



**Neighbourhood
Pharmacy**
Association of Canada

Association canadienne
**des pharmacies
de quartier**

365 Bloor Street East, Suite 2003
Toronto, ON M4W 3L4

T : 416.226.9100

F : 416.226.9185

info@neighbourhoodpharmacies.ca

neighbourhoodpharmacies.ca

Written Submission for the Pre-Budget Consultations in Advance of the 2019 Budget

**By: Neighbourhood Pharmacy Association of
Canada**

Recommendation 1: That the Government of Canada ensure all relevant Federal *Cannabis Regulations* enable authorization of pharmacies and pharmacists to distribute and dispense cannabis for medical purposes, consistent with the authorization of hospitals and physicians to do so, and do not prohibit provincial authorization to do so.

Recommendation 2: That the Government of Canada establish a pharmacy sector consultation table to consider the impacts of regulatory and legislative changes to the sector with a view of creating better health outcomes for Canadians by ensuring accessibility and sustainability of the pharmacy sector.

Recommendation 3: That the government engage in meaningful and comprehensive consultation with key pharmacy sector stakeholders as it looks to establish a national pharmacare program, which could cost Canadian taxpayers an additional \$20 billion annually through increased taxes.

Recommendation 4: That the government look to partner with pharmacies across Canada on ways to mitigate the ongoing opioid crisis and reduce the potential harms associated with misuse, abuse, diversion, and addiction. Specifically, introduce regulatory reforms under the Controlled Drug Substances Act to amend the Controlled Drugs and Substances Act (CDSA) to enable pharmacists to review, adapt and taper opioid prescriptions, and further prevent the harms associated with addiction.

Introduction

The Neighbourhood Pharmacy Association of Canada (Neighbourhood Pharmacies) appreciates the opportunity to provide this Submission Brief to the House of Commons Standing Committee on Finance for its pre-budget consultations in advance of Budget 2019.

Neighbourhood Pharmacies represents Canada's leading pharmacy organizations who deliver high value, quality care to Canadians in all models including chain, banner, long-term care, specialty and independent pharmacies as well as grocery chains and mass merchandisers with pharmacies. Our members are home to the most trusted providers of drug therapies, pharmacy-based patient services, and innovative healthcare solutions. We advocate for community-based care through our members' high accessibility and proven track record of providing optimal patient care closer to where patients live, work and play. By leveraging over 10,500 pharmacies conveniently located in every community across Canada, Neighbourhood Pharmacies aims to advance sustainable healthcare for all stakeholders.

The following sections in this document outline the issues that must be considered in creating an efficient and effective healthcare system that delivers better health outcomes for Canadians. There are four areas we wish to focus our comments on:

1. Cannabis for medical purposes;
2. Establishing a pharmacy sector consultation table;
3. Ensuring Canadians have access to innovative medicines when and where they need them (Pharmacare); and,
4. Optimizing the Role of Pharmacy in addressing the opioid crisis.

It is important to note the value of pharmacy to Canada. Community pharmacies hold significant value for middle class and at-risk Canadians. A recent series of reports by the Conference Board of Canada concluded that the community pharmacy sector generated more than \$16 billion in economic activity and supported nearly 250,000 jobs in 2016. The direct economic output of Canada's community pharmacy sector is comparable to that of the motor vehicle manufacturing sector.

Your community pharmacy is an important economic engine supporting thousands of jobs and helps create efficiencies in Canada's broader health system by providing valuable health services to Canadians in convenient retail locations when and where they need care, contributing to improved individual and population health.

Canada's Medical Cannabis Regime

Neighbourhood Pharmacies remains committed to creating efficiencies for Canada's broader health system by providing valuable patient care in convenient retail locations. We were pleased to see in the recently published *Cannabis Regulations* that pharmacies will be authorized to make approved medications containing cannabis available to Canadians. This is a commendable first step; however, we must not lose sight of the overarching mandate of the medical purposes regime: to provide valuable patient care and ensure the accessibility of viable medications.

We maintain that pharmacists and pharmacies should be authorized to distribute cannabis for medical purposes, consistent with the authorization of hospitals and physicians to do so. Pharmacies provide a safe, secure distribution option for patients. With 10,500 locations in virtually every Canadian neighbourhood, we can ensure equitable access for all medical patients. The expertise of pharmacists in medication management allows them to effectively consult patients on the safe and appropriate use of cannabis for medical purposes and ensure they are adhering to a proper dosage.

Establishing a Pharmacy Sector Table

As public and private insurers are confronted with increasing budgetary constraints and demands based on the complexity and population health needs of an ageing population, pharmacies are creating capacity within our healthcare system nationally to meet the provision of care needs for Canadians when and where they need it. Whether it be in long-term care, community based or specialty pharmacy, along with technological advancements that meet the needs of remote and rural communities – we are the most accessible healthcare providers reducing the barriers to care for Canadians.

The value of the investments made by the pharmacy sector to increase capacity and provide vital infrastructure to meet the needs of the population are currently underutilized. It's time to modernize our care delivery models and vision for the next century – that means putting pharmacy at the centre of care delivery and reinvesting in pharmacy services by enabling pharmacists to practice at the top of their professional scope nationally.

Establishing a pharmacy sector table will ensure that policies enacted by various departments consider the impacts of regulatory and legislative change to the pharmacy sector and capacity to deliver optimal care to Canadians when and where they need it.

Moving forward, when policies such as: pCPA and PMPRB pricing reforms, Pharmacare, Cannabis, Public Health Modernization (Vaccine distribution and provision, responding to the Opioid Crisis), Drug Shortages, and Wait Times Strategies are considered, pharmacy must be at the table as the most accessible frontline healthcare providers.

Ensuring the Affordability and Accessibility of Medicines

Pharmacies are a critical partner in delivering optimal care that creates better health outcomes for Canadians. For more than thirty years, the PMPRB has established a successful track record in its role as a national regulatory agency with the mandate of ensuring that the prices of patented medicines in Canada are not excessive. The recent proposed changes to the PMPRB's guidelines, to alter the list of countries used by the PMPRB to determine the excessive cost of medicines, suggest the government is committed to decreasing the cost of a patented medicine at the expense of accessibility to new and innovative medicines for Canadians.

What is particularly concerning to Neighbourhood Pharmacies is the potential impact that the proposed changes could have on the accessibility of innovative treatment options and resulting patient outcomes. Significant reductions in the price of patented medicines may result in a decrease, delay, or significant wait times, along with potential shortages of new medicines being launched in Canada. This could result in more patients and caregivers waiting longer for therapies and potentially diminish survival rates. Furthermore, increased barriers to patients may have significant impacts on the operating efficiency of pharmacies and provision of care and services. As a G-10 nation, we should be striving to provide rapid access to the latest innovations to ensure optimal outcomes within the budgetary constraints of the provinces. The pCPA was established to deliver greater value to the provinces in addition to the mandate of the PMPRB to ensure non-excessive pricing.

Neighbourhood Pharmacies has been active in providing solutions to the affordability and accessibility of patented medicines. We have developed a national strategy for reinvestment of savings generated by the exclusive negotiations with generic manufacturers at the pan-Canadian Pharmaceutical Alliance table and proposed federal changes to the PMPRB that may lead to improvements and ensure levels of care are maintained. It is important for government to consult with pharmacy as it reviews its approach to patented medicines, to ensure patients aren't harmed by unintended consequences of pricing reforms.

Pharmacare

Neighbourhood Pharmacies believes in timely access to medications that includes timely access to innovative products and maintains patient choice. This requires that prices for innovative medicines be affordable but still competitive to encourage innovation and access to new therapies as well as removing some of the barriers to coverage which currently exist through an administratively arduous process.

For national pharmacare to work, drug formulary approvals must be expedited to ensure Canadians have prompt access to new medicines, at prices which provide good value to payors.

A national pharmacare strategy needs to be affordable to taxpayers. Last fall, an analysis by The Parliamentary Budget Officer estimated that a universal first-payor approach to pharmacare could cost \$20 billion a year. This represents about one percent of Canada's GDP and twice the federal government's annual deficit projections in each of the next few years.

Neighbourhood Pharmacies believes in a financially sustainable healthcare system that includes income-based subsidies for low income and high need patients. A truly progressive pharmacare system will ensure provision of scarce taxpayer dollars to where they are most needed. Today, 1.8% of Canadians find themselves without prescription drug coverage. Of those individuals, a small percentage cite cost as a reason for their lack of coverage. It is reasonable to ask those who can afford it to contribute moderate amounts towards co-pays and deductibles so that public subsidies can be targeted towards lower income and high-need patients.

The solution is to raise the level of accessibility and reduce complexity for both patients and prescribers thus increasing public confidence in the system and reducing administrative costs to both governments and industry. To bring these solutions to the table and help ensure successful implementation, pharmacy stakeholders must be part of ongoing consultations as the government develops and implements its approach to national pharmacare.

Opioid Crisis

Neighbourhood Pharmacies recognizes and supports the federal government's measures to combat the opioid crisis. We support the Opioid Action Plan for Canada and stand with the government and won't rest on our laurels in putting forward solutions to prevent further harms because we believe there is more work to be done. As a starting point, we can take further measures to prevent the harms associated with addiction by enabling the provision of pain management services provided by pharmacies. This will complement current harm-reduction approaches offered in pharmacy, including provision of naloxone kits and enabling illicit drug users' access to prescription treatments in high-risk communities through pharmacies.

Communities across Canada are faced with an increasing opioid crisis with limited treatment options and tools to combat the problem. Cannabis, when used appropriately, is an appropriate secondary or tertiary treatment option for several conditions that could potentially reduce the number and dose of opioid prescriptions. Allowing pharmacies and pharmacists to distribute cannabis for medical purposes represents an important step toward reducing the reliance on opioids by Canadian patients. This should be paired with an exemption of pharmacies from the *Controlled Substances Act* to allow them to change prescriptions for opioid users, reducing dosages or prescribing a substitute.

Neighbourhood Pharmacies and the Ontario Pharmacists Associations (“OPA”) have formally proposed a pharmacy-delivered pain management program for Ontarians prescribed opioids to Assistant Deputy Minister and Executive Officer, Suzanne McGurn, informed by the 2017 Canadian Guidelines for Opioids for Chronic Non-Cancer Pain and the Health Quality Ontario Quality Standards for Opioid Prescribing and aligned with current opioid strategies being pursued by several health professional colleges. This initiative will be the first of its kind in Canada (though Australia has enacted a similar program) aimed to address the prescription-related elements of the crisis, and enhance the province’s prevention strategies, by providing patients with one-on-one support to appropriately manage their pain while mitigating the potential risk of opioid dependence.

Conclusion

By allowing pharmacies to distribute and dispense cannabis for medical purposes, unlocking pharmacists’ ability to prevent Canadians with chronic pain from becoming addicted to opioids, and meaningfully engaging the sector on regulatory and legislative reforms, government will help ensure all Canadians get the care and therapies they need, closer to home.