

Ontario College of Pharmacists
483 Huron Street
Toronto, ON M5R 2R4



Re: Seeking Feedback on Expanded Scope Regulatory Amendments

August 8th, 2023

Dear Ontario College of Pharmacists,

Life Sciences Ontario (LSO) is pleased to provide our response regarding proposed regulatory amendments that will allow pharmacists and pharmacy technicians to administer additional vaccines, including the RSV vaccine, and treatment options for COVID-19 and influenza. For your consideration, please see below our comments on the proposed regulatory amendments:

Comment 1: The proposed amendments will improve patient access and health system sustainability in Ontario.

Life Sciences Ontario is fully supportive of the proposed regulatory amendments that will expand the number of vaccines, including the RSV vaccine, and treatments for COVID-19 and influenza that pharmacists and pharmacy technicians in Ontario will be permitted to administer. The proposed regulatory amendments will improve patient access and ensure that Ontarians without a family doctor will be able to access life-saving vaccines and treatments. More specifically, these measures will improve patient access for individuals living in rural and northern communities. At the same time, the proposed amendments will strengthen the capacity of Ontario's health system, which is continuing to face effects exacerbated by the COVID-19 pandemic such as a shortage of healthcare workers.¹ The proposed regulatory amendments are also aligned with provincial legislation passed earlier this year which expanded care options at pharmacies.² As such, we wish to reiterate our support for the proposed regulatory amendments as they will improve patient access and healthcare capacity in Ontario.

Comment 2: The proposed amendments demonstrate the significance of adoption of innovation into our health system and are necessary steps that will benefit Ontarians in the long-term.

As stated above, LSO is highly supportive of the proposed regulatory amendments. However, we would like to provide the following suggestions for framing the long-term significance of the

¹ Financial Accountability Office of Ontario, *Ontario Health Sector: Spending Plan Review, 2023*, <https://www.fao-on.org/web/default/files/publications/FA2209%20Health%20Sector%20Spending%20Plan%20Review/Ontario%20Health%20Sector%20Spending%20Plan%20Review-EN.pdf>

² Ontario Ministry of Health, *Your Health: A Plan for Connected and Convenient Care*, 3 February 2023, <https://www.ontario.ca/page/your-health-plan-connected-and-convenient-care#section-6>

proposed amendments. First, we believe that the proposed amendments should be viewed with a recognition of the overall value that innovation can add to our health system in the long-term. Health innovations, including new and innovative vaccines and treatments, are crucial to building a resilient and sustainable health system for Ontario. The COVID-19 vaccine and its subsequent public rollout—which pharmacists in Ontario played a crucial role in delivering—demonstrate the ways in which health innovations can save lives and ease the burden placed on our health system.

The emergence of a vaccine for RSV is another example of how early adoption of innovation can benefit patients and our health system. Therefore, as you present these proposed regulatory amendments to the Ministry of Health, we recommend that you consider the role that the adoption of health innovations—including new treatments and vaccines—can play in improving patient access and building health system sustainability.

Similarly, we believe that the proposed amendments should be viewed beyond the urgency created by last year’s respiratory season, which saw a “triple threat” of COVID-19, influenza, and RSV. Although last year’s respiratory season was unprecedented, it is possible that this year’s respiratory season could return to “normal,” which might imply a less urgent need for the proposed amendments. The burden of respiratory illnesses, including RSV, on Ontarians and our health system is still high and thus, we feel it is important to emphasize the necessity of these proposed amendments regardless of the severity of the upcoming respiratory season. Overall, we believe that the proposed amendments are an important measure for strengthening Ontario’s health system and building a robust and resilient life sciences sector in Ontario.

Thank you for the opportunity to provide our feedback on these proposed regulatory amendments. Please do not hesitate to contact us if you have any questions or comments regarding our submission.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Field".

Dr. Jason Field
President and CEO
Life Sciences Ontario