**Practitioner or Personal Survey Response Suggestions**

Thank you for taking the time to fill out and submit your comments to the NNHPD regarding the “Cost Recovery Plan” proposal made public May 12, 2023. They have requested input from consumers, interested members of the public and Natural Product stake holders. You can locate the page requesting feedback here: <https://www.canada.ca/en/health-canada/programs/consultation-proposed-fees-natural-health-products.html>

The online form has 5 sections asking for feedback on specific segments of their proposal.

We have listed the section questions and a proposed response in dark blue. You can use our suggested response or revise according to your own thoughts. What we listed here were fees that we felt reasonable for manufacturers and importers to manage. We also feel that the amounts listed here are reflective of the low risk nature (compared to pharmaceuticals) of Natural Health Products. We as a profession need to push back and resist the NNHPDs effort to over regulate and burden the natural health product industry with excessive labeling and documentation demands.

Here are the questions and proposed responses. Copy and Paste or modify and paste as you feel fit. Please submit the form AS SOON AS POSSIBLE or definitely before July 26!

**NNHPD Question 1:** Please input your feedback on the proposed fee structure and fee amounts. The fee proposal may be viewed [here](https://www.canada.ca/en/health-canada/programs/consultation-proposed-fees-natural-health-products/fees-fee-policy.html). ‘

**Proposed Answer:**

I am a **xxxxx (enter profession here)**. I rely on a wide range of NHPs for my patients’ care. The fees as listed will create undo pressure on the importers and manufacturers of these products and thereby limit my access to these important products. Herbal and natural medicines are low risk products. When used under my care, they provide great relief to patients and help to promote stronger and healthier states of wellness. I strongly disagree that these fees be charged. If deemed necessary, they should be reduced to amounts that are manageable for our suppliers. The “Right to sell” should be reduced to a reasonable administrative amount of $25.00 to $50.00 annually. These products have been already approved and the listed amount would easily cover the cost to pay for a line item change in your data base on a yearly basis.

Also, the proposed fees for manufacturers and importers should be adjusted based on the product volume amount of the NHP sold. I also feel that product licensing fees for NHP be kept at affordable rates for small and medium sized companies, so that they can continue to innovate and provide me with the products I need in my clinic.

Finally, the cost for new NHP applications should be kept at a minimum to cover administrative costs, not enforcement costs. These products are low risk substances and the industry is by and large compliant. I would consider $200.00 for a class 1 new application, $300.00 for a class 2 application and 400.00 for a class 3 application. A small fee of $50.00 for an amendment to the license should be considered as these are line-item changes in the application.

I must stress, the NNHPD should not be in the position of generating funds for enforcing compliance to ever increasing regulatory controls on Natural Health Products. The number of adverse events in the Natural Health industry do not justify a heavy regulatory process. I do agree with requirements of companies to follow general GMP processes to ensure quality. However, that being said, I do not believe they should be placed under the same pharmaceutical standards which do include dangerous and potential life threating medications that require meticulous control.

**NNHPD Question 2:** Please input your feedback on the proposed service standards and penalties for missed standards. The fee proposal may be viewed [here](https://www.canada.ca/en/health-canada/programs/consultation-proposed-fees-natural-health-products/fees-fee-policy.html).

**Proposed Response:**

In discussions with my suppliers, I have been made aware that Health Canada is struggling to meet its current service standards. I propose that no cost recovery be implemented until the NNHPD is able to meet the current standards they have in place.

**NNHPD Question 3:** Please provide your feedback on the proposed mitigation measures, including for small businesses. The fee proposal may be viewed [here](https://www.canada.ca/en/health-canada/programs/consultation-proposed-fees-natural-health-products/fees-fee-policy.html).

**Proposed Response:**

In my discussion with our suppliers, it has been made clear that the mitigation measures for small business do not clearly differentiate revenue from NHP sales for which these regulations and proposed fee structure apply and other revenues from non NHP products that may generated by the importer. The mitigation measures should only apply to revenue from Net revenue from NHP sales. In addition, with regards to TCM (or herbal extracts) NHPs, importers are dealing with hundreds of items to meet my needs as a compounding practitioner. I propose that the fee mitigation strategies should include the following categories for further significant fee reductions: the number of licenses that the importer is managing, if these NHPs are intended for professional use and if the NHP is a single item product or a multi-item compound.

**NNHPD Question 4:** Please provide your feedback on the proposed timeline for implementation (April 1, 2025). The fee proposal may be viewed [here](https://www.canada.ca/en/health-canada/programs/consultation-proposed-fees-natural-health-products/fees-fee-policy.html).

**Proposed Response:**

If the timeline were adjusted to 2026, and the costs were adjusted to the levels suggested above, I feel that the industry would be able to adapt with minimal interruption to servicing my clinical needs.

**NNHPD Question 5:** Please provide any other comments you have related to the fee proposal. The fee proposal may be viewed [here](https://www.canada.ca/en/health-canada/programs/consultation-proposed-fees-natural-health-products/fees-fee-policy.html).

**Proposed Response:**

Under section 7 of the Canadian Charter of Rights and Freedoms, Canadians are granted the right to life, liberty and security of person. Having access to affordable natural substances is my preferred method to maintain health to ensure my “security of person” which is mentioned an enshrined right assured by the government.

I therefore reject the continual push by Health Canada and the NNHPD to manage the traditional low risk professionally dispensed compounds under the same umbrella as pharmaceutical level products. Your excessive proposed cost measures are not required, as we have a compliant NHP industry that requires minimal management.

That being said, there are large supplement and pharmaceutical companies attempting to create novel compounds from Natural products. These companies do require additional monitoring and higher cost recovery measures. Natural Health practitioners, like myself, follow traditional methods that are time tested, and dispense products to our patients. We feel that our suppliers should not have this timeline and these costs imposed on them. They already have had to endure additional costs to comply with the current label and regulatory requirements. I believe our current tax payer fees cover the current level of monitoring and maintenance of my NHPs which consumers are paying for out of pocket. Pharmaceutical drugs are covered by the Health Plan and yet have much more risk of death and serious adverse effects. I suggest that you focus on regulating and overseeing the pharmaceutical industry more as a result. A different regulatory category for professionally dispensed products is needed and requested.

Thanks for participating with us on this movement to protect our NHPs. Eastern Currents is committed to a safe and reasonably priced NHP for professional use. Your participation in will help to ensure that we can maintain our current level of service and product availability to you!