

# Guide for pharmacists dispensing medicinal cannabis

## Background

Medicinal cannabis containing tetrahydrocannabinol (THC) is classified as a Schedule 8 (S8) medicine. Pharmacists must handle cannabis based products in the same manner as other S8 medicines.

At present, most cannabis based products are not on the Australian Register of Therapeutic Goods (ARTG) and are therefore subject to alternative supply pathways, such as the Therapeutic Goods Administration (TGA) [Special Access Scheme (SAS)](https://www.tga.gov.au/form/special-access-scheme) and [Authorised Prescriber Scheme (AP)](https://www.tga.gov.au/authorised-prescriber-scheme).

As for all S8 medicines, prescribers must comply with the [Schedule 8 Medicines Prescribing Code](https://ww2.health.wa.gov.au/~/media/Files/Corporate/general%20documents/medicines%20and%20poisons/Word/Schedule-8-Medicines-Prescribing-Code.docx).

[Detailed information about medicinal cannabis](https://ww2.health.wa.gov.au/Articles/A_E/Cannabis-based-products) for health professionals is available on the Department’s website. Patients can find [information about medicinal cannabis](https://healthywa.wa.gov.au/Articles/A_E/Cannabis) on the [Healthy WA](https://www.healthywa.wa.gov.au/) website.

## Steps when dispensing medicinal cannabis

* Once a medical practitioner has received the required approvals, they may write a prescription for medicinal cannabis for their patient.
* A patient can present their prescription to any pharmacy in Western Australia (WA) for dispensing. As with all S8 prescriptions, the pharmacist must verify the authenticity of the prescription, the identity of the person presenting the prescription and the bona fides of the prescriber.
* Where the prescriber’s practice address is not in WA, pharmacists should not dispense the prescription and should contact the Medicines and Poisons Regulation Branch for advice.
* Cannabis based products are available from wholesalers approved by the Commonwealth Office of Drug Control (ODC). [Details of manufacturers and wholesale suppliers](https://www.odc.gov.au/manufacturers-and-suppliers-medicinal-cannabis-products) are available on ODC website.
* For unregistered medicinal cannabis products, the pharmacy will need to provide the wholesaler with a copy of the TGA approval (SASA or AP), before the wholesaler can release the product. Prescribers will usually provide a copy of the TGA approval to the patient with their prescription. If not, the pharmacy will need to contact the prescriber for a copy. Note: the TGA approval maintains the patient’s privacy by only using patient initials.
* The pharmacist is not required to check whether the prescriber has an approval from the WA Department of Health. If this approval is provided, it must not be sent to the wholesaler as it includes the patient’s identity. Similarly, wholesalers should not be provided with a copy of the prescription.
* A pharmacy cannot hold stock of any unregistered cannabis based product in anticipation of receiving a patient specific TGA approval. Pharmacies can only order stock once details of the TGA approval for each patient are known.

## Storage and record keeping

* Pharmacies are required to store cannabis based products and maintain records in the same way as for other S4 and S8 medicines. Dispensing records for cannabidiol only products in S4 are not to be included in the monthly S8 report to the Department.
* Some medicinal cannabis products require refrigeration. Refrigerated storage for medicinal cannabis must be approved by the Department as an alternate storage arrangement for Schedule 8 medicines. Contact the [Medicines and Poisons Regulation Branch](https://ww2.health.wa.gov.au/Articles/N_R/Pharmaceutical-Services-Branch) to apply for refrigerated Schedule 8 medicines storage.
* When applying for approval of refrigerated storage for medicinal cannabis products, pharmacies need to consider how the proposed storage arrangements will provide sufficient security. A number of general principles should be applied as follows:

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| **Principle** | **Example** |
| **Deter:** to discourage a person from attempting to breach the security measures | 24 hour Closed Circuit Television (CCTV) surveillance, particularly monitoring access to the refrigerator in which medicinal cannabis is stored. |
| **Delay:** making the breach of security more difficult or slower, thereby allowing a response to occur | Refrigerator is locked.  Refrigerator is securely fixed or tethered to the floor/wall or is inside a lockable room within the premises with restricted access and not visible to the public. |
| **Deny:** allowing access only to those who require it | Access restricted to pharmacists only. |
| **Detect:** allowing early detection of security breaches | Movement detectors linked to after hours security system, with immediate keyholder notification.  Regular review of CCTV footage. |
| **Defend:** actions taken to respond to a security breach | Policies and procedures to be followed if there is a breach of security. |

### More information

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