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May 24, 2024

Subject: Feedback on Proposed Bill C47 Changes to Manufacturing Processes of Natural Health Products

Dear Mr. Stephen Norman,

Further to our letter dated August 22, 2023.

Thank you for the opportunity to provide comments on the proposed changes under Bill C47 related to Natural Health Products. Health Canada and regulatory colleges share similar principles in their oversight of health care to ensure safety and effectiveness for patients. To that end, it is important to recognize that **product safety is relevant only if those products remain accessible to those who need them. Patient outcomes depend on access to both practitioners and products.**

Unintended consequences of the actions of Health Canada will be felt by patients who will no longer have access to homeopathic remedies. These patients' health and wellbeing will be severely affected. This will impact the existing healthcare system with an increase in costs and wait times. There will also be an economic impact on the homeopathy profession. In addition, the manufacturing/distribution industry could potentially be driven out of business.

With full recognition of the difference between CHO and Health Canada's jurisdiction and mandate, since its inception in 2009, CHO has not received complaints about

harm to patients from homeopaths because of the consequences of taking homeopathic remedies which are manufactured under strict quality controls. In support of the proposed changes Health Canada does not provide any evidence of harm from homeopathic remedies and fails to demonstrate how more rigorous control of NHPs through the imposition of licensing fees will benefit the public or make products safer.

The CHO regulates homeopaths in the public interest. It ensures that the public has access to well-trained ethical homeopaths subject to CHO regulations, bylaws, standards and guidelines. The CHO views public protection and access to care as its most important mandates. It is a matter of the public's freedom of choice that allows homeopaths to practice their profession and provide health-care services.

### **Patient Choice and Impact of Profession in Ontario**

There are 440 homeopaths in Ontario. According to the most recent practice data available (2021-2022), these practitioners have provided annually approximately 250,000 patient visits for both acute and chronic care. Taken over the years since proclamation in 2015, homeopaths have provided treatment for an estimated 2.1 million patient visits. In effect, homeopaths have taken substantial pressure off the health-care system in Ontario. Canada-wide, these numbers, we estimate, would be more than double at 4,000,000 visits. It is important to recognize the contributions of homeopaths to the healthcare system in terms of helping their patients and relieving congestion and wait lines for medical doctors, medical specialists, Emergency Room visits, and hospital space shortages.

Homeopaths provide services without direct cost to the Ontario provincial health-care system since patients are directly responsible for these costs. We are aware that the current health-care systems in Ontario and the rest of Canada are strained to provide services in a timely manner. The public is not being well served when the wait times are lengthy because the impact on health outcomes can be significant. Delay in service is detrimental to one's health and often leads to more invasive and costly care with uncertain outcomes.

Public protection provides a level of confidence that homeopaths are capable of and can provide effective treatment for patients for both acute and chronic conditions in an efficacious and gentle manner at relatively low cost.

## **Use of Homeopathy Worldwide**

Homeopathy is an accepted and embraced form of health care in many parts of the globe. Furthermore, homeopathy and homeopathic products are recognized by governments world-wide as safe and effective. It is estimated that 300,000 homeopaths worldwide provide healthcare to more than 500 million patients. In Ontario, there are a number of visible cultural groups who have been accustomed to treatment by homeopaths in their home countries, and who continue to choose and receive homeopathic care in Ontario. Included within this group are religious groups who will only use homeopathy as their choice of healthcare. This impacts and reduces the strain on the broader health-care system. This is likely true for the rest of Canada as well.

According to a study conducted by Harris Interactive in 2022<sup>1</sup>, homeopathy has been used by more than 10.3 million Canadians. The main users of homeopathy in Canada are communities from Europe (France and Eastern Europe), South America (Mexico, Brazil, Argentina, Columbia) and of course from India, Pakistan, and Sri Lanka. The Harris survey revealed that 23% of Canadian consumers had used homeopathy because of failed conventional treatment, while 30% had used homeopathy for the treatment of chronic disease, and 35% for the treatment of a child.

## **Support for Homeopathic Products**

CHO understands that Health Canada regulates homeopathic products which are available in a variety of forms including “pellets, oral droplets, syrups, creams and ointments”. Most of the sources of these products come from plants, minerals, and animals. CHO also understands that Health Canada considers these products to be generally low risk. Currently these products are reviewed to ensure safety and that health claims reflect references found in Materia Medica, Pharmacopoeia, published texts, provings and clinical trials, and other references used in the practice of homeopathy.

Homeopathic products are available to the public in a variety of ways. In stores, the public can find over the counter (OTC) products with an eight-digit identifying DIN-HM number. The labels depicting homeopathic medicine/remedy/preparation, provide information regarding the OTC product including ingredients, usage, dosage,

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<sup>1</sup> Survey "Homeopathy: awareness and usage in Canada" final report – December 2022 - Harris interactive – on a representative national sample (1,050 people) of the Canadian population.

and cautions. Some OTCs will contain complementary ingredients designed to work together as complexes for general purposes such as “cough, cold and flu” and various other children’s ailments such as teething, and digestive problems. Stores often carry - single remedies which the public may purchase on the advice of a homeopath or based on published information regarding specific ailments in the treatment of acute and chronic disease.

Homeopaths prescribe “Nosodes” and “Sarcodes” regulated by Health Canada. These are not vaccine alternatives. They are used by homeopaths based on the health attributes of the product, and according to homeopathic product references (see above) utilized by the prescribing homeopath and based on a totality of symptoms.

### **High Potential for Loss of Access to Homeopathic Products by Homeopaths & Patients**

Access to competent homeopaths goes beyond professional knowledge and skill. It must also include access to homeopathic products which are currently defined as Natural Health Products (NHPs). Without the required natural health products needed to support care, homeopaths will be substantially limited in their ability to provide effective services to patients who seek their help. Under the proposed Bill C47 changes, registrants and patients may well encounter situations of no access to the most effective product or no access to product at all, as pressure is applied to manufacturers to meet elevated standards.

There is a risk to those patients who are currently under homeopathic care. Continuity of care may be vulnerable due to the potential loss of availability of specific homeopathic remedies. There are literally thousands of remedies in homeopathic pharmacopeia, and there are continually new remedies being manufactured. Given the costs of supporting individual remedies, there is real concern that the range of available remedies will shrink precipitously. If only the most popular remedies survive when changes to Bill C47 are implemented, patients in need of other remedies in the pharmacopeia will suffer devastating consequences. The impact of these changes will reverberate throughout the healthcare system further lengthening wait times and exacerbate impact on patients’ health and increase direct costs to the system.

Remedies and NHPs are cost effective for the public. Once a homeopath has assessed a patient, he/she then prescribes the most appropriate remedy to help the patient return to health. Homeopaths and their patients rely on NHPs. There are no alternatives products available with this system of medicine. All, including Health Canada, are worse off when the patient looks for other unproven products from unlicensed providers.

Homeopaths have the expertise and the right to compound<sup>2</sup> their medicines to treat their patients. The advent of Bill 47 may impact this practice by making certain raw materials or natural product availability unlawful. Here, too, patient care will be compromised.

### **Risk of Harm**

The risk of harm from homeopathic remedies is infinitesimal, while the risk of harm from all other medicines is real and can be measured. The proposed changes under Bill 47 create unnecessary and unfair barriers with no apparent benefit or risk mitigation to patients or the health care system. Many pharmaceutical products – while intended to heal and cure patients – can be lethal when used or dosed incorrectly or without medical oversight and supervision. These products demand higher standards of regulation and oversight by Health Canada. It is not unheard of for medical pharmaceuticals to have a harm rate (serious adverse effects or death) in the range of 1 to 10,000s users. This truth is acknowledged and accepted in the medical and pharmaceutical industries. This very high harm rate is not present with homeopathic remedies which do not include crude dosage of substances. They are diluted and potentized and carry no risk of harm to patients from properly prepared homeopathic remedies, whether these remedies are produced by companies that specialize in homeopathic or compounded by homeopaths for use by patients of their clinic.

The proposals currently referenced in Bill C47, sections 500-504, threaten to constrain the availability of homeopathic remedies and other necessary health products. Further obstacles to the supply of needed products will have a profound impact on patients and, in turn, on the health-care system more broadly, as publicly funded alternatives will have to take the place of the safe and cost-effective homeopathic care chosen by patients.

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<sup>2</sup> College of Homeopaths of Ontario Professional Practice [Standard 3: Compounding](#)

There is a high risk that manufacturers of homeopathic products will substantially reduce their product range or altogether cease their operations in Canada because of the onerous cost-recovery requirements that would force them to pay substantial fees for the right to sell homeopathic products.

As these proposals have come to light, the College has received messages of concern from patients and practitioners deeply worried about their ability to continue with care that has proven effective for them. Furthermore, homeopaths are reporting that their product orders from outside of Canada are being stopped at the border which may be in contravention of Health Canada's own policies.

While we have no argument with the ongoing pursuit of product safety and effectiveness, we would suggest that the fees proposed in Bill C47 could severely impact the availability of necessary products and thereby negatively affect the viability of the homeopathy profession and patient outcomes. We urge Health Canada to reconsider the current proposals – especially those impacting access to homeopathic remedies. There is a real danger that the result will have exactly the wrong impact on patient care and health outcomes.

Patient safety is a common goal. The College of Homeopaths of Ontario has been an active contributor to Health Canada's initiatives related to natural health products in the past, most recently related to product labelling. Health Canada must be sensitive to the needs of Canadians if patient safety and outcomes are to be protected.

Sincerely,

A handwritten signature in black ink, appearing to read "Basil Ziv", is placed over a light grey rectangular background.

Basil Ziv  
Registrar & CEO