

Dear _____ M.P./ Hon. Member/ Rt. Hon. Member
(cc: Minister of Health, Leona Aglukkaq, and Deputy Minister, Glenda Yeates)

I OBJECT to Health Canada's push to eliminate *all digestive enzymes* from the market, and to the Natural Health Product Regulations forcing countless thousands of long-standing and effective NHPs from Canadian store shelves, while licensing items like Nicorette Gum, and Nicoderm patches as "Natural Products". Never before have I witnessed such a transparent example of Health Canada bowing to the pharmaceutical industry and big-business interests, while harming Canadians by eliminating NHPs they need for their health. It is a blatant violation of human rights.

Health Canada's NHP Directorate is refusing to license digestive enzymes after four decades of widespread safe usage. Their rationales are that digestive enzymes lack data to support safety and efficacy in humans, and that ONE naturopathic doctor has given his opinion that they cannot be established as safe when used for more than three days, because they may inhibit the body's own production.

Besides the obvious question of how one opinion can justify overturning more than three decades of safe use, the point is that due to inflamed digestive tracts, tens if not hundreds of thousands of Canadians do not produce their own digestive enzymes properly in the first place. For these people digestion can be a tortuous process, and failure to absorb nutrients can lead to many other conditions. Using digestive enzymes often allows them to digest and absorb properly, without discomfort. If these products are removed countless Canadians will suffer unnecessary misery, with little option but to turn to our badly overburdened medical system, using more services, and more drugs. Though this would help the pharmaceutical industry, it would directly harm Canadians.

Health Canada's industry notice on enzymes reads: "*the risk associated with the lack of safety data for enzymes outweighs the therapeutic benefits for their use in natural health products. Consequently, enzymes may not be safe when used under the existing recommended conditions of use outlined on product licences and Product Licence Applications (PLA) (i.e. long term use). Additionally, it has been determined that there is a lack of efficacy data to support certain enzymes.*" [emphasis added]

Note, the "risk" is based solely on a lack of data, and ignores that countless millions of bottles of digestive enzymes have been safely sold to Canadians since the 1970s. Therefore, it doesn't matter if enzymes (or any other NHPs) are actually safe or effective. What matters is whether they can produce documented evidence in humans *to prove it on paper*. Yet, because until 2004 they were classed as "Foods", such documentation doesn't exist for a majority of NHPs. They are non-patentable, and performing expensive human trials to create the required evidence was, and still is, financially unfeasible, so is not going to happen. But, the absence of such human studies does not create NHPs risks.

At some point, empirical evidence and common sense must come to bear, and after 40 years of sales, it is obvious that enzymes are safe. ***It is also obvious that the Regulations have little to do with reality.*** They are just a paper-chase with real and serious consequences, being wrought on Canadians 100% from behind a bureaucrat's desk. And all of this is possible because NHPs were classed as a subset of "DRUGS", i.e. a classification they were never supposed to be in – they were supposed to have their own 3rd category.

Health Canada was 100% aware that the majority of NHPs would be unable to meet basic documentation requirements in their new classification. This is presumably why they ignored the massive public protests, and the Standing Committee's direct recommendations against it. They also ignored the very first of Parliament's 53 recommendations on the matter, i.e. that the 'Food and Drugs Act' should be rewritten to provide NHPs with their own category...neither Food nor Drug. To date these regulations have eliminated between 40,000 - 50,000 NHPs from the Canadian market. (For further details, see the full report for M.P.s at www.suspendandreview.com)

How is this being allowed in what is supposedly a democracy, when the Canadian public and Parliament spoke so clearly about what they wanted? Obviously, Health Canada doesn't have to answer to either, and when they lose in court they just ignore the ruling. They are operating outside the law, and no one holds them to account.

What protection do Canadians have when the Agency's agenda serves international and big-business interests, but makes our citizens sick in the process? The civil servants involved are committing an absolute disservice to the health and wellbeing of Canadians, while their salaries are being funded by taxpayers!

As has been so clearly stated by Prime Minister Harper, **all matters of health are a provincial jurisdiction**, and this includes Natural Health Products. Delivering this responsibility to the provinces must be initiated now, or the issue must go to court to prevent further illegal assumption of authority by Health Canada. This can no longer be allowed.

Alternatively, a moratorium needs to be placed on enforcement of the NHP Regulations so they can be revised to provide the truly unique third category that was repeatedly promised to the natural health industry. The alternative is continued gross injustice for Canadian citizens and businesses at the hands of Health Canada.

Thank-you for your time and attention. Please reply in writing to the above concerns, as well as those listed below.

Signed _____ Print name _____ Date _____

Address _____

Constituency _____

(Tri -fold line, please tape, no staples)

Additional Comments/Questions:

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