



June 20th, 2019

CCHA Statement to the public:

In light of the regulatory changes being initiated by Health Canada (HC) through the Natural & Non-Prescription Health Directorate (NNHPD), the CCHA would like to inform the public of the CCHA's position in regards to this matter.

Over the last 2 years, the CCHA has been involved with the NNHPD regularly through in person Stakeholder meetings, webinars and letter communications. The CCHA is grateful to be maintaining it's long-standing relationship with Health Canada and appreciates the opportunity to be involved in these important discussions, as they greatly impact the Natural Health Product (NHP) industry, as well as natural health practitioners, including herbalists.

At the forefront, the CCHA represents and holds the interest of Canada's provincial Herbal Associations, as well as the practicing herbalists they represent, to protect and uphold the profession of herbal medicine in Canada. The main concerns that the CCHA continues to bring to the table in its relationship with the NNHPD are the following:

1. **Standards of Evidence & Traditional Claims**-Traditional claims remain equally as valid as scientific clinical trials when proving efficacy for a Natural Health Product (NHP). The Standing Committee of Health provided an elaborate reference document (HEAL Report, 1997) that is intended to guide all regulations in relation to NHPs.

In the HEAL Report it recommends: "That manufacturers of natural health products be allowed to make health claims, including structure and function claims relating to the human body, and treatment claims, and that Health Canada should assess these claims in a way that looks at types of evidence, such as professional consensus and traditional references, and not only at clinical trials (recommendations 19, 20, 21 and 22)".

The CCHA is working to protect these guidelines throughout this consultation process.

2. **Natural Health Product Compounding & Raw Materials Policies**- These policies allow professional herbalists, traditional Chinese medicine practitioners, homeopaths and naturopathic doctors to be exempt from the NHP Regulations when compounding preparations within a practitioner-client consultation context. It is imperative to ensure that these policies remain intact and unchanged and essential to ensure that the usage and importation of raw

medicinal plants and bulk compounding products will be permitted for herbalists' use in the future. While the NNHPD has not indicated during stakeholder meetings any intention of changing these policies, the CCHA continues to bring this topic up for discussion and has consistently asked for assurance to protect the interests of our profession.

- 3. Accessibility of Natural Health Products for Practitioners and Canadians-** While the CCHA does not represent herbal manufacturers, we continue to question and challenge any proposed changes that may decrease accessibility to products on the marketplace, raise prices and which could affect professional herbalists access to certain products & supplements, and thus decrease access for our clients. As far as we can see, the NNHPD isn't directly seeking to limit access or remove certain products from the market. The way accessibility would potentially decrease is through increased cost to small businesses, translating to higher costs to the consumer or small businesses going out of business.

This regulatory process is currently in Phase II of a 3-Phased process. In Phase III, the discussion around standards of evidence will begin and the CCHA looks forward to holding a seat at future Stakeholder meetings to come.

Herbalist Play a Valuable Role for Canadians within the Healthcare Framework

The CCHA believes strongly that professional herbalists play an important role in maintaining health and wellness for Canadians. The World Health Organization estimates that 50% of the global burden of disease is chronic illness. Here at home, chronic diseases are estimated to cost Canadians \$68 billion annually in direct healthcare costs and \$122 billion in productivity losses.

With a focus on prevention, addressing the root cause of illness while offering patient-centered care, herbalists relieve pressure off Canada's overly burdened medical system. Those Canadians seeking health and wellness practitioners and focusing on preventative medicine or wellness programs are likely to be healthier, incur fewer absentee days and reduce medical costs over their lifetimes. It is the CCHA's belief that herbalists play an important role within the context of preventative health and are a valuable resource to the current medical system for the Canadian population.

Thank you for your continued support of the CCHA in its endeavors!

If you find this issue to be important and want to support sending our board members to these meetings so we can continue our involvement with the NNHPD, please donate today!

To donate or to learn more about the CCHA, please visit our website: <https://herbalccha.org/>

The CCHA is a non-profit organization that represents herbal associations and professional herbal practitioners within Canada.