunter
Chair, Vaccine Industry Committee

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Allan Malek, OPA SVP Professional Affairs

Sherif Guorgui, OPA VP Pharmacy

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APPENDIX-1
Vaccine Induistry Committee Membership

Akshaya BIO
Astra Zeneca.
BIOTECanada.
Borden Ladner Gervais
Celverum
GSK
Immunovaccine
Innovative Medicines Canada
International Centre for Infectious Disease
Medicago
Merck
Plantform
Promis Neurosciences
Replikins
Sanofi Pasteur
Smart & Biggar
Takeda
Vaccine and Infectious Disease Organization–International Vaccine Centre
Valneva
VBI Vaccines

APPENDIX – 2

NAPRA – National Drug Schedule

Drug Name	Schedule	Date
Bacillus Calmette-Guerin vaccine	I	2/02
Cholera vaccine (oral, inactivated) (except oral, inactivated, when used for prophylaxis against traveller's diarrhea due to ETEC)	I	1/04
Cholera vaccine (oral, inactivated) when used for prophylaxis against traveller's diarrhea due to ETEC	II	1/04
Japanese Encephalitis vaccine	I	2/02
Haemophilus influenza type B vaccine	II	12/98
Hepatitis A vaccine	I	2/02
Hepatitis B adult vaccine	I	2/02
Hepatitis B pediatric vaccine	II	12/98
Influenza vaccine	II	12/98
Lyme disease vaccine	I	2/02
Measles vaccine	II	12/98
Melanoma therapeutic vaccine	I	3/01
Meningococcus vaccine	II	3/01
Mumps vaccine	II	12/98
Pertussis vaccine	II	12/98
Pneumococcal 7-valent conjugate vaccine	II	1/04
Pneumococcal polysaccharide vaccines	II	2/02
Poliomyelitis vaccine	II	12/98
Rabies vaccine	I	2/02
Rubella vaccine	II	12/98
Typhoid vaccines/salmonella typhi vaccines	I	2/02
Vaccines (except for – those which are part of a routine immunization program in most/all provinces and territories; Diphtheria toxoid, Tetanus toxoid, Pertussis, Poliomyelitis, Haemophilus influenza type B, Measles, Mumps, Pneumococcus, Rubella, Hepatitis B pediatric, Influenza, cholera vaccine (oral, inactivated) when used for prophylaxis against Traveller's Diarrhea due to ETEC; and those requiring special enhanced public access due to disease outbreaks: meningococcus)	I	2/02
Vaccines which are part of a routine immunization program in most/all provinces and territories; Diphtheria toxoid, Tetanus toxoid, Pertussis, Poliomyelitis, Haemophilus influenza type B, Measles, Mumps, Pneumococcus, Rubella, Hepatitis B pediatric, Influenza, cholera vaccine (oral, inactivated) when used for prophylaxis against Traveller's Diarrhea due to ETEC; and those requiring special enhanced public access due to disease outbreaks: meningococcus	II	2/02
Varicella vaccine (chicken pox)	I	2/02
Yellow fever vaccine	I	2/02

Source: http://napra.ca/pages/Schedules/Search.aspx Accessed May 18th, 2016