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Policy Planning and International Affairs Directorate
Health Canada
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RE: CONSULTATION ON POTENTIAL MARKET FOR CANNABIS HEALTH PRODUCTS THAT WOULD NOT REQUIRE PRACTITIONER OVERSIGHT

The Canadian Pharmacists Association (CPhA) is pleased to respond to the Health Canada consultation on the *potential market for cannabis health products that would not require practitioner oversight*. As the national voice of Canada's 43,000 pharmacists, we are committed to pharmacy practice excellence and optimal health outcomes for Canadians through safe and effective drug therapy.

In response to the evolving health care needs of their patients, over the past several years, CPhA and pharmacy partners across Canada have helped to expand pharmacist education in the area of cannabis with evidence-based information and tools. These resources include knowledge of the various types of cannabinoids, therapeutic effects, pharmacokinetics, routes of administration, dosing considerations, adverse effects and potential interactions. The Ontario College of Pharmacists also recently made cannabis education mandatory for pharmacists in the province, understanding that patients will increasingly look to pharmacists for advice about cannabis just as they do for other health and drug-related topics.

In consideration of the growing public interest in cannabis for health and self-care, as well as the thriving illegal market and spread of potentially misleading information, we believe it is important that Health Canada enable a pathway to market for cannabis health products (CHPs) with demonstrated safety, quality and effectiveness and establish the necessary parameters around production, marketing and sales to protect the health and safety of Canadians.

Whereas we are in full support of the appropriate regulation of CHPs in Canada, CPhA is opposed to Health Canada's proposal that these products be sold in recreational cannabis retail locations. We believe that people seeking cannabis products solely as health products should not be driven toward retail locations that cater to the recreational drug market or locations where Canadians cannot access trusted health advice from licensed and regulated health professionals.



Differentiating recreational cannabis and cannabis for health purposes

Recreational cannabis products differ greatly from those that can be produced for therapeutic purposes. Medical cannabis users and those seeking CHPs have the goal of alleviating symptoms and minimizing intoxication. The main cannabinoid currently being used for such purposes is cannabidiol (CBD), which has been found to be an effective treatment for some conditions, including forms of epilepsy. CBD products are not psychoactive and will not cause dependency, however some patients may achieve positive outcomes through a mix of cannabinoids, including low concentrations of Tetrahydrocannabinol (THC).

We have already begun to see the consequences of the blurred lines between the recreational and medical cannabis framework where government policies have prioritized the recreational cannabis stream at the expense of patients who use medical cannabis. ***As a result, patients are finding it easier to access the cannabis they need in illegal and recreational markets instead of through the proper medical cannabis access channels.*** In fact, according to a recent CPhA survey:

- 61% of medical cannabis users are self-medicating with no medical oversight
- 60% are taking cannabis alongside other prescribed medications
- Only 24% of medical cannabis users believe that combining cannabis with other medications can lead to unwanted side effects or drug interactions

We are concerned that Canadians who are using cannabis for health/wellness reasons are being left without medical advice or seeking such advice from retail staff who have no training in pharmacology and the most up-to-date clinical evidence related to cannabis. This situation can lead to increased risks to patients associated with improper dosing, undiagnosed health problems and drug interactions. It is unfair to deny these vulnerable patients the same level of care that is available to those who require more common therapeutic options to manage their health, and we fear that the regulation of CHPs will only exacerbate this problem.

CHPs supported by scientific evidence that demonstrates their safety and efficacy should be separated from recreational drugs at the retail level. Governments would never ask patients to seek answers to their health needs from a liquor store, therefore it is equally irresponsible to expect patients to seek cannabis health products from recreational cannabis retailers.

Cannabis-based products that make health claims supported by evidence have no place in the recreational drug retail market or anywhere that patients cannot seek expert guidance from health care providers.

Pharmacists' role in self-care

Pharmacists are medication experts with the clinical knowledge and expertise to advise patients on a wide range of health and therapeutic products. While it is not a pharmacist's role to act as a gatekeeper for non-prescription health products, it is a pharmacist's role to engage with patients about self-care, provide unbiased information



and allow patients to make informed choices. This role certainly extends to the use of non-prescription CHPs and other natural health products.

As highly accessible and trusted health care providers, pharmacists have established relationships with their patients and access to their medication profiles and histories. They are also well-informed of the latest health information and evidence regarding therapeutic products and minor ailments. This knowledge enables pharmacists to provide advice about whether any therapeutic product is safe and appropriate for each individual patient. In the case of CHPs, Health Canada is proposing that these products could contain any cannabis ingredient or other medicinal ingredients. Pharmacists' knowledge of drug interactions will be especially helpful as patients consider taking CHPs in addition to other medications. Pharmacists can provide patients with follow-up care to find the appropriate dosing and help patients taper or adjust other medications to ensure the safe concurrent use of therapies.

Additionally, conversations with pharmacists about self-care products can lead to the detection of serious health issues that would otherwise go undetected. This situation can be highlighted by the story of a popular Ottawa radio host, Stuntman Stu, who approached his pharmacist to ask about Vitamin D. The pharmacist engaged him in a conversation and asked about his symptoms. Stu's symptoms were indicative of a much larger health issue and she suggested he make an appointment with his doctor as soon as possible. He took her advice, saw his doctor and was immediately diagnosed and treated for leukemia. This story demonstrates the important role that pharmacists continue to play in the age of self-care, and it underscores our firm belief that CHPs, along with all other health products, should be available in pharmacies where patients can engage with knowledgeable health care providers.

CPhA strongly recommends that pharmacists be included in the management and distribution of medical cannabis as well as cannabis-based health products. This will allow patients seeking cannabis therapy to be supported with the same level of clinical counselling and follow-up care as is provided to all other patients taking prescribed, over-the-counter or non-prescription medications.

Scheduling CHPs

With respect to determining the medical value and potential risks of CHPs, CPhA recommends that these products be incorporated into existing drug scheduling frameworks across Canada. As such, the scheduling of CHPs in all jurisdictions except Quebec (which maintains its own drug schedules) should follow the established national drug scheduling model developed by the National Association of Pharmacy Regulatory Authorities. This model consists of four categories of drugs with specific conditions for sale for each schedule and it is enforced by provincial/territorial regulators.

Regardless of whether a CHP is classified as a prescription, non-prescription or natural health product, we believe there is an important role for pharmacists to play in providing knowledgeable clinical information to patients at



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the point of sale. This level of care simply cannot be provided outside the pharmacy setting. Federal, provincial and territorial governments should work closely with pharmacy regulators and industry stakeholders to integrate and align cannabis regulations specific to the display, safety, security and record keeping with those of the established national drug scheduling model.

CPhA recommends that CHPs be incorporated into existing drug scheduling frameworks that regulate the display, safety, security and record keeping of drug and therapeutic products in pharmacies across Canada.

We appreciate the opportunity to participate in Health Canada's consultation on potential market for cannabis health products. CPhA will continue to advocate for a separate stream of therapeutic products and framework for accessing cannabis for health and therapeutic purposes that are distinct from the recreational drug retail framework. We further believe that access to these products should be supported by pharmacists who can provide expert clinical knowledge and ensure the safe and effective use of CHPs by patients. We look forward to working with Health Canada and other health care professional and industry partners to incorporate CHPs into the existing health products market.

Sincerely,

Glen Doucet
Chief Executive Officer