

TCM Practitioner to Minister of Parliament re: NHPD and Moxa Sample Letter:

(Name) Member of Parliament (Constituency)

(Street Address)

(City, Town)

(Postal Code)

(Date)

Dear *[Name of MP here]*

I am a licensed healthcare practitioner of Traditional Chinese Medicine (TCM), and I am one of your constituents. I know that your attention is focused on the upcoming elections and that you are hoping that constituents in your riding, like me, will continue to support you. As your constituent, I am hoping to seek your support on matters that are not just affecting me, but also affecting the thousands of patients that I treat yearly.

Our country is in an Opioid crisis and my ability to help control this situation by offering my patients natural, time-tested solutions to manage pain is being restricted. I help my patients' health concerns by using all the various modalities of TCM to reduce pain and restore function.

Over the last number of years, the Natural Health Product Regulations (NHPRs) have impacted my practice on a number of levels and have reduced my access to traditional products used for patient care.

What I have witnessed over the years is that the NHPRs, as written, have a broad range of interpretations. Different officials have interpreted the regulations with different degrees of enforcement.

For example, a health product is available from one supplier but not another because one Health Canada official made an interpretation about the product that is different from the Health Canada official reviewing the second company. As a result, one supplier is able to supply me with my traditional products and the other not. This is unfair, and I am sure unintended, but it needs to be corrected.

In addition to the regulatory discrepancies, the NHPRs do not address "Professional Use Products". The current regulations are geared to managing risks of over-the-counter (OTC) natural products. To date, there are no specific regulations within the NHPRs that address the reduced risk of a practitioner prescribing natural products. This category of Professional Use was promised during the implementation of the NHPRs in 2004, but no action to date has occurred.

A more blatant misinterpretation of the regulations has recently occurred. This situation entails a confusion of a clinical modality used in TCM called Moxibustion and its classification by Health Canada.

Moxibustion is one of the 5 pillars of Chinese medicine. The others, Acupuncture, Herbology, Tui Na (physical therapy) and Qi Gong (self-care techniques) are the remaining four. The word “Moxa” comes from the Japanese word *Mogusa* which is the Japanese name for the plant *Artemisia Vulgarus*, or Mugwort. The plant fibers are processed into a woolly punk that is formed into various shapes. This moxa wool is lit, and the ember from the burning punk is used to heat acupuncture points or provide a heat source to a needle or region of the body. The heat produced by the burning punk is therapeutic.

This method is thousands of years old and is a significant modality in TCM. It is one of the first medical devices developed along with acupuncture needles.

I have been using Moxa in its various forms for years. This year, one of my suppliers has had their shipment rejected because a Canada Border Services Agent’s review of one of the shipments resulted in the border official contacting Health Canada to get a ruling on the Moxa products they import. The border official, not knowing how to classify the product, asked Health Canada for guidance. When Health Canada looked at it, they decided that since Moxa is a plant, and there is an intended therapeutic use of this plant, then it should be licensed as a Natural Health Product.

This is a complete error! As a practitioner, I am informing you that Moxa wool as a heating tool cannot be forced to be processed as a Natural Health Product with GMP requirements. It would be like asking an importer of firewood to present a certificate from a lumber mill that the wood has been milled to building code standards! A complete mistake! This is a completely uneducated response and a misinterpretation of the regulations.

When the plant is used for internal medicine as part of an herbal formula it is called by its proper name, *Ai Ye* (*Artemisia Vulgarus*). It comes as dried unprocessed leaves or in concentrated granules and meets NHPD regulatory standards.

When it is imported as a heating tool, it is called Moxa and comes in a processed woolly form, with various degrees of refinement. It can also come rolled up in the shape of cigars or little rolled pieces attached to a cardboard backing with a special adhesive underneath.

My supplier has requested a formal review of this decision, but I have decided to reach out to you because my ability to help patients is being negatively impacted because of regulatory confusion and the lack of attention on Professional Use Products.

My treatments have helped patients with chronic pain and offer less invasive and less addictive methods of managing pain.

With today's Opioid crisis underway due to the overuse of pharmaceutical medicine, I would hope that you would help me do my work in a manner that is safe, non-addictive and proven from thousands of years of traditional use.

I am asking you to do the following:

- Please put pressure on the Health Minister to review how the NNHPD has not addressed Professional Use Products. My ability to compound, combine and prescribe traditional herbal products is being unnecessarily restricted.
- Also, please inform her of the blatant confusion of the TCM heating tool called Moxa that is being perceived by her NHPD staff as an NHP. Please impress on her that because of this misinterpretation, Canadian TCM practitioners' ability to help their patients, with time proven methods, is severely and unnecessarily restricted.

Thank you for your time. I know you are busy, but if you could help in anyway, I and my TCM colleagues would appreciate it very much.

If you have any questions, please feel free to contact me.

Sincerely,

(Your Name)

(Street Address)

(Town, Province)

(Postal Code)

(Phone Number if applicable)