

Supplemental Guidance

Providing Pharmacy Services for Animals Policy

Supplemental Guidance provides additional information to support registrants with meeting the expectations of the accompanying policy. It is intended to assist with policy implementation and not to be applied in isolation of the policy. Supplemental guidance is updated as needed to reflect current practice.

Last updated:

Introduction

The provision of pharmacy services for animals is not a new practice; pharmacy professionals have a long history of dispensing and compounding veterinary prescriptions in accordance with the [Drug and Pharmacies Regulation Act](#), 1990 (DPRA). In the absence of a specific policy, registrants have relied upon their professional judgment and the framework for practice created by the Standards of Practice and Code of Ethics when providing services for animals. The Providing Pharmacy Services for Animals Policy clarifies the scope of practice and authorized acts for pharmacy and codifies expectations specifically relevant to the provision of services for animals.

Principles

1. The provision of health care to animals is governed by the *Veterinary Professionals Act, 2024*.
2. A prescription prepared for an animal or group of animals is fundamentally similar whether compounded and/or dispensed by a pharmacy or veterinary professional, supporting the client's right to choose their service provider without compromising safety.
3. Pharmacy professionals engage in consultation, collaboration and effective communication with veterinary professionals to facilitate quality care in the best interest of animals.

Relevant legislation

Why can't I provide services for animals involving all controlled acts for pharmacy professionals under the *Pharmacy Act*?

Dispensing, selling and compounding a drug are the only permitted pharmacy services for animals because they have a specific exemption under the *Veterinary Professionals Act*. These are named as "authorized activities" in the practice of veterinary medicine, which are otherwise restricted to licensed veterinary professionals.

Other pharmacy services within the scope of practice of pharmacy professionals under the *Pharmacy Act* (such as prescribing a drug, administering a substance by inhalation or injection, and monitoring and managing medication therapy) are not permitted for animals as they are not articulated as authorized for pharmacy professionals under the *Veterinary Professionals Act*. As with other self-regulated health profession statutes set out by the *Regulated Health Professionals Act* (RHPA), the *Pharmacy Act* governs the provision of health care to humans.

40 *Selling or dispensing to clients*

41 **Is specialized training or education required to provide services for animals?**

42 The College does not require a particular course or certification to dispense, compound or sell drugs for
43 animals. As regulated professionals, pharmacists and pharmacy technicians must only practice when
44 they possess the knowledge and skill to do so safely. Pharmacy professionals must recognize there
45 are inherent differences in the physiology and anatomy of animals compared to humans, resulting in
46 species-specific therapeutic, pharmacologic and toxicologic considerations that present a real risk of
47 harm when these services are provided for animals. For animals that may enter the food chain, drug
48 residues also present a potential risk to humans.

49 Before selling or dispensing for animals, registrants must self-assess their competency, identify
50 knowledge gaps and seek out suitable learning resources. Individual learning needs will vary
51 depending on factors such as previous education, past experience, practice environment, etc. In
52 addition to the [Continuing Education links](#) available on the College's website, other sources of
53 professional development programs include veterinary associations and educational institutions, some
54 of which may be in other jurisdictions.

55 Pharmacy professionals have an ethical obligation to recognize their limitations and when necessary,
56 refer a client to another pharmacy professional or veterinarian.

57 **What veterinary-related references are recommended by the College?**

58 It is the responsibility of the Designated Manager to select the appropriate [Required References for the](#)
59 [Pharmacy Library](#), to support the specific services provided. Registrants should evaluate their needs
60 and identify suitable reference materials, ideally in collaboration with colleagues and management.

61 Sources of evidence-based references include reputable publishers of professional textbooks and
62 journals (e.g., Wiley, Elsevier). Examples include:

- 63 • Plumb's Veterinary Drug Handbook
- 64 • Merck Veterinary Manual
- 65 • Saunders Handbook of Veterinary Drugs
- 66 • Compendium of Veterinary Products
- 67 • Applied Pharmacology for Veterinary Technicians
- 68 • Veterinary Pharmacology and Therapeutics

69 Other helpful resources may be available from veterinary medicine associations. If using a non-
70 Canadian resource, remember to refer to Health Canada's Prescription Drug List and Drug Product
71 Database to verify a drug is approved for use in Canada.

72 **What products used in veterinary medicine can a pharmacy sell?**

73 Products used in veterinary practice are regulated under different pieces of legislation and various
74 government agencies. It is important for Designated Managers to perform due diligence, seeking legal
75 advice as necessary, to ensure regulatory compliance before offering products for sale. Although the
76 College is not responsible for compliance and enforcement of these regulations, pharmacy
77 professionals remain accountable to the College if they are found to be contravening applicable
78 legislation.

79 For example, federally:

- Veterinary drugs
 - Regulated by the *Food and Drugs Act and Regulations*
 - Overseen by the Veterinary Drug Directorate of Health Canada
 - Have a Drug Identification Number (DIN) and are listed in the [Drug Product Database](#)
 - There is a separate Prescription Drug List for drugs for veterinary use
- Notified Veterinary Health Products
 - Regulated by the *Food and Drugs Act and Regulations*
 - Overseen by the Veterinary Drug Directorate of Health Canada
 - Do not have a DIN and considered non-drug veterinary products
- Veterinary biologics
 - Regulated by the *Health of Animals Act and Regulations*
 - Overseen by the Canadian Centre for Veterinary Biologics of the Canadian Food Inspection Agency
- Pest Control Products
 - Registered under the *Pest Control Products Act and Regulations*
 - Products have a Pest Control Product (PCP) number
 - Overseen by the Pest Management Regulatory Agency of Health Canada
- Livestock Feeds
 - Registered under the *Feeds Act and Regulations*
 - Overseen by the Animal Feed and Veterinary Biologics Division of the Canadian Food Inspection Agency

Refer to Health Canada's [Classification of products for use in animals](#) and [Fact Sheet: Accessing and Selling Prescription Veterinary Drugs](#) for more information. Health Canada also requires and issues establishment licenses for importation of [active pharmaceutical ingredients for veterinary use](#).

Corresponding provincial examples include:

- Veterinary drugs
 - Regulated by the *Drug and Pharmacies Regulation Act, 1990* and its regulations
 - Overseen by the Ministry of Health
- Pesticides
 - Regulated by the *Pesticides Act, 1990*
 - Overseen Minister of the Environment, Conservation and Parks
- Livestock medicine
 - Regulated by the *Animal Health Act, 2009*
 - Overseen by the Ministry of Agriculture, Food and Agribusiness

It is the responsibility of a Designated Manager to do their due diligence when procuring products to ensure they acquire any licenses that may be required.

What are my responsibilities in the case of an adverse drug reaction?

While a pharmacy professional can report an adverse reaction, when an animal patient is involved, it is essential for the pharmacist to remind the client to [report any adverse drug reaction](#)¹ to the prescribing veterinarian. It is a College of Veterinarians of Ontario Professional Practice Standard when prescribing a drug for the veterinarian to be readily available to manage adverse reactions.

121 **Do I need to record medication incidents and near misses involving animal prescriptions for the**
122 **Assurance and Improvement in Medication Safety (AIMS) Program?**

123 Yes, the Supplemental Standard of Practice: Mandatory Standardized AIMS program in Ontario
124 Pharmacies applies when providing services for animals.

125 **Do I record the client's identification when dispensing a monitored drug for an animal?**

126 No. Data submission to the Narcotic Monitoring System (NMS) is not required by the [Narcotics Safety](#)
127 [and Awareness Act, 2010](#) when dispensing prescriptions from veterinarians.

128 *Selling to veterinarians*

129 **What are the requirements for selling controlled substances to a veterinarian to use in their**
130 **practice?**

131 Federal regulations allow a pharmacist to sell or provide to a veterinarian:

- 132 • *A narcotic or controlled drug*, upon receipt of a signed and dated written order, where the
133 quantity is specified as being required for emergency purposes.
- 134 • *A benzodiazepine or other targeted substance* upon receipt of an order that specifies the name
135 and quantity.
 - 136 ○ If the order is verbal, the pharmacist must create a hard copy and record the following:
 - 137 ▪ Name and address of the veterinarian
 - 138 ▪ The date of the order
 - 139 ▪ The name, quantity and strength of the targeted substance
 - 140 ▪ If the order was placed on behalf of a veterinary facility, the name and address of
141 the establishment.

142 Pharmacists should also ensure that there are no restrictions or conditions on the veterinarian's license.
143 For more information refer to the [Controlled Substances: Orders, Purchases and Sales \(Federal\) Fact](#)
144 [Sheet](#) and [Controlled Substances: Purchase & Sales Record Requirements \(Federal\) Fact Sheet](#).

145 **What are my responsibilities when providing drugs or compounded preparations for office use?**

146 Although the veterinarian is responsible for their decision and actions, a pharmacy professional cannot
147 absolve themselves of their overarching professional and ethical obligations to the public. The Code of
148 Ethics expects that registrants "will not provide pharmacy services, care or products where there is no
149 potential benefit to the patient" and that their trust in the care provided by the veterinary professional
150 must be balanced with critical evaluation.

151 As such, it is reasonable to expect that you assess the need for, and intended purpose of, orders for
152 office use. For instance, why is the veterinary professional procuring a drug from a pharmacy instead
153 of a licensed wholesaler? One reason could be that the minimum order quantity is more than the office
154 would use before the drug's expiry. This is especially true for compounded preparations, which
155 inherently pose an incremental risk to the patient compared to a manufactured product.

156 Pharmacists should take the necessary steps to be satisfied that the requested preparation is going to
157 be used in a manner that is safe and therapeutically appropriate for its intended purpose. These steps
158 might include making inquiries with the prescriber, deliberation with colleagues, sourcing journal
159 articles, checking for recalls and advisories, etc.

160 **How can I determine whether the amount and frequency for office use are appropriate?**

161 Pharmacy professionals must use their professional judgment along with objective evidence (e.g.,
162 information on typical dispensing volume from the veterinarian) to determine the amount that can be
163 sold to a veterinarian to use in their practice. For drugs that are used regularly during a shortage,
164 determining the appropriate quantity might account for the anticipated length of the shortage and the
165 average volume dispensed by the veterinarian in a certain timeframe.

166 For bulk compounded preparations, dispensing volume and beyond-use date are important to consider.
167 Confirming that the preparation is for use only within a veterinarian–client–patient relationship is also
168 essential. To maximize the BUD for the client and reduce the chance of temperature excursions that
169 could affect product quality, pharmacy professionals may wish to discuss with the veterinary
170 professional the feasibility of dispensing a patient-specific prescription from the pharmacy. These could
171 be made as required or the pharmacy may prepare suitable amounts to have on hand in anticipation of
172 the prescription, to minimize the delay in the client receiving the medication.

173 **Additional resources**

- 174 • Saskatchewan College of Pharmacy Professionals - [Guidance for Pharmacists on Veterinary](#)
175 [Use Medications](#)
176 • Alberta College of Pharmacy - [Providing pharmacy care for animals](#)
177 • [The Canadian Veterinary Journal](#)

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Revision History

Version #	Date	Action
1.00	Month Day, YYYY	