

Trevor Day, Committee Clerk
Standing Committee on Social Policy
Legislative Assembly of Ontario
Room 1405, Whitney Block
99 Wellesley Street West
Toronto, ON
M7A 1A2

Submission regarding Bill 171, Health System Improvements Act, 2006

I am writing on behalf of the Ontario Herbalists Association in regards to Bill 171, Health System Improvements Act, 2006, and specifically Section P outlining regulation of the new College of Naturopathy and Homeopathy.

Section 8. (3) states “No person other than a member shall hold himself or herself out as a person who is qualified to practice in Ontario as a naturopath or homeopath or in a specialty of naturopathy or homeopathy”.

The fact that the ‘specialities’ are undefined, leaves open the possibility that the new college may claim exclusivity in any area which they feel is part of naturopathic medicine, to the detriment of unregulated practitioners. The present Naturopathic Association is known to consider botanical/herbal medicine as a speciality, and therefore it is reasonable to suppose that this would be included in the defined specialities.

We would like to bring your attention to the numerous herbal medicine practitioners in the Province who may be affected by this. Many of the professional members of the Ontario Herbalists Association are among the best trained herbalists in the world, both Western and Ayurvedic, and they provide an increasingly important resource for community health. Newly qualified naturopathic practitioners would not, in fact, be eligible to become professional members of the OHA, as their herbal study hours fall far short of our minimum requirements.

Of additional concern is, Section 11: Regulations (“... The Council may make regulations...”) subsection (b): “...governing the use of prescribed therapies”, which raises some possible difficulties.

The HPRAC report ‘New Directions’ April 2006, p182 refers to a meeting with the NHPD where they advised of an interest in establishing a separate schedule for natural health products that they considered to be a higher risk:

“As stated at the Health Canada Symposium on herb/drug/food interactions February 9 & 10, 2006, the Natural Health Products Directorate (NHPD) is now considering the creation of a separate schedule for natural health products that are considered to be of higher risk. This is something the naturopathic profession has been advocating for since the inception of the regulations. There are botanical medicines and other natural health products that should only

be used under the advice and supervision of a health care professional who is educated and trained in their use."

Section 11, sub-section (b) of Bill 171, tends towards the likelihood that such a limitation of access may occur, again to the detriment of other to date unregulated, but well qualified practitioners.

The Ontario Herbalists Association strongly urges you to consider these concerns, and respectfully requests appropriate amendments to the Bill. It is essential that herbalists with so many years of training continue to be allowed to practice freely in the Province of Ontario.

We would further suggest that the "Drugless Practitioner's Act" be maintained as a possible vehicle to accommodate the regulation of smaller groups of natural health practitioners. With minor changes, it could be used as an appropriate 'stepping stone' to full regulation for other disciplines.

Sincerely,

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