

Dear _____,

I am demanding that Health Canada stop regulating natural products with ever-stricter drug-style regulations.

The *Food and Drugs Act* defines “drug” so broadly that it includes everything used for a therapeutic purpose. The Act also makes it illegal to sell any drug without prior Health Canada permission in the form of a licence. This creates the legal and philosophical reality that anything used for a therapeutic purpose is illegal. The exception to this legal reality are the products that Health Canada grants permission to be used. You have created this reality where the only treatments Canadians are allowed to access is determined by Health Canada bureaucrats and not by Canadians themselves.

This legal structure limiting us to Health Canada bureaucrat-approved drugs can make sense for chemical drugs which carry a very high risk profile and which cause a large number of deaths a year. This legal structure does not make sense for natural health products which are so safe and effective that the real danger to Canadians is Health Canada restricting them.

You would not be willing to give up a single freedom to be protected from lightning strikes. Neither am I. We are 14 times more likely to be killed by lightning than to be killed by a natural health product. Fourteen times! Lightning is so much more dangerous to us than the whole natural health product industry that is not even fair to compare the risks of the two.

So, if you and I would not give up any freedom to be protected from lightning, why are you and Health Canada telling Canadians to give up our freedom to access natural health products in the name of safety? When you and Health Canada tell us that we need ever-stricter regulation of natural health products to protect us from harm it is so far from the truth that it can only be called what it is, **a lie**.

To make the lie of harm sound convincing, Health Canada never balances the alleged “risk” against the benefits of natural health products. This is shameful. A large number of Canadians are only alive today because of natural health products. A large number of Canadians have quality of life because they successfully manage serious health conditions with natural health products. This is why natural products and natural health practitioners are so popular.

It is wrong for Health Canada bureaucrats like you to restrict natural health products by regulating them with chemical-drug-style regulations that are becoming stricter and stricter. And I am demanding that you stop.

In 2008 Health Canada tried to impose the powers and penalties later found in Vanessa’s Law (S.C. 2014, c.24) on natural health products. This was defeated by one of the largest citizen rebellions in our history. You and Health Canada know the citizens do not want Vanessa’s Law to apply to natural products. But you and Health Canada just pulled a fast one on us. You snuck into the Budget Bill changes to apply Vanessa’s Law to natural products (Bill C-47 sections 500-504). I did not notice and now it is law. I need you to have sections 500-504 repealed. These powers and penalties are completely inappropriate for products that are less of a risk to us than lightning is. These powers and penalties will be used to destroy

and terrify producers and practitioners that are saving lives and alleviating suffering. You should be ashamed.

Health Canada has also published in the *Canada Gazette* a Notice of an intention to begin charging natural health businesses dramatic new fees for site and product licensing. This is to support Health Canada expanding its enforcement branch to enforce stricter regulatory requirements on the natural health community and to censor truthful information.

The new fees will drive many small and medium natural health product producers out of business. You and I will lose access to those products. The new fees will drive the prices of natural products higher as the producers that remain will have to raise prices to stay viable. This takes away natural products from poor and disadvantaged Canadians who can no longer afford them. I am calling on you to stop these new fees.

You also have to stop the relentless censorship. Health Canada bureaucrats like you say that the only information that can be shared about a natural product's efficacy is the Health Canada approved label claim. And Health Canada deliberately limits label claims to meaningless structure-function claims such as "Supports this" or "Supports that". Producers and practitioners who advertise truthful health information about a product are subject to Health Canada censorship tactics including criminal charges. And with you sneaking sections 500-504 into Bill C-47, the maximum fines just increased from \$5,000 to \$5,000,000. No practitioner or producer can withstand such fines. Censorship will increase and ordinary Canadians will lose access to effective natural products because they cannot be told the truth about them. A product that can help you does not exist for you if you cannot be told it can help you.

These two changes are just two parts of the Self-Care Framework which are being imposed on us. Upcoming steps in the Self-Care Framework include:

- Restricting claims for products to minor conditions for which a person would not seek the advice of a health care practitioner licensed by a province, such as Naturopathic Doctors, Traditional Chinese Medicine practitioners, etc. These practitioners will lose the products they use to help us and we will lose them because they will no longer be able to help us.
- Requiring the same levels of evidence for natural health products and chemical drugs.

Harmonizing the evidence standards will result in the loss of a large number of natural health products. Currently, traditional use evidence can be used to support efficacy claims for natural products. In some traditions, such as the Traditional Chinese Medicine practitioners, there are thousands of years of robust traditional use evidence. When the Standing Committee on Health held extensive consultations to determine how to best regulate natural products they were clear:

1. Natural health products should not be regulated like chemical drugs, and
2. Traditional use evidence needs to be allowed for efficacy claims.

You need to read the Standing Committee on health Report *Natural Products: a New Vision* found at <https://www.ourcommons.ca/DocumentViewer/en/36-1/HEAL/report-2>.

I need you to stop the Self-Care Framework now.

I am fed up with Health Canada bureaucrats like you over-regulating natural products. I am fed up with natural health products being regulated like they were chemical drugs. I am fed up with losing access to effective natural health products. I am angry about the lies that we need to be protected. I am angry about Health Canada sneaking changes into the Budget Bill. I want you to solve this now.

So that I am clear, I am asking you to protect your family and my family by:

1. Getting sections 500-504 of Bill C-47 repealed;
2. Stopping cost recovery on natural health product businesses;
3. Stopping the Self-Care Framework, and
4. De-regulating natural health products.

I need you to educate yourself so that you can protect us. Please read:

- the NHPPA Discussion Paper on these changes found at https://nhppa.org/?page_id=21833;
- the Standing Committee on Health Report *Natural Products: a New Vision* found at <https://www.ourcommons.ca/DocumentViewer/en/36-1/HEAL/report-2>, and
- the NHPPA Discussion Paper on the origins of the Self-Care Framework found at: https://nhppa.org/?page_id=15963.

I am expecting you to respond with the progress you are making on these four things.

I appreciate that this letter was not written by me, but I am sending it because I agree with it and I want you to work for us now.

Respectfully yours,

Signed

Dated