



**Written Submission for the Pre-Budget Consultations
in Advance of the Upcoming Federal Budget**

By: The Canadian Association of Naturopathic Doctors



Recommendations

The Canadian Association of Naturopathic Doctors (CAND) recommends that:

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 select drugs containing legally controlled substances, to ensure the optimal treatment of patients.
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 health care services made available to Canadian veterans.



Executive Summary

Canada's naturopathic doctors are primary care providers and experts in natural medicine. Naturopathic doctors 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.

A naturopathic doctor's role in health promotion and disease prevention is extremely valuable to Canada's health care system. Naturopathic Doctors take their commitment to the health of Canadians very seriously and continue to do all that they can, based on public health recommendations and guidance from their regulatory authorities, to support their patients during the current pandemic. Naturopathic Doctors were among the health care providers who continued to provide essential services to their patients, providing urgent in person care or relying on telemedicine to continue caring for patients. Naturopathic Doctors play a valuable role in the public health system and in governments' ongoing efforts to respond to the pandemic and prepare for future waves.

As a healthy workforce is vital to Canada's economy, 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 health care system.

The CAND believes that naturopathic doctors are well positioned to assist the government in strengthening Canada's economy and workforce 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.

As our health care system evolves and the demand for individualized care increases, the need for allied health care 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 select drugs containing legally controlled substances, to ensure the optimal treatment of patients.**

Nurse practitioners, midwives, and podiatrists were granted similar privileges in the 2012 Budget, which created 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 health care services 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.

In July 2018, the Government of Canada published the regulations that 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*, 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 naturopathic doctors are given the authority to administer and authorize the use of cannabis for medical purposes.

While cannabis is now legal for recreational use and accessible to all adult Canadians, the CAND maintains that a robust medical regime must remain intact so that patients who are struggling with serious and chronic diseases or drug addiction can access cannabis from a qualified health care practitioner with the benefit of clinical oversight. Canadians are also supportive of this position, with 78% indicating support for health care practitioners overseeing the use of cannabis for medical purposes and providing guidance of what products work and how best to use them (January 2019 survey).

Many patients dependent on opiates for management of their cancer or chronic pain have found that by using cannabis medicinally, they are able to dramatically 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 can 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 to make it consistent with the definition of practitioner in Part 8 of the regulations, 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 select drugs containing legally controlled substances, to ensure the optimal treatment of patients.

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

Currently, British Columbia and Ontario have granted prescribing authority to naturopathic doctors with more provinces expected to follow. 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.

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 beat the odds and won their battle against the disease 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 return to leading healthy productive lives.

Weaning a patient off a controlled substance requires a closely monitored and integrative approach. Specifically, it requires the ability to reduce the patient's dose of the controlled drug over time. Co-ordination with a medical doctor's schedule puts the patient in a difficult position and often does not allow the patient to receive the lower dose prescriptions that are required in the timeframes needed for the naturopathic doctor 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 select drugs containing legally controlled substances. Doing so would drastically improve the lives of Canadians dealing with addiction and at the same time reduce costs to our health care system.



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 health care services made available 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. 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.

The CAND is seeking to work with the federal government and Veterans Affairs Canada to assist in improving care provided to Canadian veterans. Naturopathic care can assist in mental and emotional care but also in addressing pain management with non-pharmacologic therapies and overall person-centered care. There are currently many 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.

Benefits such as naturopathic care are often considered more vital than financial compensation, providing Veterans with the support 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.”

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) in the spectrum of health care 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.

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.

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 \$1,187 and \$1,138 per employee”. These cost savings, estimated using direct medical costs and indirect productivity costs, were in addition to reductions in various diseases and risks.