

MP Talking Points: Health Canada's Proposed Fees for Natural Health Products

The below reflects key CAND approved talking points that can be leveraged when speaking with MPs regarding Health Canada's proposed fees for natural health products.

Overview

Health Canada recently announced a consultation on proposed fees for natural health products. The fees are being proposed as part of regulatory activities to recover a portion of the costs of the NNHPD's regulatory activities, which to this point have been publicly funded. Health Canada has been charging fees for other health products, such as drugs and medical devices since the 1990's. The Proposal is intended to bring NHPs in line with the fees charged for the other health products. The proposal can be read here: [Proposed fees for natural health products.](#)

If implemented as proposed the fees will have a significant negative impact on everyone involved in the natural health product sector including naturopathic doctors and other health care practitioners who use NHPs daily to safely and effectively treat their patients.

The Practice of Naturopathic Medicine and Naturopathic Doctors

- Naturopathic Doctors (NDs) are primary care providers with a minimum of 7 years of post-secondary education.
- NDs focus on health promotion and disease prevention by treating the whole person, looking at the overall health of a patient rather than solely addressing symptoms.
- The philosophy of naturopathic medicine includes stimulating the healing power of the body and treating the underlying or root cause of disease.
- NDs are leaders in natural health care with extensive knowledge and training in the use of all natural health products, including those regulated by the Natural Health Products Directorate.
- Access to all natural health products is critical to ensuring NDs can continue to treat their patients safely and effectively.

Concerns Regarding Fees

- Due to the pandemic and supply chain and other issues, the costs of natural health products have already increased by up to 20 percent per product.
- Due to supply issues for NHP manufacturers, some products have already been removed from the market.
- NDs share a concern that the proposed fees will result in significant price increases and more products being taken off the market, products that many patients rely on daily to manage their health concerns.
- Increased costs will affect NDs who, as small business owners, may no longer be able to afford the increased costs to purchase products to have available in clinic for patients. This is of particular concern for patients in rural areas where access to products is limited.
- Patients must pay out of pocket for NHPs as neither the publicly funded health care system or third party insurers cover them. The proposed fees will have the inadvertent result of pricing the products they rely on to manage their health out of their reach.

Patient Protection

- In choosing to see a Naturopathic Doctor, patients have demonstrated their desire to take an active role in their health care through the use of natural therapies and natural health products.
- The CAND and its affiliate NDs support regulations that ensure the products that are recommended to patients are safe, effective and of high quality.

- If the proposed fees are implemented, they have the potential to undermine the practice of naturopathic medicine. This will happen by limiting access to the therapeutics NDs use safely and effectively every day, negatively impacting the naturopathic medical care NDs provide for hundreds of thousands of patients. Most importantly, patients' health will be at risk.