



COUNCIL BRIEFING NOTE
MEETING DATE: JUNE 2018

FOR DECISION	X	FOR INFORMATION
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INITIATED BY: Cannabis Task Force

TOPIC: Ontario College of Pharmacists' Position on Cannabis

ISSUE: The Cannabis Task Force is recommending that the College put forth a position statement regarding the dispensing of cannabis for medical purposes in pharmacies.

BACKGROUND: In July 2017 the National Association of Pharmacy Regulatory Authorities (NAPRA) adopted the position that pharmacy practitioners must not be involved in the dispensing of cannabis for non-medical purposes. NAPRA recognized that members will continue to discuss the regulatory safeguards necessary for pharmacy professionals to dispense cannabis for medical purposes. The Council of the Ontario College of Pharmacists subsequently endorsed [NAPRA's position](#).

In September 2017, Council supported a proposal by the Executive Committee to create a Task Force that would consider cannabis and the changing landscape of access to cannabis for recreational purposes and its impact on patient care in Ontario. The Task Force members met four times between December 2017 and April 2018 through a combination of in-person and teleconference meetings. During these meetings, they created a multi-pronged strategy that simultaneously addresses relevant areas of practice and prepares the College and pharmacy professionals to address evolving cannabis-related issues, while considering how to best serve and protect patients and Ontarians. Please see the College's Cannabis Strategy for Pharmacy for details (Item 4.3).

Throughout the creation of the Strategy, the Task Force expressed support for the development of a College position statement building on the existing NAPRA position and further defining an appropriate regulatory opinion within the provincial context.

The distinction between dispensing and distribution should be noted. Dispensing is the provision of drugs or medicines as set out on a lawful prescription or order, and occurs in the context of a pharmacist and patient relationship. Distribution is the supplying of goods, either to a person, commonly referred to as selling, or between business entities or institutions.

CONSIDERATIONS: There are a number of key considerations relevant to the development of a regulatory position related to the dispensing of cannabis for medical purposes, namely:

- Cannabis will be readily available across the province in government-run stores by the end of this year. Some products used for medical purposes are the same as those used for

recreational purposes, presenting an opportunity for patients to acquire cannabis with the intent for medical use without the intervention of a health professional;

- It is currently illegal to dispense cannabis within pharmacies and the legislative framework for cannabis for medical purposes is set to remain unchanged as Health Canada has indicated this will not be examined for approximately five years. It is, therefore, important for the College to consider how it can continue to be a responsive regulator in the context of a rapidly evolving environment as it relates to legal access to/dispensing of cannabis for medical use;
- The College makes patient safety the primary consideration related to the role of pharmacy in cannabis for medical purposes and, therefore, promotes open and informed conversations between patients and healthcare professionals. There may be benefits to pharmacist involvement with cannabis, including facilitating appropriate use by patients and identifying potential harm prevention strategies;
- While some pharmacological cannabinoids already possess a Drug Identification Number (DIN), herbal cannabis has not gone through Health Canada's drug review process and is consequently lacking an assigned DIN;
- There are a number of pharmaceutical companies that have established relationships with producers to research/develop cannabis products to the established Health Canada requirements for a DIN
- The Task Force sees the value and importance of DIN acquisition for cannabis. However, it acknowledges the beneficial elements of using cannabis for medical purposes and that it is already being consumed by patients.¹ For these reasons, along with the lengthy time it takes to acquire a DIN, the Task Force believes the absence of a DIN should not impact the authority to dispense cannabis;
- NAPRA's position statement stated that "smoked cannabis products should be subject to the same provincial or territorial legislation as smoked tobacco products." Keeping in line with NAPRA's position, pharmacists would be expected to treat smoked cannabis products akin to smoked tobacco, and assist in finding alternative routes of administration.
- The provincial pharmacy regulators that have made position statements (Appendix A), have shown a variation in stances towards distribution, dispensing and DINs. These positions reflect their own provincial context, reinforcing the need for OCP to have a position of its own that satisfies our public-protection mandate and that fits within our own provincial context;
- Irrespective of whether cannabis for medical purposes is dispensed in pharmacies, pharmacists have a role to play in safe patient use of cannabis. The Cannabis Strategy will continue to address these needs through various levers, such as requiring that all pharmacists complete cannabis education;

¹ National Academies of Sciences, Engineering, and Medicine; Health and Medicine Division; Board on Population Health and Public Health Practice; Committee on the Health Effects of Marijuana: An Evidence Review and Research Agenda.

Washington (DC): National Academies Press (US); 2017 Jan 12.

- The College recognizes that cannabis is an evolving matter with areas of relative uncertainty. The College may update its position as the legislative and regulatory framework in Canada and Ontario related to access and distribution of cannabis evolves and becomes more defined;
- NAPRA continues to review the role of pharmacy in the distribution of cannabis for medical use and is expected to address topics such as promotion and advertising of cannabis and conflict of interest related to the recommendation and referral of individuals for cannabis for medical use; and
- As models of distribution of cannabis for medical use are developed in the province and as pharmacy professionals become more aware of access options for patients, the College expects all members to act in accordance with established laws and regulations, standards of practice, and Code of Ethics.

RECOMMENDATION: In light of the above considerations related to the access to and dispensing of cannabis for medical use, the College is proposing the following position be adopted by Council:

With the recognition that the dispensing of cannabis within pharmacy is currently not permitted within the existing legal framework, the College:

- *would not oppose any federal or provincial legislation that would permit the dispensing of non-smoked forms of cannabis within pharmacies;*
- *would not oppose legal dispensing within pharmacies regardless of whether cannabis is approved as a drug by Health Canada or whether it receives an assigned Drug Identification Number; and*
- *strongly opposes the distribution by pharmacies of any smoked forms of cannabis for any purpose.*

NEXT STEPS: If approved, the statement will be posted publicly in conjunction with the College's Cannabis Strategy.

EXECUTIVE COMMITTEE RECOMMENDATION AND COMMENTS (if any):

Appendix A

Cannabis Position by Province

Provinces	Position
<u>Alberta</u>	“Until such time that federal legislation, policies, and procedures are amended to recognize and accommodate cannabis products as licensed drug products (i.e.: assigned a DIN), they must not be ordered, stored, compounded, dispensed, administered, or sold from a licensed pharmacy.”
<u>British Columbia</u>	Their position is NAPRA’s.
<u>Manitoba</u>	Their position is NAPRA’s.
<u>New Brunswick</u>	“Currently available information does not support pharmacy distribution of cannabis. For pharmacy distribution, cannabis for medical purposes requires a full Health Canada drug approval process including review of efficacy, safety, and product quality.”
<u>Newfoundland and Labrador</u>	No position stated; they have just provided links to the status of cannabis and NAPRA’s statement.
<u>Nova Scotia</u>	<p>Their draft position statement is currently being approved.</p> <p>NSCP will conditionally support cannabis compounding if certain criteria are met. NSCP has also drafted the following statement:</p> <p>“Pharmacists may not distribute cannabis products that have not been approved as a drug by Health Canada (DIN or NPN), unless as part of a rigorously-designed peer-reviewed study that has been approved by a Research Ethics Board (REB).”</p>
<u>Prince Edward Island</u>	No position or information on their website.
<u>Quebec</u>	For some conditions, cannabis for medical purposes should be entrusted to pharmacists to ensure patients receive care and service from a regulated professional. Pharmacists should not be involved in the production or sale of cannabis for non-medical purposes.
<u>Saskatchewan</u>	Their position is NAPRA’s.