Dear Right Honourable / Honourable/ **MP** _____

Cc: Prime Minister, Right Honourable Justin Trudeau; Minister of Health, Honourable Jane Philpott; Director General NNHPD, Manon Bombardier; Director General TPD, Marion Law

Please prevent the gazetting of Health Canada's new proposals for Natural Health Products (NHPs), (see: https://www.canada.ca/en/health-canada/programs/consultation- regulation-self- care-products/full-report.html), and **re-separate** the Health Canada (HC) directorates that regulate over-the-counter (OTC) drugs and NHPs, as was directed by the Standing Committee On Health in their multi-year review of the subject.

HC *claims* they combined the departments to save money. So, why did they subsequently create an *entire new directorate*, the Marketed Health Products Directorate, (MHPD), just to police the claims of NHPs that have killed zero Canadians in 60 years? HC's degree of concern about NHPs is completely disproportional to their safety levels. This is because *the real issue isn't safety, it's business!* i.e. Market share for the pharmaceutical industry, for whom the Therapeutic Products Directorate (TPD) within HC acts as a strategic watchdog.

Accordingly, HC is pushing to waste the vast amounts of money and resources already spent on the NHP Regs. The process started in 1997, involved a full Parliamentary investigation, countless meetings of the Standing Committee on Health, an Expert Advisory Committee, and a Transition Team to prevent derailment. But, the TPD intervened. Instead of creating a truly distinct class for NHPs as was recommended by the Standing Committee, NHPs were placed as a ***subclass*** of DRUGS, and the NHP Regs started in 2004.

As "DRUGS", each NHP is *forced* to make a claim, and support it with either scientific evidence, or evidence of traditional use for at least 50 years. HC's assumption was that few NHPs would be able to produce such evidence, and most would be knocked off the market. But, as science for NHPs continued to mount, thousands of NHP claims were vetted and approved by HC's Natural Health Products Directorate (NHPD). The backlog of NHP applications was only fully processed in 2013. Several were approved for medical conditions.

This was/is unacceptable to the pharmaceutical industry, which is running out of drugs, and has turned to patenting constituents from natural substances. Yet, since they cannot patent the natural substances themselves, they have to rely on weak use-patents. So the TPD is pushing for a new scheme to bolster their protection.

HC is proposing to create 3 NHP tiers to be determined according to "risk levels". The lowest risk category would include things like vitamins and minerals, and would be *unregulated*, which would allow a flood of untested and questionable NHPs from the U.S. to enter the Canadian market. So, just three years following full implementation of the Regulations, HC wants to abandon their primary stated goal, i.e. *"to ensure NHPs that are safe, effective, and of high quality"*. Does this make sense to you? This is doublespeak.

On the other hand, NHPs will be placed in the "highest risk" level based on the seriousness of the condition that their claims address. In other words, based on what they are "*used*" for. This is totally invalid! Just because you use an NHP for a condition doesn't mean it is risky! By this logic, eating cinnamon on your porridge for flavor isn't dangerous, but consuming the same amount of cinnamon at the same meal in a capsule for high blood sugar is. Yet, it's the same cinnamon! What you used it for didn't change it, or its risk level.

Control of *safe* substances based on what you ***use*** them for, instead of risks they may pose is State censorship. It is a scheme that protects pharmaceutical dominion over any substance used to treat disease.

HC *claims* that they are simply asking NHPs to prove their claims, when in reality they *already have to* prove their claims, as per the NHP regulations. What HC is actually proposing 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 that support a claim! This doesn't protect anyone, it just makes NHPs more costly.

HC *claims* that they are committed to "modernizing" our regulations. Yet, with mandatory Good Manufacturing Practices, testing of ingredients, and stiff vetting of NHP claims, the Canadian NHP regulations are the best and most modern and in the world… a sentiment recently shared by 26 of 27 countries at a Sept/16 EU meeting.

As part of their proclaimed “modernization” HC is proposing dramatic increases in fines. Is this appropriate for selling NHPs that have never killed a Canadian? Is this a means of cost recovery, or is it simply meant as a “big stick” to frighten the NHP industry into strict compliance, while being policed and censored by the MHPD for selling products like Turmeric, Parsley and Garlic that have been part of our food supply for millennia!

Please honor what Parliament already spent so much time creating, and that I have already paid for via my taxes, for the government to undertake. The MPs are the only group with the legal power to prevent this purely bureaucratic and pharmaceutical agenda. Please help me by doing so, and replying to my concerns in writing. Thank-you!

Signed_____ Print name_____

Date_____ Constituency_____

Address_____

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