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Mr. Stephen Norman, Director
Natural and Non-Prescription Health Products Directorate
Health Products and Food Branch
Health Canada
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Consultation regarding Importation of Homoepathic Remedies

Dear Mr. Norman,

Further to our letter dated June 15, 2025. It has been some months since we have written to you with the expectation that you will consider our concerns regarding the Public interest, and the obstacles confronting Registered Homeopaths, regarding the potential impact on patients who do not receive their homeopathic medicines timeously.

We explained in detail the principles of homeopathy as they relate to homeopathic medicines and confirmed that these medicines are “Raw Materials” as per the definitions published by Health Canada. We provided homeopathic references and links to Health Canada policy which are interconvertible and insist that you consider the needs of patients and the ability of Homeopaths to respond and to provide appropriate treatment.

We have explained to you the risk to patients who do not receive their medicines in time. These actions by Health Canada or the Border Services are not trivial. These are risks with calculable outcomes. I do not believe, besides the ethical implications, that Health Canada would want to engage in such practices which can result in injury to the Public. These risks can be measured in many ways which can result in patient harm and even death.

The College confirms that homeopathic medicines continue to be stopped at the Border and that this disruption is not only impacting the practices of Homeopaths but also challenges their relationships with international homeopathic pharmacies who are often facing unrecoverable costs. This does not bode well for the reputation of Health Canada or our Homeopaths. There are also implications which apply to the Insurance industry, and the requirements for Registered Homeopaths to carry practice insurance. Disruptions in the delivery of prescribed homeopathic medicines could result in substantial Insurance claims.

With reference to my earlier letter, “Regulations and border operations often follow rigid policies and consequently can have unintended consequences on homeopathic practice. Working within the regulatory framework, there are many players involved. NNHPD may want to follow rules, but if there needs to be clarity of interpretation of the rules, this needs to be done fairly with due consideration

since we are sometimes dealing matters of life and death, the patients' health, which can be critical. We need to ensure that homeopathic remedies will not be held at the border ever again. This is too big a risk for NNHPD to take. If there is ever any uncertainty, it should be obligatory to call the registered Homeopath."

There should be no attempt to restrict the entry of remedies from international sources especially where these raw materials are not available in Canada. This practice must further be reinforced by the definition of Raw Materials, which are already defined and published by Health Canada. Every form of homeopathic remedy preparation can be used for compounding purposes as per the guidelines provided by Health Canada: https://www.canada.ca/en/health-canada/services/drugs-health-products/natural-non-prescription/legislation-guidelines/policies/compounding-policy.html

Consequently, Health Canada must ensure that standards, importation rules and guidelines established by the NNHPD, the CBSA and Health Canada are implemented immediately.

It is evident that the international homeopathic pharmacies have clearly stated on their customs labels that the package contains raw materials for "further compounding" and for use by a qualified practitioner or their patient. It has been understood that if an international company/pharmacy has form 7, this is the recognized quality control standard. There should be no confusion by Health Canada or the Border Services that these imported remedies have been ordered by Registered Homeopaths for patients in need. Therefore, there is no reason to disrupt the delivery of these imported remedies. Indeed, there are risks, as stated above, attached to the purposeful disruption of delivery of these remedies.

We have already determined that Homeopathic remedies are defined by Health Canada as Raw Materials and pose no harm to the public.

Remedies are ordered for patients. Homeopaths may import remedies and compound them, but it is important to remember that the purpose is to help patients.

The College of Homeopaths of Ontario is regulated by the Government of Ontario and has members not only throughout Ontario, but also in other provinces. In addition, there are membership organizations in other provinces.

Respectfully,

Basil Ziv, HOM
Registrar and CEO

cc: Hon. Sylvia Jones, Minister of Health
Dr. Karima Velji, Assistant Deputy Minister and Chief of Nursing and Professional Practice
Allison Henry, Director, Health Workforce Regulatory Oversight Branch