



CANADIAN
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PHARMACIENS
DU CANADA

February 20, 2019

Strategic Policy Directorate
Cannabis Legalization and Regulation Branch
Health Canada
Ottawa, Ontario
K1A 0K9

By email to: cannabis@canada.ca

RE: CONSULTATION: STRICT REGULATION OF EDIBLE CANNABIS, EXTRACTS AND TOPICALS

On behalf of the Canadian Pharmacists Association (CPhA) we would like to thank you for the opportunity to participate in Health Canada's consultation on the regulation of edible cannabis, extracts and topicals. CPhA is the national voice of Canada's 42,000 pharmacists, who are trusted health care providers and medication experts. They are an integral part of a patient's circle of care and provide education and counselling on a number of health and drug related topics, including cannabis.

Above all else, pharmacists have a duty to keep Canadians safe and ensure that their drug therapy leads to optimal outcomes. Whether Canadians are using cannabis recreationally or for medical purposes, pharmacists want to ensure that patients are well-educated about the risks and consuming cannabis safely. A recent CPhA survey of 562 pharmacists found that patients ask for guidance from pharmacists on a number of cannabis topics, most often related to drug interactions, dosing and indications for cannabis use.

Building on the regulatory framework already in place through the *Cannabis Regulations*, we are generally pleased with the government's proposed amendments to regulate cannabis edibles, extracts and topicals for the recreational market. We believe that the strict requirements being proposed around THC limits, ingredients, packaging, clear labelling, and manufacturing controls will allow the government to achieve its goals of protecting public health, children and young persons, providing for legal quality-controlled production and enhancing public awareness of the health risks of cannabis use, among others. Nonetheless, we believe that medical cannabis users have unique needs that differ from the recreational stream of product options contained within these regulations and, as such, consideration should be given to a separate regulatory stream for medical cannabis products. We are also disappointed that medical cannabis continues to be supplied to patients without the proper oversight from pharmacists, and we believe that more must be done to ensure the public is educated about the risks of cannabis edibles and potential interactions between cannabis and other medications.



Medical cannabis stream

Medical cannabis patients have distinct needs that differ from those of recreational cannabis users. Patients who obtain medical cannabis may require strains and forms to alleviate symptoms and minimize intoxication, like those available through CBD, or they may require a combination of therapeutic ingredients and other agents. While we are pleased that medical cannabis users will have a greater range of therapeutic options available to them with the regulation of cannabis edibles, extracts and topicals, we are concerned that their therapeutic options may also be limited by a single regulatory stream for these products.

CPhA recommends that Health Canada consider a separate regulatory stream for cannabis edibles, extracts and topicals intended for medical use. While clinical research on the therapeutic benefits of cannabis use is still in its infancy, a growing number of studies are taking place internationally with promising results. It would be premature to assume that the single stream of regulations proposed for edible, extracts and topics, which target the recreational market predominantly, could cover the spectrum of possibilities that may soon be discovered for medical cannabis therapy. A distinct regulatory stream for medical cannabis edibles, extracts and topicals would allow for variability in therapeutic offerings, including distinct specifications for product composition, ingredients, THC and CBD limits, as well as packaging and labelling.

CBD in pharmacies

CPhA continues to advocate for medical cannabis management and dispensing by pharmacists, which will soon be available in the form of edibles, extracts and topicals. Pharmacies provide secure and safe access to medications while pharmacists have the necessary expertise to mitigate the potential risks associated with medical cannabis, including harmful drug interactions, contraindications, and potential addictive behaviour. We believe that with the imminent legalization and regulation of cannabis edibles, extracts and topicals, that this is an opportune moment for the government to reconsider how it plans to regulate CBD products. Given that CBD does not produce a high or intoxication, there is little reason that products containing only CBD (without THC) should not be available to patients alongside other commonly used medications within pharmacies.

CPhA recently conducted a survey of over 800 medical cannabis users and found that over 60% of people treating medical conditions with cannabis do not currently use a medical document to obtain their cannabis, which they access through the recreational or illegal market. This represents an alarming number of medical cannabis users who are self-medicating and may not be receiving guidance from medical professionals. The medical cannabis users surveyed also indicated that pharmacists would be an ideal health care provider to consult about cannabis on an ongoing basis, second only to physicians.

Canadians who require cannabis for medical purposes should be able to access the products they need in person through pharmacies that are widely accessible across Canada. This would leverage the strong pre-existing relationships patients have with their health care providers as well as the established pharmacy distribution



system proven to protect patient and public safety. This should begin now with CBD products, which do not have the same intoxicating effects as THC products.

CPhA recommends that the government take a first step in allowing pharmacists to help patients manage their cannabis therapy by enabling the purchase of CBD products through pharmacies. Associated legislation and regulations would put in place strict scheduling, dispensing and storage requirements for CBD products, and they would ultimately enable pharmacists to offer better professional support and care to medical cannabis patients, many of whom currently seek their products through recreational or illegal channels and have no support from a healthcare professional.

Educating the public about the risks associated with cannabis edibles

Recent reports in the media have highlighted the significant risks of cannabis edibles, ranging from the accidental ingestion of a THC chocolate bar by a child causing seizure, to a cardiac event in a 70-year-old man after ingesting a cannabis lollipop.^{1,2} CPhA is pleased that the government will now begin to strictly regulate edible cannabis products, including plain packaging, clear labelling and child-resistant packaging requirements, and impose a limit of 10 milligrams of THC per discrete unit and per package. We believe these measures will greatly reduce the risks of accidental ingestion by children and overconsumption by cannabis-naïve patients.

Despite these measures, we believe that public education must be improved to better ensure that patients understand the risks associated with cannabis, and edibles specifically. As edibles can take up to two hours to take effect, even with the new proposed limits on THC content patients may consume a dangerous amount of edibles (number of units) in the belief that they need more for the product to begin working. Further, as there is a growing interest among senior populations in cannabis edibles for pain relief and a belief that cannabis could reduce reliance on prescription medications, seniors may be especially susceptible to overconsumption. The use of edibles to treat pain and other symptoms also reinforces the need for pharmacists to provide advice and counseling to patients as part of the dispensing and managing of medical cannabis.

CPhA recommends that Health Canada do more to educate the public about the risks associated with cannabis edibles, with special consideration given to seniors. The public should be informed of potential side effects of cannabis ranging from sedation, hypotension, anxiety and paranoia, and warned about the risks of overconsumption and of potential drug interactions. Education on the risks of potential drug interactions is especially important as 60% of medical cannabis users surveyed by CPhA are concurrently taking other medications, yet only 24% believe that drug interactions are a risk when combining cannabis and prescription medications. Methods of educating the public could include a mandatory patient handout with the purchase of cannabis edibles through recreational suppliers among other important education strategies that target the senior population.



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We appreciate the opportunity to comment on Health Canada's proposed regulations for edible cannabis, cannabis extracts, and cannabis topicals. CPhA will continue to advocate for a separate stream of regulations and therapeutic offerings for medical cannabis patients as well as improved patient safety and access to medical cannabis through pharmacist dispensing and management. We also strongly recommend that the regulation and legalization of cannabis edibles be coupled with an extensive public educational campaign, with a special focus on seniors, to improve the public's understanding of the risks associated with cannabis overconsumption and potential drug interactions. We look forward to working with Health Canada and other health care professional and industry partners on the topic of cannabis to improve patient care and protect the health and safety of Canadians.

Sincerely,

Glen Doucet

Interim Chief Executive Officer & Vice President, Public & Professional Affairs

¹ Flanagan, R. 'Cannabis chocolate bar sends two children to hospital', CTV News, 3 February 2019.
<https://www.ctvnews.ca/canada/cannabis-chocolate-bar-sends-two-children-to-hospital-1.4280830>

² Cave, R. '70-year-old Saint John man suffers heart attack after consuming cannabis lollipop', CBC News, 13 February 2019.
<https://www.cbc.ca/news/canada/new-brunswick/nb-saint-john-doctors-marijuana-edibles-1.5018362>