

Canadian Society of Homeopaths

#101 - 1001 West Broadway, Unit 120, Vancouver, BC V6H 4E4
homeopathy@csoh.ca 604-803-9242

April 23, 2007

Trevor Day, Committee Clerk
Standing Committee on Social Policy
Room 1405, Whitney Block
Queen's Park, Toronto, ON M7A 1A2

Attention: Chairman Ernie Parsons
Vice-Chairman Khalil Ramal
Mr. Peter Fonseca
Mr. Kuldip Kular
Mr. Jeff Leal
Mr. Rosario Marchese
Mr. Bill Mauro
Mr. John O'Toole
Ms. Elizabeth Witmer

Dear Chairman Parsons and Vice-Chairman Ramal,

Re: Standing Committee Hearings on Bill 171

The Canadian Society of Homeopaths (CSH) is the largest national homeopathic registering association in Canada, representing over 400 Homeopaths and Students, over 220 of whom are or will be practicing in Ontario.

CSH Registered members are highly qualified professionals who must meet stringent educational standards; provide evidence of ongoing professional development; adhere to a professional code of ethics, conduct, and practice; and accept an accountability (grievance) procedure as a condition of maintaining their membership. The model is based on the well-established Society of Homeopaths in the UK.

Our association is committed to serving the public interest by establishing professional standards for homeopathy in Canada and unifying the profession. CSH is the only organization in Canada that is capable of unifying the profession because it is uniquely detached from any one particular school and therefore has no vested interest in promoting a particular curriculum. Five of the major homeopathic schools in Canada have trained large numbers of our membership, and others have been trained at several respected international schools.

Canadian Society of Homeopaths opposes the inclusion of homeopathy in Schedule P of Bill 171 and recommends that further consideration of the regulation of homeopathy be postponed until the profession can demonstrate that it is required.

We ask that Schedule P of Bill 171 be amended to remove any reference to homeopathy and that the government postpone a decision about regulation of homeopathy at this time.

The following outlines our concerns with Bill 171, Schedule P:

1. There is no consensus within the homeopathic community that the profession should be regulated at this time.

Contrary to the RHPA criteria for considering regulation of a health profession, there is no consensus within the homeopathic community in Ontario at this time regarding regulation. The profession is still fragmented, represented by competing and contradictory interests, and in need of time to grow in numbers and to develop networks for mutual cooperation and consensus building.

2. The HPRAC Report, *New Directions*, upon which this legislation is based, did not represent the homeopathic community on this issue.

The HPRAC process involved no formal consultation or collaboration with most of the homeopathic associations and schools that represent Ontario homeopaths and students. Information obtained was dominated by organizations promoting a minority point of view, which does not represent the views of the majority of the profession in Ontario and across Canada. Additionally, the requirements and concerns of rural and non-Toronto-based homeopaths were not properly represented. As a result, recommendations in the Report – most of which have been incorporated into Schedule P – reflect the viewpoint and interests of only those organizations and their affiliated schools.

The lack of broad consultation with representatives of the majority of the homeopathic community resulted in a one-sided and inaccurate report on the status of the profession, scope of practice, risk of harm, etc. Despite numerous attempts by associations and individuals to draw attention to the inaccuracies, distortions, and unsubstantiated statements contained in the initial application and subsequent HPRAC Report, the resulting legislation would create a situation that supports the minority views of the contributing organizations and schools.

3. Bill 171, Schedule P would establish a joint College of Naturopaths and Homeopaths that would regulate both professions. This is untenable for several reasons:

- Homeopathy and Naturopathy are two entirely different therapeutic systems, each built upon its own complete system of theory and practice. Neither profession should be involved in the regulation of the other.
- Naturopaths employ many therapies, including Homeopathy and Traditional Chinese Medicine. In order to avoid conflict of interest between competing professions, none of these overlapping modalities should be required to share the same College.
- A combined college would add to public confusion about the differences between Naturopathy and Homeopathy, as many do not realize that naturopaths use homeopathy as one of several therapies and homeopaths specialize in homeopathic medicine.

- Bill 171 reserves the title of “homeopath” for professional homeopaths, while at the same time reserving for naturopaths the title of “Naturopathic Doctor”. In essence, the Bill creates and enshrines a false disparity that paints professional homeopaths as less competent, even though standard naturopathic training in homeopathy is minimal. This structural flaw would inevitably create divisions in the College that would impair its proper functioning.
- There is no provision in the legislation to deal with fairness in electoral representation. The numbers of naturopaths in Ontario far outweigh the number of homeopaths, and therefore an elected council would not represent homeopaths. Even if provision were made to ensure equal numbers of naturopaths and homeopaths on the board, there would be no way to properly represent the many different approaches within the homeopathic profession, resulting in domination by those groups with more financial means.

The following outlines our concerns about regulation of homeopathy:

1. There is no significant risk of harm with homeopathy.

Risk of harm – another RHPA criteria for considering regulation of a profession – refers to circumstances in which it is reasonably foreseeable that serious bodily harm may result from the treatment or advice or from an omission by the practitioner. Although the HPRAC Report attempted to demonstrate examples of potential risk of harm with homeopathy, its arguments reveal a complete lack of understanding of the essential basis of homeopathy and the healing process. In fact, it was unable to provide accurate and convincing evidence that homeopathy poses a realistic and significant risk of either indirect or direct harm to the patient. Homeopathic medicines are recognized as safe by the Natural Health Products Directorate and by similar agencies around the world. In Canada, they have been widely available over the counter for decades without adverse effects.

2. Regulation would impose high additional costs on professional homeopaths, resulting in loss of livelihood for some and increased fees passed on to patients.

The high costs of maintaining a college and associated obligations would create an untenable burden on many part-time homeopaths, especially those in small and economically-depressed communities. A significant number of these would likely discontinue their practice of homeopathy, thus ending a source of livelihood for themselves, as well as reducing or eliminating public access to qualified homeopathic services in their communities. Regulated homeopaths would need to pass on their increased costs in the form of higher patient fees, which would impact the public paying for homeopathic treatment and those considering it for themselves or their family.

The impact of regulation on both practitioners and the public needs to be seriously considered before regulation is imposed on any profession. This is especially true of homeopathy, for which significant risk of harm has yet to be established.

In Conclusion:

We urge legislators to remove all references to homeopathy from Schedule P of Bill 171. In this way, Schedule P would establish the College of Naturopaths to regulate the naturopathic profession under the RHPA, without involving homeopaths in regulation at this time.

In place of statutory regulation, CSH recommends a voluntary self-regulating system, which would protect the public interest in a more efficient and less costly manner than a cumbersome regulatory process undertaken by each province.

Our goal is to ensure that homeopathy is practiced by homeopaths who have received full professional training and who adhere to standards of professional development, codes of ethics, conduct, and practice, and procedures for accountability. In addition, we aim to ensure access to professional homeopathic services for Canadians now and in the future.

When practiced by a qualified homeopath within the voluntary self-regulating model, there is no need to provide any additional protection to the public. As long as homeopathy is promoted as a complementary health modality, rather than primary care, there is not sufficient or substantiated risk of harm to warrant legislative restriction of title. It is our opinion that the public will be best served at this time by a complementary health care model.

Development and growth of the homeopathic profession would be hampered if statutory regulation were imposed at this time. The high costs associated with professional regulation would cause many qualified homeopaths to lose their livelihood, especially those who work part-time or in small communities. As a result, the public would face either increased fees for their homeopathic treatment or the loss of access to valuable homeopathic practitioners in their own communities.

Voluntary self-regulating models function successfully in the UK, parts of the USA, and elsewhere, with the support of their respective governments. We hope that the Ontario government will work with us to preserve similar voluntary self-regulating systems for the professional practice of homeopathy and to ensure continued access to this therapeutic system for all citizens.

Therefore, we also urge the Government to delay consideration of regulation of homeopathy until such time as the profession can demonstrate the effectiveness of a voluntary self-regulating system in Ontario.

Thank you for considering this submission on behalf of our members in Ontario.

Sincerely

Jo Twiss, President
Canadian Society of Homeopaths