



Re: [Public Consultation on Proposed Amendments to the Standards of Operation for Pharmacies – OCP website](#) ; [Standards-of-Operation-for-Pharmacies_proposed-changes-and-rationale.pdf](#); [Standards-of-Operation-for-Pharmacies_revisions-for-consultation.pdf](#)

Ontario College of Pharmacists

Re: Public Consultation on Proposed Amendments to the Standards of Operation for Pharmacies

Dear Members of Council and College Staff,

The Canadian Association of Pharmacy for the Environment (CAPhE)¹ appreciates the opportunity to provide feedback on the proposed amendments to the Standards of Operation for Pharmacies.

CAPhE supports the College's efforts to modernize pharmacy operations in response to evolving models of care, expanded pharmacist scope of practice, and the increasing complexity of pharmacy service delivery. We acknowledge that the proposed amendments focus on access to patient information, practice environments that support safe care, and operational requirements that enable pharmacists and pharmacy technicians to provide high-quality patient-centred care.

While CAPhE's mandate includes environmental sustainability in pharmacy, we are providing feedback primarily through the lens of operational resilience, continuity of medication access, and patient safety. Increasingly, pharmacies are required to maintain services during disruptions caused by extreme weather events, infrastructure failures, and other emergencies. As pharmacists assume greater responsibility for clinical care, ensuring continuity of pharmacy operations becomes increasingly important.^{1,3}

1. Access to Patient Information

CAPhE supports the proposed amendments recognizing the importance of timely access to patient information to support patient care and expanded pharmacy services.

We encourage the College to consider the role of operational disruptions in limiting access to patient information. Extreme weather events, prolonged power outages, internet failures, cyber incidents, and other emergencies may impair access to pharmacy management systems, electronic medical records, and communication platforms.^{1,2}

CAPhE recommends pharmacies have plans in place which consider the impacts of:¹⁻⁵

- Business continuity procedures for temporary loss of access to electronic systems.
- Secure backup processes for critical patient information and prescription records.
- Emergency communication procedures with patients, prescribers, and other healthcare providers.
- Periodic testing of downtime and recovery procedures.

As pharmacists increasingly prescribe, monitor, and manage therapies, continuity of access to patient information becomes a critical component of patient safety during emergencies.

2. Physical Space and Practice Environment

CAPhE supports standards that ensure pharmacies provide safe environments for patient care and medication management. We encourage consideration of environmental conditions that may affect medication quality, inventory integrity, and pharmacy operations. Heat waves, power interruptions, wildfire smoke events, and other climate-related hazards are becoming increasingly common across Canada and may directly impact medication storage and pharmacy functionality.^{1,3}

CAPhE recommends the College consider developing standards which address the following:¹⁻⁵

- Procedures to maintain appropriate medication storage conditions during extreme heat and power disruptions.
- Contingency planning for refrigeration-dependent medications, including vaccines, insulin, biologics, and specialty therapies.
- Emergency response procedures for temperature excursions.
- Consideration of environmental risks that may affect medication quality and patient safety.

These measures support both medication integrity and continuity of patient care.

3. Workflow, Staffing, and Expanded Scope of Practice

CAPhE strongly supports standards that enable pharmacists and pharmacy technicians to practise to their full knowledge and improve access to healthcare services. As pharmacy teams assume greater responsibility for the assessment, prescribing, monitoring, and ongoing management of patients, pharmacy continuity during emergencies becomes increasingly important. Community pharmacies often remain one of the most accessible points of healthcare during disasters and public emergencies.

CAPhE recommends consideration of:¹⁻⁵

- Emergency preparedness and continuity-of-operations planning.
- Procedures to maintain access to essential pharmacy services during disruptions.
- Staffing contingency plans.
- Communication protocols for service interruptions.
- Evacuation, relocation, and recovery procedures where appropriate.
- Processes to support continuity of medication access for patients during emergencies.

These considerations may be particularly important for vulnerable populations, individuals with chronic diseases, and patients reliant on time-sensitive or temperature-sensitive therapies.

For Consideration: Operational Resilience and Continuity of Medication Access

CAPhE encourages the College to recognize operational resilience as an emerging component of safe pharmacy practice. Recent experiences across Canada have demonstrated that wildfires, flooding, severe storms, heat events, and prolonged infrastructure disruptions can affect pharmacy operations and medication access. CAPhE's work in pharmacy climate resilience has identified examples of temporary pharmacy closures and service interruptions associated with extreme weather events, highlighting the importance of preparedness planning and operational continuity. While not all resilience measures need to be explicitly incorporated into the Standards of Operation at this time, CAPhE believes future guidance and standards development could benefit from consideration of:¹⁻⁵

- Pharmacy emergency preparedness.
- Business continuity planning.
- Climate and disaster resilience.
- Continuity of medication access during emergencies.
- Protection of medication quality during environmental disruptions.

For consideration: Environmental Sustainability

CAPhE also supports ongoing efforts to improve the environmental sustainability of pharmacy operations where such measures align with patient safety, quality improvement, and operational efficiency^{1,4}. Opportunities may include reducing avoidable medication waste, supporting environmentally responsible disposal practices, and identifying efficiencies that benefit both patients and the healthcare system. Various Colleges of Pharmacies are now considering the incorporation of environmental sustainability into Code of Ethics⁶ and more information about the incorporation of environmental sustainability in pharmacy practice can be reviewed via the Canadian Association of Pharmacy for the Environment work with groups such as CASCADES Canada⁴ and the Canadian Coalition of Green Healthcare.

Conclusion

CAPhE supports the direction of the proposed amendments and appreciates the College's commitment to ensuring pharmacy standards continue to evolve alongside changing healthcare needs. We believe that operational resilience, continuity of medication access, and preparedness for foreseeable disruptions are increasingly relevant considerations for modern pharmacy practice and look forward to future opportunities to contribute to these discussions.

Thank you for the opportunity to provide feedback.

Sincerely,

Canadian Association of Pharmacy for the Environment (CAPhE)

References:

1. Canadian Association of Pharmacy for the Environment (CAPhE). (2025). Home | Canadian Association of Pharmacy for the environment - CAPhE. Mysite.
<http://www.caphe.ca>
2. Institute of Safe Medication Practices (2022, August). Emergency preparedness: Be ready for unanticipated EHR downtime. ISMP Medication Safety Alert.
<https://www.ismp.org/sites/default/files/newsletter-issues/20220825.pdf>
3. Watson, K. E. (2022). Disaster and emergency pharmacy. Taylor & Francis.
4. CASCADES Canada. (2026). CASCADES - climate resilient, low carbon sustainable pharmacy playbook - page 1. Publitas.Com.
<https://view.publitas.com/5231e51e-4654-42c2-accd-b722e21f3093/pharmacy-playbook/page/1>
5. Sajwani, S & Metz, C (2025). Climate disasters are shutting down pharmacies — Are we ready for what comes next? In Canada's National Observer.
<https://www.nationalobserver.com/2025/10/23/opinion/canada-pharmacy-disaster-planning>
6. College of Pharmacy of Newfoundland and Labrador. (2024, November 20). Code of Ethics |. <https://cpnl.ca/professional-practice/practice-framework/code-of-ethics/>
7. Rutherford, G. (2026). Pharmacy students prepare for the worst with disaster scenario. Ualberta.Ca.
<https://www.ualberta.ca/en/folio/2026/04/pharmacy-students-prepare-for-the-worst-with-disaster-scenario.html>