

June 11, 2008

The Right Honourable Stephen Harper P.C., M.P.  
Prime Minister of Canada  
House of Commons  
Ottawa, Ontario K1A 0A6

Dear Prime Minister:

**Re: Bill C-51**

We, The National Council of Women of Canada, wish to address major concerns we have with Bill C-51. We believe that this bill has broad implications for the natural health product industry and that it is being implemented without necessary and proper public input. Our policy states that the Government of Canada direct Health Canada to involve the public in the development of health policy by making available to interested groups and individuals information to facilitate participation in the formation of health policy.

Bill C-51 contains excessive regulation of natural health products as well as unfair comparisons with pharmaceutical companies. Natural health products remain drugs under the Act, however, all drugs are now referred to as "therapeutic products" in the Act. The expanded definition of "sell" has also raised red flags, as it could result in prosecution of natural health practitioners, including naturopathic and homeopathic doctors.

In this Bill, defining "government" to include foreign states or international organizations of states is important because of a change made in Section 30 of the Act. We understand that this change would allow the federal government to make documents prepared by foreign governments or bodies law in Canada simply by passing a regulation incorporating the document. For example, the CODEX treaty could become law without Parliamentary approval by simply passing a regulation saying it is now part of our regulations.

This change to allow the federal cabinet to incorporate documents from foreign governments or organizations as law by referring to them in regulations will remove Parliamentary scrutiny on issues affecting the natural health products industry.

We strongly urge the Government of Canada to address the major concerns that we and many other groups and individuals have expressed with regard to Bill C-51.

Sincerely,

Karen Dempsey,  
NCWC President

cc: The Hon. Jack Layton, New Democratic Party  
Mr. Gilles Dusceppe, Bloc Québécois  
The Hon. Stephane Dion, Liberal Party of Canada

***The National Council of Women of Canada*** is a federation comprised of Local Councils, Provincial Councils, and National Organizations. Founded in 1893, it was incorporated by an Act of Parliament in 1914 and has been designated by the Government of Canada as being of national historic significance for its role in Canadian women's history. For more information, consult our web site at [www.ncwc.ca](http://www.ncwc.ca) or contact our national office at #205, 251 Bank Street, Ottawa, Ontario, K2P 1X3.