HANS

Canadian Natural Health Product Stakeholders Questionnaire
May 2019

Overview

In September of 2016, Health Canada published Consulting Canadians on the Regulation of Self Care Products in Canada, thereby launching a process of public and stakeholder consultation on their proposed replacement of existing regulation of non-prescription drugs, Natural Health Products (NHPs) and cosmetics. The consultations proposed a system by which products would be categorized as lower, medium, or higher-risk self-care products. Determination of category would depend on product claims and product ingredients. Low-risk self-care products would require no department review and would not be permitted to make any claims. Medium and higher-risk products would require application. Any health claims associated with the product would need to be supported by scientific "evidence" or "proof" through an approved monograph or Health Canada review. In addition to the classification system, Health Canada also expressed plans to exert more authority over recall provisions, product labeling and cost recovery processes (theirs).

The consultation process continued through 2017 with Health Canada holding a series of national public town halls, in addition to meeting with industry stakeholders and institutions across the country. Health Canada summarized the process and findings in this document: https://www.canada.ca/en/health-canada/topics/self-care-products/what-we-heard-product-labelling.html#a1

The original Health Canada strategy for implementation of NHP regulatory changes was supposed to happen in three phases, completing in 2020. Since the consultations completed, Health Canada has been reluctant to keep stakeholders fully informed. This lack of transparency is creating anxiety and mistrust among industry stakeholders. The public is largely unaware of the proposed changes.

Questions and Concerns That Potentially Impact Stakeholders

- Exactly what constitutes "scientific proof" or "scientific evidence"? There are various levels of evidence: which are acceptable? Is Health Canada expecting manufacturers to conduct clinical trials? Will they respect evidence previously presented as part of the current regulatory processes?
- Will these demands consider traditional medicine's (Traditional Chinese Medicine, Herbalism) existing and unique measurements of "proof" and "evidence".
- Is Health Canada respecting the traditional health modalities of a multi-cultural Canada?
- Will Health Canada bring in monetary penalties for small violations?
- Will Health Canada charge for licencing and licencing renewals?
- Could expanded Health Canada authority put unbearable stressors on small manufacturers, and consequently, distributors, retailers and ultimately consumer access?

Health Action Network Society (HANS)
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Name: _____ Email: _____

Industry/Area of Practice: _____

Do you have concerns about the current Health Canada NHP Regulatory Framework? If so, please describe.

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_____
_____
_____

Do you have concerns about the proposed Heath Canada NHP Regulatory Framework? If so, please describe.

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Do you believe the proposed NHP Regulatory Framework will have a positive or negative impact on NHP industry stakeholders (manufacturers, distributors, retailers, practitioners)?

_____
_____
_____
_____

Do you believe the proposed NHP Regulatory Framework will have a positive or negative impact on consumers (health freedom, product safety, informed consent)?

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Thank you for giving voice to this health freedom issue! If you have further comments, please send them to naida@hans.org.

Sincerely
Naida Geisler, General Manager
Health Action Network Society (HANS)

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