



CANADIAN
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DU CANADA

May 19, 2016

The Honourable Jane Philpott
Minister of Health
70 Columbine Driveway, Tunney's Pasture
Postal Location: 0906C
Ottawa, ON K1A 0K9

Dear Minister

As drug experts with an obligation to ensure optimal and safe use of medications, pharmacists have been following the medical marijuana file closely. It is our understanding that the Government of Canada, having chosen not to appeal the Federal Court's decision in the matter of *Allard v. Canada*, will be moving ahead shortly to amend the Marihuana for Medical Purposes Regulations (MMPR) to give effect to the Court's judgment. Given the process already underway to amend the MMPR, we urge you to also consider including a further amendment to the MMPR to allow pharmacists to dispense medical marijuana. We believe such an amendment would serve to both enhance patient and public safety and further respond to the Court's ruling by improving access under the existing Regulations.

The Canadian Pharmacists Association (CPhA) is concerned with the lack of an appropriate regulatory framework, and believe more should be done to enhance the safety, quality and accessibility of the product. Furthermore, we are deeply troubled about the proliferation of so-called medical marijuana dispensaries that are illegally providing health care advice to thousands of Canadians. A growing number of patients are choosing medical marijuana as a treatment; however, we also know that fewer than ten percent of Canadians who use medical marijuana obtain it through legal channels. As a result, most patients are obtaining the product from illicit providers, like marijuana dispensaries, without any oversight measures in place to protect patient and public safety.

This means that every day, Canadians are at risk without the expert advice that pharmacists provide. For many patients, medical marijuana is a third or fourth line treatment, meaning that patients are taking multiple medications. With every prescription, the potential for harmful drug interactions increases and the need for pharmacist oversight grows.

It is essential that prescribed therapeutic products which present the possibility of a drug interaction and other risks to patients are managed by a regulated health professional. As trusted medication experts, pharmacists are acutely aware of the potential harms associated with medical marijuana and are well-equipped to help mitigate these risks through medication management and patient counseling. Not only can they identify product-related problems, monitor adherence, and flag drug-seeking behaviours, pharmacists can also communicate critical information to the patient's prescriber to provide the best possible coordination of care.

Over 40,000 pharmacists serving nearly 10,000 urban, rural, and remote locations across Canada are well-equipped to immediately assume responsibility for medical marijuana management. Their expansive network is supported by a sophisticated infrastructure designed to handle narcotics and controlled substances that is equally suited to manage medical marijuana. Most importantly, they are trained health care professionals with pre-existing relationships with patients and prescribers, dedicated to promoting patient safety and education.



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While CPhA's priority is ensuring that medical marijuana is managed safely by licensed pharmacists, we acknowledge the Government's future plans to legalize and regulate marijuana for recreational use. As health care professionals, we urge you to differentiate medical marijuana from recreational forms, recognizing that any plan to legalize and regulate marijuana will not negate the need for a distinct regulated medical stream (for example, for patients under the age of majority).

Experience in other jurisdictions has demonstrated that addressing the MMRP's risks prior to legalization can help minimize risks to patients and the public once broader access is granted. The Government has a short window of opportunity to change the MMRP to improve patient access; it is only logical to capitalize on this opportunity to protect patient and public safety through a simple amendment to permit pharmacist dispensing of medical marijuana.

Given the short timelines involved to make such changes to the MMRP, we would request an opportunity to meet with you or your officials as soon as possible to discuss the proposed amendment and how pharmacists can improve access immediately under the MMRP, while improving safe and effective management of medical marijuana in Canada.

Yours sincerely

Perry Eisenschmid, BBA, MBA, C.Dir., H.R.C.C.C.
Chief Executive Officer

cc The Honourable Jody Wilson-Raybould, Minister of Justice and Attorney General of Canada
Bill Blair, Member of Parliament
David Pellmann, Executive Director, Office for Medical Cannabis