

Dear Right Honourable / Honourable/ MP \_\_\_\_\_

Cc: Minister of Health, Ginette Petitpas Taylor; Simon Kennedy, Deputy Minister of Health; Pierre Sabourin, Assistant Deputy Minister, Health Canada; Paul Glover, Associate Deputy Minister of Health; Director General NNHPD, Manon Bombardier;

As a Canadian citizen who pays our bureaucrats' salaries, **I want Health Canada's (HC's) new proposals for regulating Natural Health Products, (NHPs.) stopped!** This regulatory initiative is called the Self-Care Framework, and the only benefactor will be the pharmaceutical industry. Ignoring massive protests, this is HC's third attempt to regulate NHPs under the same umbrella as chemical pharmaceuticals. As with both previous attempts, their motives are underhanded and disingenuous.

Further, please amend Bill C-17, (Vanessa's Law dealing with dangerous drugs), to include the definition of a Natural Health Product within the text of the bill, rather than simply stating that NHPs are exempted from the Act "...as defined in the Natural Health Product Regulations". The fact is if HC's new Self-Care Framework is enacted, the NHP Regulations will cease to exist, and NHP companies will be subject to the same \$5 million dollar fines, and other penalties as chemical pharmaceuticals. Is this appropriate for selling NHPs that have never killed a Canadian? Is this a means of cost recovery through administrative penalties, or is it simply meant as a "big stick" to frighten the NHP industry into strict compliance... whilst selling products like Turmeric, Parsley and Garlic that have been part of our food supply for millennia!

In 1997 Parliament and the Minister of Health started a seven-year process aimed at achieving the best possible regulation of NHPs. This lead to the current NHP Regulations, which started in 2004. Yet, they were only fully implemented in 2013. In 16 years how many BILLIONS of taxpayers' money was spent getting them into place? Yet, only three years later, in 2016, HC proposed redoing them entirely! **Does this make any sense?**

The Canadian death toll from NHPs before the Regulations started was ZERO! After all the billions spent, the death toll is still ZERO! How can HC justify spending still more taxpayers' dollars? HC says it is all for safety and in the name of "modernization", when we already have the most expensive, most modern, best regulations in the world! And this is before considering all the billions of dollars that have been spent by the natural product industry complying with the current regulations.

Members of the Canadian Health Food Association were informed by the Directorate that is *supposed* to be regulating NHP's (i.e. the NNHPD), that they didn't even come-up with the proposals. Rather that they were simply handed to them by a committee of senior management and told to "make it happen." Subsequent extensive 'Access to Information Requests' to find out who wrote the new NHP Proposals, when finally produced, were largely redacted (blacked-out). **So what is Health Canada trying to hide?**

Further, it was passed on that the reason the proposals haven't been enacted yet is because HC doesn't want it to become an election issue! If they are doing nothing wrong, why would they be concerned? Yet, they have been clear that after the next election, with the new MPs in disarray, they will put it through! **This is unacceptable!**

***The real issue isn't safety, it's business...transnational business!*** HC is proposing to create 3 NHP tiers determined according to "risk levels". The lowest risk category would include things like vitamins and minerals, and would be unregulated. This would allow a flood of untested and questionable NHPs from the U.S. to enter the Canadian market. So, just three years after fully implementing a sixteen year process, HC is proposing to abandon their primary stated goal, i.e. "to ensure NHPs that are safe, effective, and of high quality".

On the other hand, approval of NHPs placed in the "highest risk" category for serious conditions will require clinical trials. Who has the money for that? The pharmaceutical industry, which is running out of drugs, and has turned to patenting constituents from natural substances instead! Yet, since they cannot patent the natural substances themselves, they have to rely on weak "use-patents". Yet these do them little good with comparable products on the market. So HC is pushing for a new scheme to bolster their protection.

HC says that the new proposals are simply asking NHPs to prove their claims, when in reality they *already have to* prove their claims, as per the NHP regulations. Many thousands of claims have been vetted and approved by

HC itself! What the agency is actually saying is that regardless of how many independent peer-reviewed studies there are for an NHP, and regardless of how innocuous it is, if the NHP is being used for a diagnosable disease, then a company's own clinical trials will be required...even if there are 30,000 independent studies for it! This doesn't protect anyone, it just makes NHPs more costly, which is also part of HCs plan...to help the pharmaceutical companies skyrocket the price of the new natural drugs.

Please honor what Parliament already spent so much time creating, which I have already paid for via my taxes, and uphold the current Natural Health Product Regulations. Please reply to my concerns in writing. Thank-you!

Signed \_\_\_\_\_ Print name \_\_\_\_\_

Date \_\_\_\_\_ Constituency \_\_\_\_\_

Address \_\_\_\_\_

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**Additional Comments/Questions:**

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