



BILL C-224: AN ACT TO AMEND THE FOOD AND DRUGS ACT (NATURAL HEALTH PRODUCTS)

SUBMISSION TO
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About the ASPQ

The Association pour la santé publique du Québec (ASPQ) is an independent association of citizens and partners working to make sustainable health a priority. Sustainable health is based on a long-term vision for providing care to all and ensuring good health through prevention.

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BACKGROUND

In Canada, the cult of thinness is omnipresent, and it is hurting Canadians' health and well-being.

- **Half of all Quebecers** say they are dissatisfied with their weight, including 58% of women.¹
- **Nearly half of all Quebecers** have attempted to lose weight in the past year.¹
- **One in five Quebecers** say they are obsessed with managing their weight.²

Weight preoccupation is a social phenomenon that normalizes and encourages the use of unsafe weight loss methods, including natural health products (NHPs) marketed for weight loss.

Weight preoccupation is a social phenomenon that normalizes and encourages the use of natural health products for weight loss.

Since 2003, the ASPQ has been monitoring, documenting and reporting on the risks associated with weight-loss products, services and methods, including weight-loss NHPs. Consequently, **the ASPQ recommends rejecting Bill C-224**, which scales back NHP regulation, putting public health at risk.

ISSUE

A wide range of NHPs is being promoted for weight loss in Canada. These include, but are not limited to, stimulants with thermogenic potential (e.g., green tea and caffeine), appetite suppressants (e.g., psyllium), metabolic modulators (e.g., garcinia cambogia), laxatives (e.g., senna and aloe), and diuretics (e.g., dandelion).

Regulation of natural health products

According to a 2021 report by the Office of the Auditor General of Canada, NHP licensing does not guarantee the efficacy or safety.³ The report found:

- **a lack of transparency** in the information provided to the public about NHPs. In fact, 88% of the products reviewed had misleading information in their advertisements, and 56% had misleading information on their labels.
- **a lack of oversight** in the NHP licensing process, particularly with regard to manufacturing and marketing practices.³

Although the report did not assess every single NHP available in Canada, it highlighted several troubling cases and illustrated the importance of not relying solely on industry self-regulation.

Natural health products for weight loss: Unproven effectiveness and health risks

The long-term efficacy of weight loss NHPs is unproven. **Manufacturers' studies are often of low methodological quality** (small sample sizes, animal studies, short-term follow-up, no significant effect on weight, etc.).

Weight-loss NHPs can be hazardous to the health of the people who take them. They contain long lists of ingredients, so it is hard to compile a complete list of their potential unwanted side effects. An Institut national de santé publique du Québec advisory highlights the risks associated with several ingredients contained in these products, such as green tea, chromium picolinate, senna and others.⁴ Moreover, **some ingredients can cause adverse health effects**, such as fatigue, headaches, sleep disorders, anemia, digestive disorders, kidney and liver toxicity, heart and respiratory problems, or even death in the event of serious complications.^{5,6,7,8}

In addition, research focuses on isolated ingredients, not on combinations of ingredients.^{5,6,7,8} However, **many NHPs for weight loss contain a long list of medicinal ingredients**, as shown in the table below. This increases the risk of drug interactions and unwanted side effects.

Examples	Lists of medical ingredients
Chili Burn™ Max by New Nordic	Green tea leaf extract, black cumin seed extract, chili pepper extract and chromium
Hydroxycut + Woman by Hydroxycut	Vitamin D, thiamin, riboflavin, niacin, vitamin B6, vitamin B12, coffee extract, apple cider vinegar, plum, baobab extract and cardamom
Green Tea Triple Fat Burner by Appliednutrition	Vitamin C, vitamin E, niacin, folic acid, vitamin B12, green tea extract, orange pekoe tea extract, caffeine and citrus bioflavonoids

It has also been demonstrated that the side effects of NHPs tend to be under-reported. Only 41% of Canadians who experienced unwanted side effects after using these products reported them to Health Canada.⁹

The example of *Garcinia cambogia*

In Canada, numerous NHPs for weight loss contain *Garcinia cambogia*, which is associated with appetite-suppressing effects. Since 2003, Health Canada has authorized the sale of more than 600 products containing this ingredient.¹⁰ Recently, *Garcinia cambogia*-based appetite suppressant gels have become popular on social media, raising concerns about exposure to these products, which are not without health risks, especially among young people.¹¹

In 2020, Health Canada issued an advisory warning of a possible link between the use of *Garcinia cambogia* and cases of hepatotoxicity. Since then, manufacturers have been required to update risk information on product labels to include precautionary statements and symptoms that are precursors to liver toxicity.¹⁰

The example of *Garcinia cambogia* illustrates the relevance of continuing to enforce the [Protecting Canadians from Unsafe Drugs Act \(Vanessa's Law\)](#) for NHPs. In some cases, weight-loss NHPs can pose a real risk to public health. In this case, government actions in terms of labelling, product recalls, and even penalties for non-compliance with regulations are necessary in order to quickly and effectively reduce these risks.¹²

Canadians' health should take precedence over industry interests. As such, **the ASPQ recommends rejecting Bill C-224 and reiterates its support for the powers conferred by Vanessa's Law that apply to NHPs (in particular, thanks to the adoption of Bill C-47).**

We believe that including all NHPs in the definition of "therapeutic product" and enforcing the associated regulatory provisions are crucial to strengthening their oversight. Such an approach will better protect the public and strengthen Canadians' confidence in the safety of these products.

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