



Budget 2015 Submission from the Canadian Association of Naturopathic Doctors

Canada faces a prescription opioid abuse crisis. The use and misuse of psychoactive medicines is a growing problem. Some may even call it an epidemic. The government of Canada fully recognizes the dangers of these highly addictive drugs and has taken new action to help protect Canadians. From hosting symposiums on prescription drug abuse, working with the provinces/territories to find solutions and issuing a national Call for Proposals to improve the prescribing practices for prescription drugs that have a high risk of abuse or addiction, this government is taking national leadership.

What many policy decision makers may not know is that Canadians, across the country, are seeking support, guidance and primary care from naturopathic doctors (NDs). Some are looking to eliminate prescription drug use; others are seeking valid alternatives to strong medications with debilitating side effects. Given the education, training and expertise of NDs in pharmacology and pharmacognosy (the identification and study of interaction of botanical constituents and active ingredients), NDs offer Canadians real solutions to a growing problem. **Managing, reducing and in some cases eliminating prescription drug use is common practice amongst naturopathic doctors; and the demand for their services is only increasing.**

Patients, tired of their drug dependence and anxious for assistance, are going outside the publicly funded health care system to seek help from NDs. Many have been fighting the battle for years, some hiding their addiction from loved ones, friends, colleagues and even their medical doctors. Many patients have documented feeling more comfortable resolving health issues with an ND. Naturopathic doctors take an individualized approach, evaluating a patient's medical issues and all the factors impacting their health in order to design and execute a treatment plan specific to the patient. They understand when medication may be required for pain management, for palliative care, and certainly when there are non-drug options. Although constrained in how NDs can access or recommend controlled drugs, there is no barrier in terms of education, skill and expertise.

Naturopathic medicine has a long record of safe, effective care, particularly with safe prescribing and monitored reduction of addictive substances. The results can be astonishing. **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 may find 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.

In these situations, the intent of an ND or general practitioner (GP) is not dissimilar: Ensure patient-centred, best practices in primary care practice. But unlike GPs, NDs face a significant barrier to providing timely, effective care: The ability to access federally controlled drugs, particularly for those patients addicted to opioids.

Weaning a patient off a controlled substance requires a thoroughly wholistic approach addressing not only nutritional and pharmacologic needs but personal, family and social issues as well. Specifically it will also require the ability to reduce the patient's dose of the controlled drug and even manage with other medicines at intervals during treatment as the patient requires reduced amounts over time. Unable to access these controlled substances NDs may have no alternative but to request their patients also seek care from a GP or walk in clinic. This results in restrictive treatment for the patient, significantly limiting his or her ability to overcome the addiction, and in some instances invites complications putting a patient at risk.

The Federal Budget Request

Naturopathic doctors are requesting the federal government remove the barrier that prevents provinces and territories from choosing to allow NDs to prescribe and administer selected drugs containing legal controlled substances, including medical marijuana, to ensure the optimal treatment of patients and to assist patients in reducing or eliminating their drug dependency.

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.

Including NDs in federal regulations removes a barrier to treatment while providing the provinces and territories with effective tools to combat prescription drug abuse, particularly in those provinces where NDs have prescribing authority.

Medicinal *Cannabis* is a tool that will assist NDs in the treatment of their patients with drug addiction and in the treatment of serious and chronic diseases where the medicinal *Cannabis* can provide optimal patient outcomes, more so in some cases, than highly addictive prescription medication. Many patients dependent on opiates for management of their cancer or chronic pain have found that by using *Cannabis* medicines, 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. Access to prescribe medicinal *Cannabis* can be provided to naturopathic doctors under the same *New Classes of Medical Practitioners* Regulations that granted access to nurse practitioners.

Given that naturopathic doctors have the education, medical training, and expertise in the botanical medicine sciences, they are in a unique position to prescribe medical *Cannabis* to combat prescription drug abuse, or to provide pain relief in order to avoid the need for addictive prescription pain medication in the first place. It is this expertise that enables appropriate precise application of medicines ranging from individual standardized botanical constituents to the complexity of effectively using whole plant medicines. Naturopathic doctors can prescribe with confidence. In fact, given this expertise, NDs are more commonly being asked for advice by conventional palliative and chronic pain medical clinics across the country: their clinics are overcrowded and they are seeing the positive outcomes resulting from the services provided by professional relationships with NDs.

Naturopathic doctors are regulated in five provinces with other provinces soon to follow. Each province has its own regulatory college. Earlier this year, the federal government recognized the value of NDs as primary care providers and eliminated the GST/HST on their services.

On behalf of its members, the Canadian Association of Naturopathic Doctors is asking the federal government to work with naturopathic doctors - primary care providers and experts in natural medicines, who have been successfully assisting patients in reducing their dependency on prescription drugs addiction for decades - to remove barriers and allow naturopathic doctors to play an important role in combatting the opioid abuse crisis in Canada. **We would welcome the opportunity to testify before the House of Commons Finance Committee during its pre-budget consultation in Vancouver, Toronto, or if required, any other suitable location.**

Incorporated in 1955, the CAND is the not-for profit national association representing regulated (or in unregulated jurisdictions, those who meet the criteria for regulation) naturopathic doctors across Canada. Currently the CAND represents 85 per cent of the 2,040 NDs practicing in Canada. **For further information**, please contact: Shawn O'Reilly, Executive Director, 416.496.8633 or soreilly@cand.ca