



May 24, 2024

Stephen Norman
Director General
Natural and Non-prescription Health Products Directorate
Health Products and Food Branch
Health Canada
250 Lanark Avenue
Address Locator 2002B
Ottawa, Ontario

Re: Consultation on Revised Proposed Fees for Natural Health Products (NHPs).

Dear Mr. Norman,

The Canadian Association of Naturopathic Doctors (CAND) appreciates all of the work undertaken in the preparation of the revisions to the Proposed Fees for Natural Health Products, and the time spent during the Engagement Session March 27, 2024 to explain the revisions. We are pleased to see the reduction in the fees and support the seven year phase in period. However our concerns regarding the impact on Naturopathic Doctors and their patients remain.

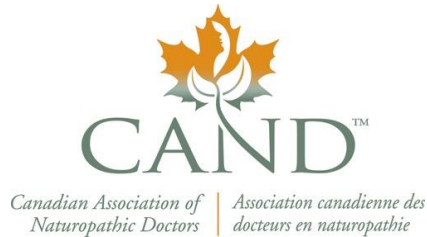
NDs are leaders in natural health care with extensive knowledge and training in the use of Natural Health Products (NHPs). Access to all NHPs is critical to ensure NDs can continue to treat their patients safely and effectively.

It is the opinion of the CAND that even with the revisions the proposed fees will have a significant and negative impact on the ability of Naturopathic Doctors (ND) to treat their patients as manufacturers will discontinue low volume practitioner focused products/product lines. Naturopathic doctors have been faced with price and supply issues since the beginning of the COVID-19 pandemic in 2020. On average product prices have already increased by up to 25 percent, some products have been on backorder for many months or have already been discontinued. Health Canada's proposed fees will only exacerbate the existing problems.

Naturopathic doctors rely on products manufactured by professional line companies, who manufacture practitioner focused product lines, rather than publicly available retail lines. The professional line companies have notified NDs that with the advent of cost recovery they will have no choice but to further increase the cost of products to practitioners or, eliminate

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products or products lines with low sales volumes. Manufacturers have also advised that as a result of the proposed fees some products will no longer be available once stock has been depleted. Unfortunately, we expect that this will become more commonplace once cost recovery is implemented. Once a product/product line is removed from the market it does not return leaving NDs to scramble to find acceptable alternatives should they even exist. Patient's health will be compromised. We recommend Health Canada consult with professional line manufacturers directly and consider further fee mitigation for those companies to ensure access to the products essential for NDs and other health care practitioners in the safe, effective treatment of their patients.

We do not know the effect of the proposed fees on patients as a cost benefit analysis of the impact of the costs to the consumer has not been provided. While those in attendance at the Engagement Session were advised that a cost benefit analysis would be included in Gazette II we request the analysis be provided to stakeholders at this time to enable us to conduct a more thorough assessment and to fully understand the impact on patients/consumers.

As small business owners Naturopathic Doctors will be further affected by the proposed increased costs as they 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 NDs treating patients in rural areas where access to product(s) is limited.

When patients choose to see a Naturopathic Doctor, they do so because they want to take an active role in their health care through the use of natural therapies and natural health products. The Canadian Association of Naturopathic Doctors, its members and its affiliate ND organizations support regulations that ensure NHPs are safe, effective and of high quality. However, the CAND believes that if Health Canada's fees on NHPs are implemented as proposed, they will undermine the practice of naturopathic medicine.

This will happen by:

- Eliminating or limiting access to the NHPs that NDs use therapeutically, safely and effectively every day;
- Negatively impacting the naturopathic medical care NDs provide for Canadians from coast to coast to coast.

Canadians have freedom of choice in health care. Naturopathic Doctors across the country serve Canadians who seek a more holistic approach to health promotion and disease prevention. Health Canada's *Proposed Fees for Natural Health Products* will result in Canadians no longer having access to the products they need even if they have chosen to seek out naturopathic care. This could be viewed as an infringement on every Canadian's enshrined right to choose and access the type of health care they wish to receive.



*Canadian Association of
Naturopathic Doctors* | *Association canadienne des
docteurs en naturopathie*

The CAND appreciates the opportunity to participate in this consultation and is available to answer any questions or discuss its position on NHPs with Health Canada at any time. Please do not hesitate to contact Shawn O'Reilly, the Executive Director and Director of Government Relations at soreilly@cant.ca or by phone at 416-496-8633 ext. 325.

Sincerely,

Shawn O'Reilly (she/her)
Executive Director, Director of Government Relations
The Canadian Association of Naturopathic Doctors