

March 17, 2026

Adele Fifield
NAPRA Executive Director
National Association of Pharmacy Regulatory Authorities
M615-1554 Carling Avenue
Ottawa, Ontario
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Via email: info@napra.ca

Dear Adele Fifield,

Re: NAPRA Consultation on “Model Document for Pharmacy Regulatory Authority Use – Non-sterile Compounding Standards” and “Model Document for Pharmacy Regulatory Authority Use – Sterile Compounding Standards.”

Canadian Veterinary Medical Association Guidelines for the Legitimate Use of Compounded Drugs in Veterinary Practice (2006)

We write on behalf of the *Canadian Veterinary Medical Association (CVMA)* and the *Canadian Council of Veterinary Registrars (CCVR)* regarding the above matters.

The use of compounded drugs is both necessary and beneficial for the treatment of veterinary patients. However, we recognize a potential exists for causing harm to animals and the public when drugs are compounded without adherence to the principles of contemporary pharmaceutical chemistry and current good compounding practices, as outlined by provincial standards of practice for compounding by pharmacists and veterinarians.

We support NAPRA standards for sterile and non-sterile compounding and support that pharmacy regulators adhere to the standards when regulating the practice of compounding which includes drugs for veterinary use.

We understand that NAPRA is conducting a consultation on “*Model Document for Pharmacy Regulatory Authority Use – Non-sterile Compounding Standards*” and “*Model Document for Pharmacy Regulatory Authority Use – Sterile Compounding Standards*.”

A pharmacy that compounds products for veterinary practices across Canada has communicated to Canadian veterinary practices that the updated model documents may impact the ability for practices to prescribe compounded drugs for in-clinic use or for further dispensing to clients and that standards related to establishment of beyond use dates may be changed.

The model documents distributed for consultation may be interpreted to mean the dispensing of compounded drugs can now only be directly to one specific patient and that a prescriber can no longer acquire compounded drugs for in office use. Veterinarians are faced with limited approved veterinary drugs for the variety of species they treat. A restriction on access to compounded drugs for in office use or further dispensing to clients will impact a veterinarian’s ability to treat these patients in a timely manner and can lead to concerns for animal welfare.

CVMA and CCVR note that a veterinarian may issue a prescription for a quantity of a compounded drug in the reasonable expectation of an identified need in a patient or patient group for the purpose of maintaining a quantity of the compounded drug for in-office use or further dispensing to an end user that

is reasonably expected to be used before the beyond use date. This is common practice among veterinary practices in most jurisdictions, and several have professional practice standards that expressly permit this activity.

CVMA and CCVR are of the opinion that this satisfies the Health Canada requirement that the prescribing and dispensing of compounded drugs is only in the context of a patient – professional relationship, which is maintained through the prescribing and dispensing by the compounding pharmacist or veterinarian and the prescribing veterinarian.

We understand that beyond use dates are to be determined using evidence-based information, including manufacturer’s documentation, on sterility, stability, compatibility, and degradation of components.

There are concerns for veterinary practices regarding shorter beyond use dates that include increasing costs and drug wastage which can be a barrier to access to care for the veterinary patient. We question whether beyond use dates for veterinary patients may differ than those for human patients which may not be accounted for in the proposed Model documents. If there is an opportunity for review of stability data that supports longer BUDs for the veterinary patient and if there is scientific evidence to support this, we would ask for further guidance in the proposed Model documents for veterinary compounding that balances patient safety with cost and accessibility to care concerns.

CVMA and CCVR are concerned that if a veterinary perspective was not considered in the development of the proposed Model standards, the importance of maintaining the ability for a pharmacist to dispense to veterinarians for in office use or further dispensing to clients and determining appropriate beyond use dates for veterinary patients may not have been addressed or considered in the context of veterinary practice.

While we understand that the Model documents are used by provincial pharmacy regulators and that provincial veterinary regulators may engage at the provincial level on standards for compounding, CVMA and CCVR are of the opinion that addressing the veterinary specific compounding concerns in the NAPRA Model documents support a consistent national approach. **We would welcome an opportunity to engage and collaborate with NAPRA representatives regarding the Model standards to ensure that implementation by regulatory authorities considers the use of compounded products in veterinary patients and does not have unintended consequences on veterinary practice.**

CVMA, CCVR and the Canadian Animal Health Institute are in the process of updating the ‘*Canadian Veterinary Medical Association Guidelines for the Legitimate Use of Compounded Drugs in Veterinary Practice (2006)*’. This document was a collaboration of a number of provincial and national organizations including NAPRA. The stated purpose of this document is to clarify legislation and policy regarding the compounding and prescribing of compounded products for use in animals.

We invite NAPRA representatives to consult on amendments to the ‘*Canadian Veterinary Medical Association Guidelines for the Legitimate Use of Compounded Drugs in Veterinary Practice (2006)*’.

Sincerely,



Megan Bergman, DVM
Chair
Canadian Council of Veterinary Registrars



Tracy Fisher, DVM
President
Canadian Veterinary Medical Association