

POLICY CATEGORY
POLICY NAME
POLICY NUMBER
AUTHORITY DERIVED FROM
ORIGINAL APPROVAL DATE
ORIGINAL MOTION NUMBER
LATEST REVISION DATE
LATEST REVISION MOTION

GOVERNING THE MEMBERSHIP
Position Statement: Cannabis for Medical and Non-Medical Purposes
GM-PP-C-01
Act Section 5(1)(a)(c-e)(h)(k), Section 15(1)(c), Section 51(a)
February 5, 2018
C-18-02-05

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New Brunswick College of Pharmacists Ordre des pharmaciens du Nouveau-Brunswick

Position Statement: Cannabis for Medical and Non-Medical Purposes

BACKGROUND

Public interest must always be in the forefront of our considerations as a pharmacy regulator. The New Brunswick College of Pharmacists (the College) must ensure that we uphold professional standards that have, for decades, served the public and our professionals well. These have contributed to building the safety and integrity of our health care system. At the same time, we acknowledge and are responsive to new challenges and requirements. This position statement sets out the path forward we expect to take on this important issue.

We must ensure that external pressures are not causing us to bypass normal checks and balances in the health care system.

CANNABIS FOR MEDICAL PURPOSES

In November 2016, *The Final Report of the Task Force on Cannabis Legalization and Regulation*¹ (the Task Force Report) outlined recommendations for a dual-access system regulating cannabis for medical and non-medical purposes. The report proposes to evaluate the medical access framework in five years.

The Task Force Report recommends that the federal government be prepared to make broad changes to the distribution of cannabis for medical purposes if it is found that “reasonable access is being compromised” and that this “could include pharmacy distribution.”

Currently available information does not support pharmacy distribution of cannabis.

The College supports Health Canada’s established drug approval process. Pharmacy practitioners rely on this rigorous process to ensure that the products sold in pharmacies have met standards for efficacy, safety, and quality. Such a process is not in place for cannabis.

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MONITORING FREQUENCY:
MONITORING METHOD:
REVISION FREQUENCY:
RESPONSIBILITY:

In future, for pharmacy practitioners to be involved in distribution of cannabis for medical purposes, there would need to be:

- a full Health Canada approval process including review of efficacy, safety, and product quality
- regulation and standards that are similar to controlled substances with respect to storage and security, promotion, tracking, and accountability
- a prescription or similar practitioner authorization. The College recognizes the importance of interdisciplinary care for complex patients and this could include medical directives or other team approaches.

Apart from such a system, cannabis must only be available from pharmacies as part of rigorously-designed peer-reviewed studies that have been approved by a Research Ethics Board (REB). Such studies must also be supported by a *No Objection Letter* from Health Canada, demonstrating a Clinical Trial Application has been made, and comply with the *Food and Drug Regulations Part C, Division 5: Drugs for Clinical Trials Involving Human Subjects*. There is a need for high-quality evidence on the efficacy and safety of cannabis, and **we encourage clinical trials and pharmacist participation in them.***

Currently available information does not support pharmacy distribution of cannabis. For pharmacy distribution, cannabis for medical purposes requires a full Health Canada drug approval process including review of efficacy, safety, and product quality.

For many years, pharmacists have been at the forefront of smoking cessation, helping patients to quit using tobacco. Cannabis smoke contains many of the same carcinogenic chemicals found in tobacco smoke.² It is the position of the College that smoked cannabis products should be subject to the same provincial or territorial legislation as smoked tobacco products. If pharmacy practitioners are involved in distribution of cannabis in the future (assuming the above criteria have been met), pharmacists should recommend non-smoked forms of cannabis only. The New Brunswick College of Pharmacists recommends that the federal government prohibit marketing of cannabis for medical use.

CANNABIS FOR NON-MEDICAL PURPOSES

In November 2016, the Task Force Report¹ outlined recommendations for a dual-access system regulating cannabis for medical and non-medical purposes. It is the position of the College that pharmacy practitioners must not be involved in the distribution of cannabis for non-medical purposes.

Further, distribution sites for non-medical cannabis must not be permitted to use terms such as “dispensary” or pharmacy-related symbols such as a green cross, which may lead the public to believe that the distribution site is a pharmacy or that it has professional oversight from pharmacy practitioners.

**Prior to engaging in clinical trials or research projects related to cannabis for medical purposes, pharmacy managers must notify the New Brunswick College of Pharmacists.*

The College recommends that suppliers of cannabis for any purpose follow Good Production Practices as required by the *Access to Cannabis for Medical Purposes Regulations*³ or equivalent quality standards. Producers should also adhere to Packaging, Labelling and Shipping standards set out in the *Access to Cannabis for Medical Purposes Regulations*⁴ or equivalent standards, particularly regarding secure supply chains, appropriate product labelling, and child-resistant packaging.

The federal government should restrict advertising and marketing of cannabis, so as not to promote consumption. This could be similar to restrictions on alcohol or tobacco.

Pharmacy professionals must not be involved in the distribution of cannabis for non-medical purposes.

GUIDANCE FOR PHARMACY PROFESSIONALS

The College encourages pharmacy educators to develop, or make available, evidence-based high-quality programming on cannabis (both medical and non-medical) for entry-to-practice curriculum as well as continuing education.

The College recognizes that pharmacy professionals are currently providing care to patients who also use cannabis (for medical and non-medical purposes). In the current environment, pharmacists should have a basic understanding of cannabis use, similar to what is expected for alcohol or tobacco use. This may include, for example, understanding drug interactions or counselling patients on misuse.

The professional role of a pharmacist will be upheld in the dispensing of cannabis for medical purposes when proper standards for efficacy, safety, and quality are in place.

If pharmacy professionals are involved in distribution of cannabis in the future (assuming criteria discussed in the previous section have been met), pharmacists would be expected to fully understand the therapeutics of cannabis. For example, they would need to have the knowledge and ability to adjust doses, recommend product substitutions in case of recall or shortage, monitor and report adverse effects, and prevent and manage inappropriate use.

As with all other medication and the provision of patient care, pharmacists are bound by Standards of Practice to ensure a patient’s best interest is at the core of all activities. Pharmacy professionals are expected to practice in accordance with the Code of Ethics and put quality care and patient safety above other considerations.

DEFINITIONS

Cannabis	Cannabis sativa is the botanical name for this ubiquitous herbaceous plant, which includes the drug type (“marijuana”) as well as industrial hemp. Cannabis contains hundreds of chemical substances, among which are over 100 known as “cannabinoids.” ¹
Cannabinoids	A class of chemical compounds that act on receptors in cells in the brain and body. The most well-studied cannabinoid is THC (tetrahydrocannabinol), the primary psychoactive compound of cannabis (i.e., the chemical responsible for the “high”). Increasing attention is also being paid to another key cannabinoid—CBD (cannabidiol). Unlike THC, CBD is not psychoactive and may in fact counteract some of the psychoactive effects of THC. There is increasing scientific study into the potential therapeutic uses of CBD. ¹
Cannabis for Medical Purposes	<p>According to Health Canada, individuals with a medical need, and who have the authorization of their health care practitioner, may access cannabis in three ways: continue to access quality-controlled cannabis by registering with licensed producers, register with Health Canada to produce a limited amount for their own medical purposes, or designate someone else to produce it.</p> <p><i>(November 15, 2017 https://www.canada.ca/en/health-canada/services/publications/drugs-health-products/understanding-new-access-to-cannabis-for-medical-purposes-regulations.html)</i></p> <p>Those whose medical needs cannot be met in a legal regime (e.g., those below the legal age or those who require a high-potency product if not legally available) will need a method of legal access.¹</p>
Cannabis for Non-medical Purposes	A regulated supply of cannabis for personal or recreational use. ¹

Marijuana

The word “marijuana” is a common term used most often in reference to the dried flowers and leaves of the cannabis plant. It is a slang term that is not scientifically precise.

¹ A Framework for the Legalization and Regulation of Cannabis in Canada: The Final Report of the Task Force on Cannabis Legalization and Regulation. (2016). Available from: <http://healthy Canadians.gc.ca/task-force-marijuana-groupe-etude/framework-cadre/index-eng.php>. Accessed April 3, 2017.

² Health Canada. Information for Health Care Professionals: Cannabis (marihuana, marijuana) and the cannabinoids. (2013). Available from: <http://www.hc-sc.gc.ca/dhp-mps/marihuana/med/infoprof-eng.php>. Accessed March 28, 2017.

³ Access to Cannabis for Medical Purposes Regulations (SOR/2016-230), s 63. SUBDIVISION D – Good Production Practices. Available from: <http://laws.justice.gc.ca/eng/regulations/SOR-2016-230/page-8.html#h-15>. Accessed April 3, 2017.

⁴ Access to Cannabis for Medical Purposes Regulations (SOR/2016-230), s 80. SUBDIVISION F – Packaging, Labelling and Shipping. Available from: <http://laws.justice.gc.ca/eng/regulations/SOR-2016-230/page-10.html#h-17>. Accessed April 3, 2017.