

Consultation Survey: Providing Pharmacy Services for Animals Policy

Thank you for taking the time to participate in this consultation survey for the draft **Providing Pharmacy Services for Animals policy** (the “policy”).

- The survey has 10 to 20 questions, depending on the responses selected
- Required questions are marked with a “*”
- It should take approximately 10 minutes to complete
- You can pause the survey at any time and complete it later using the same device

This survey closes at **4:00 pm ET October 26, 2026**.

The survey is completely anonymous, with the exception of an organization that voluntarily discloses its name. Your responses will be combined with those of the other participants and shared in aggregate form.

To tailor the survey questions and assist with analysis of the results, please take a moment to tell us about yourself.

1. If you are responding on behalf of an organization, please provide the organization name:

*** 2. Please tell us who you are.**

- ☐ A pharmacy professional
- ☐ A member of the public
- ☐ A veterinary professional
- ☐ A pharmacy employee (unregulated)

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*** 3. As a pharmacy professional, what is your class of registration?**

- ☐ Part A pharmacist (including intern, As of Right)
- ☐ Part A pharmacy technician (including intern technician, As of Right)
- ☐ Part B pharmacist
- ☐ Part B pharmacy technician

*** 4. What type of veterinary professional are you?**

- ☐ Veterinarian
- ☐ Veterinary technician
- ☐ Other (please specify)

*** 5. Are you a pharmacy owner or Designated Manager?**

- ☐ Yes
- ☐ No

*** 6. Which of the following describes your primary workplace?**

- ☐ Community pharmacy
- ☐ Hospital pharmacy
- ☐ Non-accredited workplace (e.g., Family Health Team, industry, academia, government, correctional facility, public health)
- ☐ Other (please specify)

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*** 7. We are interested in knowing what services you currently provide for animals. Please check all that apply.**

- ☐ Dispense prescription drugs directly to clients, for animal patients
- ☐ Sell non-prescription drugs or health products directly to clients, for animal patients
- ☐ Compound preparations for animal patient-specific prescriptions
- ☐ Sell compounded preparations to a veterinarian to dispense to their client
- ☐ I do not currently provide services for animals
- ☐ Other (please specify)

8. If you have completed any veterinary-specific training or continuing education, please describe.

*** 9. Approximately what percent of your total monthly prescriptions, including compounded preparations, are for animals?**

- ☐ Less than 10%
- ☐ 10% to 50%
- ☐ 51% to 90%
- ☐ More than 90%

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10. Thinking about dispensing or selling drugs for animals, please rank the following categories from the MOST to LEAST often used, by:
> clicking the stacked lines and dragging the selected option to the desired position, *or*
> using the arrows to move the selected option up or down.

		Health Canada drug approved for human use
		Health Canada drug approved for veterinary use
		Compounded preparation using Active Pharmaceutical Ingredient of compendial quality
		Compounded preparation using other ingredients (i.e., in the Food Chemicals Codex, analytical reagent grade, or American Chemical Society (ACS) certified)
		Compounded preparation using Health Canada drug approved for veterinary use
		Compounded preparation using Health Canada drug approved for human use

*** 11. When providing services for animals directly to the client, approximately how often do you collaborate with the veterinarian?**

Rarely, if ever	Occasionally	About half of the time	Frequently	Most of the time
☐	☐	☐	☐	☐

Additional comments

12. What, if any, challenges have you experienced providing pharmacy services for animals?

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Policy Section: Selling or Dispensing to Clients [lines 46 to 49]

"Pharmacy professionals must:

- Practice within the limits of their knowledge, skills and judgment
- Have veterinary references and resources available to provide pharmacy services to animals safely"

Rationale: Pharmacy professionals are always expected to practice within the limits of their knowledge, skills and judgment. Because the animal is the patient (not the client) and there are no entry to practice competencies related to providing pharmacy care or services to animals, this is important to emphasize in the interest of patient safety. The current [pharmacy library requirements](#) do not include any veterinary references.

*** 13. Please rate your level of agreement with these expectations.**

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
The expectations are clear	☐	☐	☐	☐	☐
The expectations are reasonable	☐	☐	☐	☐	☐
The expectations are achievable	☐	☐	☐	☐	☐

If you disagree or strongly disagree, please explain why

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Policy section: Selling or Dispensing to Clients [lines 50 to 56]

"Pharmacy professionals must sell or dispense a drug exactly as prescribed:

- Modification of any component of the prescription must be approved by the veterinarian prior to provision to the client.
- This includes the drug, the brand of drug, dose, dosage form, strength, or directions for use.
- Consult with the appropriate veterinary professional when there are questions about the animal's condition or treatment plan."

Rationale: Human and animal physiology differ in important ways and changes to the prescription could put the animal at risk. The outcome of these expectations is that the animal receives the exact prescription as intended by the veterinarian, regardless of whether a pharmacy professional or veterinarian dispenses it.

* 14. Please rate your level of agreement with these expectations.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
The expectations are clear	☐	☐	☐	☐	☐
The expectations are reasonable	☐	☐	☐	☐	☐
The expectations are achievable	☐	☐	☐	☐	☐

If you disagree or strongly disagree, please explain why

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Policy section: Selling or Dispensing to Clients [lines 57 to 64]

"Pharmacy professionals must only dispense or sell a drug for Extra-Label Drug Use (ELDU) pursuant to a prescription following the same decision-making cascade as veterinarians:

- When a drug approved for veterinary use is not available, dispense or sell a drug approved by Health Canada for human use
- When a client presents a prescription for a non-prescription drug product, it may be dispensed or sold
- When an approved drug is not available, and a therapeutic need exists, dispense a compounded preparation"

Rationale: Due to the relatively small number of Health Canada drugs approved for "veterinary use only", ELDU is a common practice. The Therapeutic Decision Cascade for Animal and Public Safety developed by the Canadian Veterinary Medical Association is a risk-based approach to support responsible ELDU. It is included in the College of Veterinarians of Ontario's Prescribing a Drug practice standard and included in this policy to align the expectations across professions.

* 15. Please rate your level of agreement with these expectations.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly Disagree
The expectations are clear	☐	☐	☐	☐	☐
The expectations are reasonable	☐	☐	☐	☐	☐
The expectations are achievable	☐	☐	☐	☐	☐
The decision-making cascade should be included in the policy	☐	☐	☐	☐	☐

If you disagree or strongly disagree, please explain why

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Policy section: Selling to Veterinarians [lines 67 to 70]

"Pharmacy professionals may sell a drug to a veterinarian, pursuant to a written order, for the purposes of administering or dispensing to a client within their practice:

- The quantity of drug sold must be in an amount and occur at a frequency that is reasonable for the veterinarian-client-patient relationship
- Maintain a record of these orders and sales for a minimum of two (2) years"

Rationale: This is included to ensure registrants understand that the act of selling to a veterinarian is done pursuant to an order, not a prescription, in accordance with federal legislation.

* 16. Please rate your level of agreement with these expectations.

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
The expectations are clear	☐	☐	☐	☐	☐
The expectations are reasonable	☐	☐	☐	☐	☐
The expectations are achievable	☐	☐	☐	☐	☐

If you disagree or strongly disagree, please explain why

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Policy section: Compounding [lines 73 to 81]

"Pharmacy professionals must:

- Adhere to Health Canada's Policy on Manufacturing and Compounding Drug Products in Canada (POL-0051)
- Compound a preparation, pursuant to a prescription, from a drug approved for veterinary use, or if that is not possible, from a drug approved for human use, or, if that is not possible, from an active pharmaceutical ingredient
- Ensure the formulation and dosage form is safe and appropriate for use in the animal species, and for use in animals that may enter the food chain, ensure all ingredients are safe for subsequent human consumption"

Rationale: To minimize risks to animals and humans, the expectation is that pharmacy professionals adhere to Health Canada's Policy on Manufacturing and Compounding Drug Products in Canada (POL-0051) and prepare compounds using ingredients that pose the least risk of harm.

*** 17. Please rate your level of agreement with these expectations.**

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
The expectations are clear	☐	☐	☐	☐	☐
The expectations are reasonable	☐	☐	☐	☐	☐
The expectations are achievable	☐	☐	☐	☐	☐

If you disagree or strongly disagree, please explain why

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Policy section: Prescription Requirements [lines 83 to 92]

"Pharmacy professionals must, in addition to the requirements when dispensing for human patients:

- Include the animal species on the dispensing record and prescription label after the name of the animal or the name identifying a group of animals
 - For a group of animals, include the number of animals
 - For a targeted substance, include the client’s name on the label
- Include the withholding time provided by the veterinarian on the prescription label or an auxiliary label, when dispensing for a food-producing animal
- Document client information in the dispensing or patient record
- Meet Health Canada’s annual reporting requirements for the sale of any drug on the List of Certain Antimicrobial Active Pharmaceutical Ingredients"

Rationale: This identifies additional prescription requirements unique to animal patients and is intended to align with the practice of veterinarians. This further supports the desired outcome of having the client receive a similar prescription whether dispensed by a pharmacy or veterinary professional. For completeness, it also includes existing legislative requirements for medically important antimicrobials set out by Health Canada.

*** 18. Please rate your level of agreement with these expectations.**

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
The expectations are clear	☐	☐	☐	☐	☐
The expectations are reasonable	☐	☐	☐	☐	☐
The expectations are achievable	☐	☐	☐	☐	☐

If you disagree or strongly disagree, please explain why

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Policy section: Prescription Requirements [lines 93 to 97]

"Pharmacy professionals must:

- Charge fees in accordance with the pharmacy’s usual and customary dispensing fee and fee for professional services schedule not included in the dispensing fee (i.e., compounding)
- Provide a receipt that includes the dispensing fee, the drug cost and the total price of the prescription dispensed"

Rationale: The existing requirements for dispensing human prescriptions are to be applied for animal prescriptions, which is not explicitly stated in the *Drug Interchangeability and Dispensing Fee Act* or College policies and guidelines.

*** 19. Please rate your level of agreement with these expectations.**

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
The expectations are clear	☐	☐	☐	☐	☐
The expectations are reasonable	☐	☐	☐	☐	☐
The expectations are achievable	☐	☐	☐	☐	☐

If you disagree or strongly disagree, please explain why

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20. Do you anticipate requiring further guidance from the College to implement the policy?

☐ Yes

☐ No

☐ Unsure

Other (please specify)

21. Please share any additional comments about the draft Providing Pharmacy Services for Animals policy below.

Thank you for participating in the survey.

Your feedback will help us understand if the policy works as intended and inform what changes may be needed. Feedback provided through the survey will be published in the Board package as part of the overall analysis.

The College's Board of Directors will review the revisions and be asked to approve the policy at a future meeting.