



February 28, 2009

The Honourable David Caplan, MPP
Minister of Health and Long-Term Care
10th Floor, Hepburn Block
80 Grosvenor Street
Toronto, ON M7A 2C4

Dear Minister,

The Canadian Society of Homeopaths (CSH) is the largest national homeopathic registering organization in Canada. We represent over 150 practicing homeopaths in Ontario, some of whom are naturopaths who have received specialized training in homeopathy that meets our requirements for education and competence.

We wish to comment on the HPRAC report of January 2009 entitled *Critical Links: Transforming and Supporting Patient Care*. In particular, we refer to the recommendations for an amendment to the *Naturopathy Act, 2007* to allow Naturopaths access to the controlled act of prescribing, dispensing, selling, or compounding drugs, including homeopathic medicines.

With the passing of Bill 171 (2007), both the Homeopathic and Naturopathic professions in Ontario will become regulated under the *Regulated Health Professions Act, 1991 (RHPA)*. In the meantime, Naturopaths are covered under the *Drugless Practitioners Act, 1925 (DPA)*, which provides them access to therapeutic substances that are integral to the practice of naturopathy. However, neither the *Homeopathy Act, 2007* nor the *Naturopathy Act, 2007* under RHPA will address the requirements of either profession to access (prescribe, dispense, sell, or compound) the therapeutic substances that are integral to the practice of their respective forms of medicine.

The HPRAC recommendations are intended to address the Naturopaths' need to continue access to the therapeutic drugs – specifically including homeopathic medicines – as they transition from regulation under DPA to RHPA. As pointed out in the *Critical Links* report, Naturopaths have a particular interest in amending the *Naturopathy Act* at this time due to recent federal developments affecting Natural Health Products. New proposals would allow the federal Minister of Health to re-classify any therapeutic product – including homeopathic medicines – as prescription-only, which would be accessible only to practitioners with specific prescribing rights under provincial regulations.

Just as Naturopaths are concerned about these developments affecting homeopathic medicines, so are Homeopaths who specialize in homeopathy and rely completely on homeopathic medicines in the practice of their profession. When each profession becomes regulated under the RHPA (following the conclusion of the transition process and the proclamation of each Act), amendments to their respective Acts will be required that specifically include prescribing rights to homeopathic medicines.

over>>

Although CSH has no objection to granting Naturopaths access to the therapeutic drugs that they require, we wish to draw the Minister's attention to the inequity contained in the HPRAC recommendations in the *Critical Links* report regarding homeopathic medicines. It is equally important that Homeopaths have prescription rights to homeopathic medicines as it is for Naturopaths, as currently recommended by HPRAC. Both professions will require amendments to their respective Acts covering the controlled act of prescribing, dispensing, selling, and compounding homeopathic medicines, which we believe need to occur at the same time. It is not appropriate that Naturopaths be granted rights to homeopathic medicines before the same rights are extended to Homeopaths.

In the interests of granting equal recognition to each profession and their patients, CSH requests that the Minister delay including homeopathic medicines in the amendments to the *Naturopathy Act* and allow each transitional council to work collaboratively and in unison to propose appropriate amendments to their respective Acts, in keeping with the competencies of each profession and including the controlled act of prescribing, dispensing, selling, and compounding homeopathic medicines.

Thank you for providing this opportunity to offer input on the HPRAC recommendations contained in the *Critical Links* report.

Sincerely,

Jo Twiss, RCSHom
President
Canadian Society of Homeopaths