

January 12, 2011

CBC Marketplace
P.O. Box 500 Station A
Toronto, Ontario
M5W 1E6

Attention: Erica Johnson

Dear Erica:

I am writing on behalf of l' Association Pharmaceutique Homéopathique du Canada-Canadian Homeopathic Pharmaceutical Association (APHC-CHPA) in regard to your program segment on homeopathy and homeopathic medicines scheduled to air (according to the Marketplace web site) on January 14, 2011. The description of this segment and preview posted on your site are cause for concern as they suggest that your segment will omit some highly important information that your viewers deserve to have as they consider the substance and merit of your coverage.

APHC-CHPA is Canada's national industry association representing the public policy and regulatory interests of manufacturers and importer-distributors of homeopathic medicines (HMs). Put in other terms, the association is concerned with policy and regulation that apply to homeopathic products, not the practice of homeopathy or other medical disciplines.

This industry association was established in response to Health Canada's formal recognition of HMs as drug (pharmaceutical) products in 1990 (Information Letter #775), accompanied by the requirement that HMs be regulated as drugs and comply with the Food and Drug Regulations pursuant to the Food and Drugs Act. Between 1989 and 1996, Health Canada consulted extensively with our industry on the appropriate regulation of HMs in Canada, taking into account legislative and regulatory precedents of other countries, France, Germany and the U.S. in particular. In 1996, Health Canada's Therapeutic Products Directorate (then Drugs Directorate) published both a Good Manufacturing Practices (GMP) guidance document and a Labelling Standard for homeopathic medicines.

In 1998, TPD also published a guidance document (still accessible on Health Canada's web site at http://www.hc-sc.gc.ca/dhp-mps/alt_formats/hpfb-dgpsa/pdf/prodpharma/homeopat_pol-eng.pdf) entitled ***Indications for Use – Multi-Ingredient Low Dilution Homeopathic Preparations***, permitting indications (claims) for such products where supported by 3 recognized pharmacopoeias and two traditional use references. The three pharmacopoeias are the *Homeopathic Pharmacopeia of the United States* (HPUS), La "*Pharmacopée française*" (PhF) or the "*Homöopathische Arzneimittel*" (now

Homöopathisches ArzneiBuch – HAB or German Homeopathic Pharmacopeia), all still recognized by Health Canada as references in the manufacture and labeling of HMs in Canada, along with the European Pharmacopoeia (Ph. Eur.) and the Encyclopedia of Homeopathic Pharmacopeia (EHP). These are referenced in the current Health Canada guidance document entitled ***Evidence for Homeopathic Medicines*** (<http://www.hc-sc.gc.ca/dhp-mps/altformats/hpfb-dgpsa/pdf/prodnatur/ehmg-nprh-eng.pdf>).

We would draw to your attention that these internationally recognized pharmacopoeias are peer-reviewed compendia of information pertaining to the source, safety, efficacy and methods of manufacture of pharmaceutical products and preparations. To answer your question stated in your web site segment preview “*we ask the Ontario government and Health Canada why they are lending credibility to the homeopathic industry*”, you need to invest an appropriate amount of time researching and understanding not only these compendial references but also the body of evidence for HMs that exists in traditional references and materia medica and the statutes and regulations of the U.S. and EU member states whose competent regulatory agencies are also recognized by Health Canada.

By end of 1998, Health Canada had issued over 4700 Drug Identification Numbers (DINs) for single ingredient and multi-ingredient HMs, indicating compliance with the Food and Drug Regulations and the aforementioned guidance documents (GMPs, labeling standard and indications for use).

Since January of 2004, HMs continue to be regulated by Health Canada as drug products under the Food and Drugs Act and Natural Health Product Regulations. Should you have any questions about the regulatory status of HMs, we invite you to contact the Natural Health Products Directorate, Health Products and Food Branch, Health Canada (<http://www.hc-sc.gc.ca/ahc-asc/branch-dirgen/hpfb-dgpsa/nhpd-dpsn/index-eng.php>).

The fact is that the safety and efficacy of homeopathic medicines are clearly established in Canada and elsewhere. There is no question of credibility, notwithstanding what your program segment and related promotional web site content might suggest.

As for the practice of homeopathy and use of homeopathic medicines in naturopathy and other health care disciplines, we place our trust in the pertinent professional associations to speak for themselves. Several such associations are copied on this correspondence, as is Health Canada.

Yours sincerely,



Majid Djoudi
President, APHC-CHPA

- cc. Meena Ballantyne, Assistant Deputy Minister, Health Products and Food Branch, Health Canada
SPHQ Syndicat Professionnel des Homéopathes du Québec
Ontario Homeopath Association
Canadian Society of Homeopaths
West Coast Homeopathic Society
Canadian Association of Naturopathic Doctors