

LETTER TO NATURAL HEALTH PRODUCT MANUFACTURERS

Dear Natural Health Product Manufacturer,

I am writing to bring to your attention a matter of utmost significance that will impact your business and the choices available to you and your customers.

We, at the Natural Health Product Protection Association (NHPPA), are leading a nationwide campaign to stop the Self-Care Framework, which when fully implemented, will result in the removal of countless natural health products (NHPs) and will increase prices of the products that remain on the Canadian market.

We invite you to become a community ambassador, using your influence to champion NHPPA's important goals and empowering your community to get involved in this campaign.

Can your business survive?

- Decreased ability to license NHPs, including restricted licensing of innovative multiingredient products
- Increased prices on remaining NHPs, which will reduce your potential customer base
- Restricted to discussing and advertising the Health-Canada-approved label claims of natural health products, or else face fines up to \$5,000,000 per day
- Mounting cost recovery fees that are scheduled to come into effect, in part, in 2025

Key issues:

- Stricter regulations and new fees imposed on NHP manufacturers like you will increase
 prices and cause the loss of products as manufacturers will be unable or unwilling to
 afford licensing.
- 2. **Losing the right to use traditional use evidence** for NHP licences will take away products. For example, "ginger is traditionally used to treat nausea" would no longer be an accepted label claim.
- 3. **Restricting NHPs to over-the-counter uses will take away products.** Under Health Canada's Self-Care Framework label claims for NHPs are restricted to conditions for which you would not seek the advice of a health care practitioner licensed by the province.
- 4. **Increased Health Canada censorship will prevent truthful advertising** by both manufacturers like yourself and health food stores because you will be limited to communicating product uses based on the approved label claims.
- 5. **New \$5,000,000 a day fines** can be imposed for violating the laws on NHPs (such as selling a product with improper labelling or communicating product uses outside of the label claims). Prior to June 22, 2023, the maximum fine you faced for violating the laws on NHPs was \$5,000. Now it is \$5,000,000 a day. These fines apply to all directors and employees within NHP businesses, whereas they used to only apply to corporations. How could any of us withstand \$5,000,000 per day fines?

Learn more:

For a detailed analysis, read the NHPPA **Discussion Paper on 2023 Health Canada Initiatives**: bit.ly/DiscussionPaper2023HC

NHPPA Campaign Goals:

NHPPA is actively working with NHP stakeholders nationwide, including practitioners, retailers, and manufacturers like yourself to protect our access to natural health products.

Our goals are to:

- 1. Repeal sections 500-504 of Bill C-47
- 2. Stop Cost Recovery on NHP businesses
- 3. Stop the Self-Care Framework
- 4. Enact the Charter of Health Freedom to ensure fair regulations of NHPs
- 5. Send a clear message to Health Canada to stop over-regulating NHPs

IMMEDIATE ACTION YOU CAN TAKE:

Your customers have a vested interest in protecting their access to the products you sell. Joining **NHPPA's Manufacturer's Network** will help you educate your customers and support them to take collective action for positive change.

Go to nhppa.org/manufacturers and fill out the form to receive your Manufacturer Action Kit that will support you in educating and activating your customers and community.

On behalf of the NHPPA team, we sincerely appreciate your efforts as a natural health practitioner. Your role in preserving access to natural health products and supporting the right of Canadians to access NHPs is vital. Thank you for all you do to protect the health of Canadians.

Sincerely,

Shawn Buckley NHPPA President & Constitutional Lawyer

PS. If you haven't already, you are also encouraged to **invite fellow manufacturers** to join NHPPA's Manufacturer Network. We need as many natural health product manufacturers and their customers to get involved in this movement as possible!

Everything you need to get involved and protect your business is available here: https://nhppa.org/manufacturers