



GOVERNMENT OF BARBADOS

PHARMACY COUNCIL



MINISTRY OF HEALTH AND WELLNESS

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Our Ref: 41 Vol.2

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Date: September 20, 2019

Mr. Pedro Eastmond
Clerk of Parliament
Parliament
Parliament Building
Bridgetown

Dear Mr. Eastmond

Reference is made to your correspondence dated September 11, 2019 inviting the Pharmacy Council to make a submission to the Joint Select Committee on the Medicinal Cannabis Industry Bill, 2019.

Please find enclosed, the position paper submitted by the Pharmacy Council.

Your cooperation with this matter is appreciated.

Yours Faithfully,

Shirley Holder(Ms.)
CHAIRMAN

TO: THE JOINT SELECT COMMITTEE ON MEDICINAL CANNABIS
FROM: THE PHARMACY COUNCIL
DATE: SEPTEMBER 20TH, 2019

RE: POSITION PAPER ON MEDICINAL CANNABIS

Background

The Pharmacy Council is of the view that medicinal cannabis has its place in the treatment of some diseases as indicated in the research material that is presently available. We will therefore support an Act that can add value to our economy and improve the wellbeing of our patients.

To date, the Pharmacy Act (CAP 372D), the Health Services (Control of Drugs) Regulations and the Drug Abuse, Prevention and Control Act (CAP 131) predominantly regulate the practice of dispensing drugs in Barbados, particularly controlled drugs. Pharmacists are therefore adequately trained to ensure the accurate provision of these preparations to patients and they do so while precisely maintaining the record keeping procedures outlined in the cited Acts.

Comments on The Medicinal Cannabis Bill 2019

The Pharmacy Council has some concerns as it relates to the Medicinal Cannabis Bill 2019. These concerns are highlighted below:

1. Current practice dictates that a substance which is categorized as a 'controlled drug', should fall under the ambit of the Ministry of Health and Wellness. Medicinal cannabis should therefore conform to the previously highlighted Laws. The Pharmacy Council wishes to recommend that the dispensing and regulation of medicinal cannabis falls under the ambit of the Ministry of Health and Wellness while the cultivation of cannabis falls under that of the Ministry of Agriculture and Food Security.

2. Section 25 (1) (a) explains that the drug can be obtained by prescription or recommendation. Moreover, Section 29 (2) states the pharmacist or authorized person may dispense or supply medicinal cannabis on the submission of a prescription or recommendation. Medicinal cannabis being a 'controlled drug', should only be acquired through a prescription. The current laws dictate the requirements and controls for dispensing and providing controlled drugs. As such, the Council wishes to recommend that the method of obtaining medicinal cannabis be limited solely to the presentation of a prescription which is a legally enforced document.

3. The Bill defines a 'therapeutic facility' as a premise granted a Retail Distributor License to sell, dispense or provide medicinal cannabis prescribed or recommended by a medical practitioner. The Council wishes to recommend that the dispensing of medicinal cannabis be limited to the pharmacy especially because of the strict controls already in place with regards

to the inspection and regulation of pharmacies. Moreover, the Council wishes to obtain further information on the proposed regulation and inspection of the therapeutic facilities.

Conclusion and Recommendations

The health of the nation is of utmost importance and government should ensure that there is due diligence with regards to investigations on the effectiveness of the drugs on patient health and wellbeing. Moreover, The Pharmacy Council is of the view that the procedure for introducing additional drugs needs to be well-balanced with enacting new laws which are in alignment with the existing laws.

In summary, the Council therefore wishes to recommend the following:

1. Dispensing and regulation should fall under the ambit of the Ministry of Health and Wellness while the cultivation of cannabis should fall under the Ministry of Agriculture and Food Security.
2. Medicinal Cannabis should be available solely by prescription
3. The dispensing of Medicinal Cannabis should be limited to pharmacies

This paper is submitted for your consideration.

Shirley Holder



Chairman
Pharmacy Council