



## Executive Summary

Canada's naturopathic doctors are primary care providers and experts in natural medicine. Naturopathic doctors (NDs) focus on health promotion and disease prevention by treating the whole person, looking at the overall health of a patient rather than solely addressing symptoms. The philosophy of naturopathic medicine includes stimulating the healing power of the body and treating the underlying or root cause of disease.

A Naturopathic doctors' role in health promotion and disease prevention is of extreme value to Canada's healthcare system. As a healthy workforce is vital to Canada's competitiveness and productivity, the Canadian Association of Naturopathic Doctors (CAND) would like to offer its valuable knowledge and resources to achieve successful outcomes for patients, making them more efficient and productive and alleviating the growing pressures on Canada's overburdened healthcare system.

The CAND believes that naturopathic doctors are well positioned to assist the government in increasing the competitiveness and productivity of Canada's workforce in several ways by:

- Helping to prevent and manage chronic disease;
- Helping Canadians suffering from prescription drug dependency;
- Assisting in the appropriate prescription and use of medicinal cannabis; and
- Working to improve health outcomes for veterans and Indigenous communities.

As our health care system evolves and the demand for individualized care increases, a need for allied healthcare professionals to come together and provide integrative, patient centered care becomes paramount. In order for naturopathic doctors to play an enhanced role on patient health care teams and improve the overall health and wellbeing of Canadians, the CAND makes the following requests to the Government of Canada:

**1. The federal government broaden the definition of health care practitioner found in Part 14 of the Cannabis Regulations to include naturopathic doctors practicing in provinces that have given them the authority to treat their patients with prescription drugs.**

**2. The federal government remove the barrier that prevents Provinces and Territories from choosing to allow naturopathic doctors to prescribe and administer selected drugs containing legally controlled substances, to ensure the optimal treatment of patients.**

**Similar privileges were provided to nurse practitioners, midwives, and podiatrists in the 2012 Budget, by creating the New Classes of Medical Practitioners Regulations. Naturopathic doctors are seeking to be added to the list of practitioners under the same regulations.**

**3. The Government of Canada include care by regulated naturopathic doctors (or those in unregulated jurisdictions who meet the criteria for regulation) as an option in the spectrum of healthcare services made available to Canadian veterans.**



**Recommendation 1: The federal government broaden the definition of health care practitioner found in Part 14 of the Cannabis Regulations to include naturopathic doctors practicing in provinces that have given them the authority to treat their patients with prescription drugs.**

On July 11, 2018 the Government of Canada published the regulations that will support the *Cannabis Act*. The CAND was pleased that the government broadened the definition of practitioners for prescription drugs, meaning that naturopathic doctors practicing in provinces that have given them the authority to treat their patients with prescription drugs (British Columbia and Ontario) will have the ability to administer, sell and distribute drugs containing cannabis. Unfortunately, an alternate definition of practitioner was used in Part 14 – *Access to Cannabis for Medical Purposes*, one that only provides physicians and nurse practitioners with the authority to authorize the use of medical cannabis.

As one of the few medical professions with a comprehensive understanding of the clinical indications, interactions, toxicology and research into the use of medicinal cannabis, it is important that NDs are given the authority to administer and authorize the use of cannabis for medical purposes.

While cannabis will be legalized for recreational use and accessible to all adult Canadians on October 17, 2018, the CAND maintains that a robust medical regime must remain intact so that patients, who are struggling with serious and chronic diseases, or with drug addiction, can access cannabis from a qualified healthcare practitioner and benefit from clinical oversight.

Many patients dependent on opiates for management of their cancer or chronic pain have found that by using cannabis medicinally, they are dramatically able to reduce previously required opiate doses. By also minimizing the many complicating and frequent adverse effects of these powerful and highly addictive drugs they find significant improvements in their quality of life and are able to overcome their otherwise increasing dependency.

During consultations on the Cannabis Act, Health Canada acknowledged the urgent need to improve patient access and facilitate greater choice for Canadians who would benefit from the use of cannabis for medical purposes. Unfortunately, without broadening the definition of health care practitioner and making it consistent and in line with the definition of practitioner found in Part 8 of the regulations supporting the Cannabis Act, this will not happen, and patients will continue to experience challenges accessing cannabis for medical purposes.

**Recommendation 2: The federal government remove the barrier that prevents Provinces and Territories from choosing to allow naturopathic doctors to prescribe and administer selected drugs containing legally controlled substances, to ensure the optimal treatment of patients.**

The intent of naturopathic doctors is similar to that of general medical practitioners: ensure patient-centered, best practices in primary care practice. However, unlike general practitioners, naturopathic doctors face a significant barrier to providing timely, effective care - the ability to access federally controlled drugs.

Currently, the provinces of British Columbia and Ontario have granted prescribing authority to naturopathic doctors with more provinces to follow over time. While naturopathic doctors in those provinces can now prescribe prescription medication there is a significant exception in that they do not have access to controlled substances under the Controlled Drugs and Substances Act. This limits a



naturopathic doctor's ability to provide the care needed for patients dealing with a variety of health issues and addiction challenges.

**Recommendation 3: The Government of Canada include care from regulated naturopathic doctors (or those in unregulated jurisdictions who meet the criteria for regulation) as an option in the spectrum of healthcare services made available to Canadian veterans.**

The Government of Canada is making great strides in improving services provided to Canadian veterans. Increasingly, veterans are returning from service with health problems such as post-traumatic stress disorder (PTSD), anxiety, sleep disturbances, opioid dependencies and chronic pain. Naturopathic doctors are well positioned to assist in mental and emotional care as well as addressing pain management with non-pharmacologic therapies and overall person-centered care. There are currently a number of veterans actively seeking care from naturopathic doctors. However, since naturopathic care is not normally an option or available health service for veterans and is an additional expense, they shoulder the costs associated with naturopathic treatment. In order to ensure that our veterans are receiving the support they need, particularly with regards to their mental health, the CAND recommends that the Government of Canada include care by regulated naturopathic doctors (or those in unregulated jurisdictions who meet the criteria for regulation) as an option in the spectrum of healthcare services made available to Canadian veterans.

**Naturopathic Doctors' Role in Fighting Chronic Disease**

According to the Public Health Agency of Canada, expenditures to treat chronic diseases are rising faster than our economic growth. Treatment of chronic disease consumes 67% of all direct health care costs, and cost the Canadian economy \$190 billion annually – \$68 billion is attributed to treatment and the remainder to lost productivity. This is especially troubling considering that many chronic diseases are, for the most part, preventable with simple behavioral changes, such as physical activity and diet.

Naturopathic doctors play a key role in managing chronic illness and work with patients to effectively address pain, mobility, digestive and weight or dietary issues commonly associated with chronic disease.

The primary goal of naturopathic medicine is to build, restore, or maintain health. Naturopathic medicine teaches the benefits of a healthy lifestyle, in order to prevent the development of chronic illness and disease.

Naturopathic doctors work with their patients to prevent and treat disease by promoting the use of organic and whole foods, encouraging exercise and a balanced, healthy lifestyle, and by using more natural forms of medicine such as botanical medicine, clinical nutrition, and Traditional Chinese Medicine in addition to more conventional approaches such as intravenous therapies.

There are no magic bullets when it comes to our health. Naturopathic doctors focus on a doctor-patient relationship that involves educating and empowering a patient to take an active role in managing their own personal health, making the lifestyle and behavioural changes that will activate and support the body's own natural healing ability. According to the Canadian College of Naturopathic Medicine, "cost savings from adjunctive naturopathic care were found to be \$1187 and \$1138 per employee". These cost savings, estimated using direct medical costs and indirect productivity costs, were in addition to reductions in various diseases and risks.



## **Prescription Drug Dependency**

Many Canadians struggle with prescription drug dependency, from sleeping pills, to chronic disease medication, to pain killers. While the types of medication vary the seriousness of the addiction does not. For decades, patients have been seeking support from naturopathic doctors to overcome prescription drug additions.

Patients, who once could not get through the day without their prescription medications, are living independent, productive lives. For example cancer patients, who, while beating the odds and winning in their battle against cancer found themselves becoming dependent on the opioid or benzodiazepine medication first prescribed for their cancer pain, anxiety or insomnia. Naturopathic doctors work closely with these patients to successfully overcome the addiction and get back to leading healthy productive lives.

However, a significant barrier continues to limit a naturopathic doctor's ability to fully support these patients and in some instances, invites complications to the recovery process. Weaning a patient off a controlled substance requires a closely monitored and integrative approach. Specifically, it requires the ability, over time, to reduce the patient's dose of the controlled drug. Co-ordination with a medical doctor's schedule puts the patient in a difficult position and often does not allow for the patients to receive the lower dose prescriptions that are required in the timeframes needed for the ND to support the weaning off process. This affects a patient's ability to achieve optimal outcomes. In order to overcome this challenge, the Government of Canada should allow naturopathic doctors to prescribe and administer selected drugs containing legally controlled substances and authorize access for NDs to medical cannabis. Doing so would drastically improve the lives of many dealing with addiction and at the same time reduce costs to our healthcare system.

## **Working to Improve Veterans Health Outcomes**

The CAND is seeking to work with the federal government and Veterans Affairs to assist in improving care provided to Canadian veterans. Presently, naturopathic care is not normally an option or available health service for veterans; therefore, naturopathic care is an additional cost for those seeking this whole person approach to health.

Increasingly, veterans are returning from service with health problems such as post-traumatic stress disorder (PTSD), anxiety, sleep disturbances, opioid dependencies and chronic pain. In a 2013 Canadian Medical Association Journal study, it was reported that "over an eight-year period following the first deployment of service personnel to Afghanistan, about 20% were diagnosed with a mental health disorder attributable to their service in Afghanistan." The rate and risks are known to have been higher and more prevalent in those deployed to Kandahar.

Naturopathic care can assist in mental and emotional care but also in addressing pain management with non-pharmacologic therapies and overall person-centered care.

Benefits such as naturopathic care are often considered more vital than financial compensation, providing Veterans with the support that they require to live their lives fully. Carl Gannon, National President of the Union of Veterans Affairs Employees, said "'For many veterans, these treatments mean the difference between life and death.'



The CAND requests that the government include care by regulated naturopathic doctors (or those in unregulated jurisdictions who meet the criteria for regulation) as an option in the spectrum of healthcare services made available to Canadian veterans.

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