

CHANGE IN PHARMACY OWNERSHIP

Interpretation Guide

Last Revised August 2026

1. INTRODUCTION

A change in pharmacy ownership can occur through the sale of a pharmacy, the sale of shares in a pharmacy, or the sale of shares in a corporation that holds shares in a pharmacy. Pursuant to the [Pharmacy Act, 2024](#) and the [CPNL Bylaws](#), before an owner sells an interest in a pharmacy, an application to change the pharmacy's ownership must be jointly filed by the current owner, current pharmacist-in-charge, proposed new owner, and proposed new pharmacist-in-charge, if different (see section 2. for more information on the application process).

In some cases, a change in pharmacy ownership may require a new pharmacy licence to be issued (see sections 2.5, 3.1, and 3.2 for more information).

2. APPLICATION PROCESS

2.1 Prospective owners wishing to acquire a pharmacy in Newfoundland and Labrador must:

a) review all relevant Legislation, Standards and Guidelines, with particular attention to:

- sections 31-33 of the [Pharmacy Act, 2024](#);
- sections 6, 8, and 9 of the [Pharmacy Regulations, 2024](#);
- section 9 of the [CPNL Bylaws](#);
- [CPNL Standards of Pharmacy Operation – Community Pharmacy](#) or [Standards of Pharmacy Operation – Hospital Pharmacy](#) (as applicable); and
- all [CPNL Standards of Practice](#); and

b) determine a proposed pharmacist-in-charge (if different from the current pharmacist-in-charge) in accordance with CPNL's [Requirements to be Designated Pharmacist-in-Charge of a Pharmacy](#).

- 2.2 At least 90 days before the proposed date of the change in pharmacy ownership, the current pharmacist-in-charge of the pharmacy must apply to change the ownership of the pharmacy in the CPNL [Pharmacy Portal](#).
- 2.3 The application for a change in pharmacy ownership must include all information required by the CPNL Bylaws and CPNL's [Pharmacy Owner Information Interpretation Guide](#).
- 2.4 Once an application for a change in pharmacy ownership has been submitted and all required documentation received, the application will be reviewed, and the proposed pharmacist-in-charge will be notified of the decision by email.

3. NEW PHARMACY LICENCE REQUIREMENTS

- 3.1 A new pharmacy licence is not always required, but is in the following cases:
 - a) Sale of the pharmacy;
 - b) Sale of shares in the pharmacy, where the pharmacy owner is a non-publicly traded corporation, that will result in a change in individuals with significant control;
 - c) A merger or amalgamation which impacts the ownership of shares in the pharmacy that will result in a change in individuals with significant control;
 - d) Sales of shares in the pharmacy, where the pharmacy owner is a partnership, that will result in a change of individuals with significant control; or
 - e) Sale of shares of a corporation that holds shares in a pharmacy that will result in a change of individuals with significant control.
- 3.2 When a new pharmacy licence is required, after the change in ownership application has been approved, the pharmacist-in-charge must log in to the Pharmacy Portal and pay the outstanding invoice for the Annual Licensing Fee, as per the current CPNL *Schedule of Fees*. Once this invoice has been paid, three weeks prior to the scheduled date of the change, CPNL will provide the pharmacist-in-charge with a new pharmacy licence number.
- 3.3 CPNL does not proactively inform third party payers that an *Application for a Change in Pharmacy Ownership* has been received. However, CPNL will verify receipt of an application if an agent from a third party payer contacts the Board as part of their provider agreement validation process.
- 3.4 The pharmacist-in-charge should contact Newfoundland and Labrador Health Services Digital Health at the earliest opportunity to advise them of the ownership and licence change and determine if there are any actions related to the Pharmacy Network connection. The

connection to the electronic health record must not be disrupted during the ownership change process.

- 3.5 When a new pharmacy licence is required, all record keeping requirements for the disposition of controlled substances must be completed.
- The selling pharmacy's records related to purchase, sale, and disposal must be retained for a minimum of two years.
 - The selling pharmacy's pharmacist-in-charge must perform a physical inventory count of all controlled substances and reconcile it against the perpetual inventory record before the change in ownership occurs. Any unreconciled discrepancies must be appropriately reported to the Government of Canada Office of Controlled Substances and CPNL prior to the changeover.
 - A copy of the reconciled inventory, signed by both the selling and acquiring pharmacist-in-charge (if different), must be kept in the acquiring pharmacy's controlled substances inventory records.
- 3.6 If the change of ownership is also associated with a change in the operating name of the pharmacy, the pharmacist-in-charge of the selling pharmacy must ensure that all interior and exterior signage, advertising, documents, and any other materials with the pharmacy's trading name is removed from the premises at the time of closure.
- 3.7 The pharmacist-in-charge must contact CPNL on the scheduled date of the ownership change to confirm that the change was completed. Once it has been confirmed by the pharmacist-in-charge that the change in ownership has occurred, the current pharmacy licence will be inactivated, a new pharmacy licence will be issued, and the pharmacy information will be updated on the CPNL Public Register.
- 3.8 The pharmacist-in-charge of the newly acquired pharmacy should complete a *Community Pharmacy Self-Assessment Form* to ensure the pharmacy continues to meet regulatory requirements. Pharmacists-in-charge and pharmacy owners are expected to proactively address any areas of non-compliance.