

# Submission to the Standing Committee on the Status of Women (FEWO)



chfa<sup>®</sup> 



Health Canada needs to **halt** anticipated regulatory changes impacting Natural Health Products (NHPs) and **reset** priorities based on proper consultations with key stakeholders, to ensure that the NHP framework is well-informed, balanced, and in the **best interest** of Canadians.



# About CHFA

The Canadian Health Food Association (CHFA) is the largest Canadian organization dedicated to natural health and organic products. Our members consist of over 1000 businesses across Canada, including manufacturers, retailers, wholesalers, distributors, and importers of Natural Health Products (NHPs).

The NHP industry is a **\$5.5 billion industry**, supporting over **54,000 jobs**, many of which are at small-to-medium-sized businesses.

After accounting for the full supply chain and increased economic spending, its total footprint is estimated at **\$11 billion of the GDP.**

# About the Industry

- Although the exact number of women-owned or women-led NHP companies is unknown, **17% of companies attending CHFA's upcoming trade show are women-owned.**
- Women are also the driving force behind Canada's direct selling industry, **where 84% of Canadian sellers identify as a woman and NHPs make up 29% of their sales.**
- Women-owned NHP business continue to be **leaders in responding to and meeting women's health needs.**



**As a result** of regulatory changes, the NHP industry is now in **crisis.**



# Regulatory Changes

- New, inflexible labelling requirements come into force in June, 2025
- Proposed Fees on Natural Health Products (cost recovery) would come into force in April 2025
- Bill C-47 extended pharmaceutical legislative powers to NHPs in 2023

# The proposed Cost Recovery Fees would have far-reaching impacts.

- Although Gender-Based Analysis is strongly recommended as part of regulatory development, Health Canada failed to follow the TBS Cabinet Directive on Regulation which will directly impact both women-led business and consumers.
- A large portion of the fees are for future Regulatory infrastructure, rendering the fees an illegal tax.







# Impact on Industry

An independent analysis\* of the industry found that:

- **83%** of industry respondents will **struggle** to absorb the **costs** of legislative changes.
- **76%** of industry respondents indicate **high likelihood of product removal from Canada.**
- **66%** say employment will suffer, resulting in devastating **job loss.**

\* Data sourced from an analysis of labelling changes produced by Deloitte, released prior to cost recovery proposals.



There are **severe** consequences for small- and medium-sized businesses.

Industry respondents agree that these regulations are making them consider **shutting down operations** in Canada.

Simply put,  
**1 in 5**  
**businesses**  
**are at risk of closing.**



## Consequences for Consumers

Amidst a growing healthcare crisis, Canadians are increasingly health-conscious and reliant on NHPs for maintaining their everyday health and wellness.

- NHPs are used by over **80%** of Canadians.
- According to Stats Canada, women are **more likely** to use NHPs to manage their health and wellness.
- **99%** of NHP users in Canada feel that these products are **safe** and **accessible**.

Proposed regulations will **remove** products Canadians depend on, **limiting** access to safe and reliable products that support health and wellness.

# We care about the safety of Canadians.

An independent analysis of the safety of NHPs marketed in Canada found that NHPs have an **acceptable** and **low-risk** safety profile compared to pharmaceuticals or medical devices.







But Health Canada's proposed regulations means **raised prices, reduced availability** of compliant Canadian products, and increased purchasing of **unapproved foreign products** with unknown, untested side effects. This could have **severe consequences** for the health and well-being of Canadians.

# Environmental Impact

- Health Canada's proposed changes to labelling requirements for NHPs will also have **negative** consequences for the environment.
- To accommodate for larger labels, packaging size will be forced to increase, requiring **significant adjustments** to the manufacturing process.
- This means *more* raw wood use, *more* chemicals, *more* labour, and *more* trucks on the road, for **less overall output** at a **higher cost**.



# Proposed changes to labelling would turn this...

**Recommended Dose (Adults 19 year and older):** Mix one scoop into 250 mL of water or juice. Take once daily, with food a few hours before or after taking other medications. For use beyond 12 weeks, consult a health care practitioner.

**Recommended Use:** A source of antioxidants for the maintenance of good health.

**Warnings:** Do not use if you are pregnant or breastfeeding. Consult a health care practitioner prior to use if you are taking blood thinners or any other medications or natural products, if you have an iron deficiency, a liver disorder or have a history of kidney stones. Hypersensitivity has been known to occur, in which case, discontinue use. Some people may experience mild gastrointestinal disturbances. Rare, unpredictable cases of liver injury associated with green tea extract-containing products have been reported (in Canada and internationally). Stop use and consult a health care practitioner if you develop symptoms of liver trouble such as yellowing of the skin/eyes (jaundice), stomach pain, dark urine, sweating, nausea, unusual tiredness, and/or loss of appetite.

**STORE AT ROOM TEMPERATURE IN A COOL, DRY PLACE.**

**KEEP OUT OF REACH OF CHILDREN.**

**DO NOT USE IF SECURITY SEAL IS BROKEN.**

**Dose recommandée (adultes à partir de 19 ans):** Mélanger une mesure à 250 mL d'eau ou de jus. Prendre une fois par jour avec des aliments, à quelques heures d'intervalle des médicaments. Pour un usage prolongé au-delà de 12 semaines, consulter un praticien de soins de santé.

**Usage recommandé:** Source d'antioxydants pour le maintien de la santé.

**Mises en garde:** Contre-indiqué pendant la grossesse ou l'allaitement. Consulter un praticien de soins de santé avant emploi pendant la prise d'anticoagulants ou de tout autre médicament ou produit de santé naturel, en présence de calculs en fer, de trouble hépatique ou d'antécédents de calculs rénaux. Une hypersensibilité peut se manifester, dans un tel cas, cesser l'emploi. Peut provoquer de légères maux de gastro-intestinaux chez certains utilisateurs. De rares cas imprévisibles de trouble hépatique associé aux produits contenant de l'extrait de thé vert ont été signalés (au Canada et à travers le monde). Cesser l'emploi et consulter un praticien de soins de santé à l'apparition de symptômes de trouble hépatique tels que le jaunissement de la peau/des yeux (jaunisse), les douleurs gastriques, l'urine foncée, la transpiration, les nausées, une fatigue inhabituelle et/ou la perte d'appétit.

**CONSERVER À LA TEMPÉRATURE AMBIANTE, AU FRAIS ET AU SEC. GARDER HORS DE LA PORTÉE DES ENFANTS.**

**NE PAS UTILISER SI LE DISPOSITIF D'INVOLABILITÉ EST BRISÉ.**



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Healthy Time Inc.  
Los Angeles, CA 90210  
USA

Importer / Importateur:  
Healthy Time Canada Inc.  
Ottawa, ON K1P 1C3  
www.healthyme.ca

LOT & EXP. DATE:  
LOT ET DATE D'EXPIRATION:

123456 JN2027

Healthy Time

## Greens Aliments verts

Mango-passionfruit flavour  
Arôme de mangue-fruit de la passion

Vegan  
Whole food  
ingredients  
Botanicals and  
vegetables

Végétalien  
Ingrédients  
alimentaires entiers  
Plantes et  
légumes

500g POWDER  
DE POUDRE

NPN XXXXXXXX

Medicinal Ingredients (Each 9g scoop contains)	Amount	Ingrédients médicinaux (9 g chaque mesure contient)	Amount
Soy Lecithin (Glycine max, seed)	1500 mg	Lécithine de soja (Glycine max, grain)	1500 mg
Organic Brown Rice (Oryza sativa, Seed)	1000 mg	Riz brun biologique (Oryza sativa, grain)	1000 mg
Spirulina platensis (Whole)	1000 mg	Spirulina platensis (entière)	1000 mg
Inulin (Helianthus tuberosus, Tuber)	1000 mg	Inuline (Helianthus tuberosus, tubercule)	1000 mg
Banley Grass (Hordeum vulgare, Leaf)	750 mg	Herbe d'orge (Hordeum vulgare, feuille)	750 mg
Organic Alfalfa (Medicago sativa, Herb Top)	500 mg	Luzerne biologique (Medicago sativa, parties aériennes)	500 mg
Organic Beet Root (Beta vulgaris)	250 mg	Tubercule de betterave biologique (Beta vulgaris)	250 mg
Organic Carrot (Daucus carota, Root)	250 mg	Carotte biologique (Daucus carota, tubercule)	250 mg
Chlorella vulgaris (Broken Cell)	250 mg	Chlorella vulgaris (paroi cellulaire fissurée)	250 mg
Organic Flax Seed Oil (Linum usitatissimum)	100 mg	Huile de graines de lin biologiques (Linum usitatissimum)	100 mg
Wheat Grass (Triticum aestivum, Leaf)	100 mg	Herbe de blé (Triticum aestivum, feuille)	100 mg
Organic Broccoli (Brassica oleracea var. italica, Flower)	100 mg	Brocoli biologique (Brassica oleracea var. italica, fleur)	100 mg
Acacia Extract S1 (Mehragia glabra, Fruit)	100 mg	Acacia, extrait S1 (Mehragia glabra, fruit)	100 mg
Organic Apple Pectin (Malus pumila, Fruit)	100 mg	Pectine de pomme biologique (Malus pumila, fruit)	100 mg
Organic Spinach (Spinacia oleracea, Leaf)	75 mg	Épinard biologique (Spinacia oleracea, feuille)	75 mg
Buckwheat (Fagopyrum esculentum, Seed)	75 mg	Sarrasin (Fagopyrum esculentum, grain)	75 mg
Organic Cranberry (Vaccinium macrocarpon, Fruit)	75 mg	Canneberge biologique (Vaccinium macrocarpon, fruit)	75 mg
Organic Cauliflower (Brassica oleracea var. botrytis, Flower)	50 mg	Chou-fleur biologique (Brassica oleracea var. botrytis, inflorescence)	50 mg
Organic Brussels Sprouts (Brassica oleracea var. gemmifera, Sprouts)	50 mg	Chou de Bruxelles biologique (Brassica oleracea var. gemmifera, chou)	50 mg
Organic Kale (Brassica oleracea var. viridis, Leaf)	50 mg	Chou frisé biologique (Brassica oleracea var. viridis, feuille)	50 mg
Watercress (Nasturtium officinale, Leaf)	50 mg	Cresson (Nasturtium officinale, feuille)	50 mg
Astragalus membranaceus (Root)	50 mg	Astragalus membranaceus (racine)	50 mg
Organic Blueberry (Vaccinium angustifolium, Fruit)	50 mg	Blueberry biologique (Vaccinium angustifolium, fruit)	50 mg
Fringe Tree (Chiocanthus virginicus, Root Bark)	50 mg	Chiocanthus de Virginie (Chiocanthus virginicus, écorce de racine)	50 mg
Oat Bran (Avena sativa, Husk)	50 mg	Son d'avoine (Avena sativa, cosse)	50 mg
Organic Pineapple (Ananas comosus var. comosus, Fruit)	50 mg	Ananas biologique (Ananas comosus var. comosus, fruit)	50 mg
Organic Papaya (Carica papaya, Fruit)	50 mg	Papaye biologique (Carica papaya, fruit)	50 mg
Dulse (Palmaria palmata, Thallus)	25 mg	Dulse (Palmaria palmata, thalle)	25 mg
Quercetin (Stylobolium japonicum, Flower)	25 mg	Quercétine (Stylobolium japonicum, fleur)	25 mg
Hawthorn Berry (Crataegus laevigata)	25 mg	Baie d'aubépine (Crataegus laevigata)	25 mg
Pumpkin Seed Oil (Cucurbita pepo)	20 mg	Huile de graine de citrouille (Cucurbita pepo)	20 mg
Evening Primrose Oil (Oenothera biennis, Seed)	20 mg	Huile d'ongre (Oenothera biennis, grain)	20 mg
Safflower Oil (Carthamus tinctorius, Seed)	20 mg	Huile de carthame (Carthamus tinctorius, grain)	20 mg
Dandelion Leaf (Taraxacum officinale)	20 mg	Feuille de pissenlit (Taraxacum officinale)	20 mg
Celery Seed (Apium graveolens var. dulce)	20 mg	Graine de céleri (Apium graveolens var. dulce)	20 mg
Pumpkin Seed (Cucurbita pepo)	20 mg	Graine de citrouille (Cucurbita pepo)	20 mg
Kelp (Ascophyllum nodosum, Thallus)	20 mg	Varech (Ascophyllum nodosum, thalle)	20 mg
Wakame (Undaria pinnatifida, Thallus)	20 mg	Wakamé (Undaria pinnatifida, thalle)	20 mg
Nori (Porphyra yezoensis, Thallus)	20 mg	Nori (Porphyra yezoensis, thalle)	20 mg
Milk Thistle (Silybum marianum, Fruit)	20 mg	Chardon-Marie (Silybum marianum, fruit)	20 mg
Siberian Ginseng (Eleutherococcus senticosus, Root)	20 mg	Ginseng de Sibérie (Eleutherococcus senticosus, rhizome)	20 mg
Ginkgo biloba (Leaf)	20 mg	Ginkgo biloba (feuille)	20 mg
Green Tea Extract S1 (Camellia sinensis, Leaf)	20 mg	Thé vert, extrait S1 (Camellia sinensis, feuille)	20 mg
Bilberry Extract S1 (Vaccinium myrtillus, Fruit)	20 mg	Myrtille, extrait S1 (Vaccinium myrtillus, fruit)	20 mg
Grape Seed Extract S1 (Vitis vinifera)	20 mg	Pépins de raisin, extrait S1 (Vitis vinifera)	20 mg
Nettle (Urtica dioica, Herb Top)	20 mg	Ortie (Urtica dioica, parties aériennes)	20 mg
Lycopers (Solanum lycopersicum, Fruit)	5 mg	Lycopers (Solanum lycopersicum, fruit)	5 mg
Resveratrol (Vitis vinifera, Fruit)	5 mg	Resvératrol (Vitis vinifera, fruit)	5 mg
Piperine (Piper nigrum, Fruit)	2 mg	Pipérine (Piper nigrum, fruit)	2 mg
Lutein (Tagetes erecta, Flower)	1 mg	Lutéine (Tagetes erecta, fleur)	1 mg

**Non-medicinal ingredients:** Siralio grosvenorii Fruit Extract, Organic Mango Flavour, Organic Passionfruit Flavour, Citric Acid, Malic Acid, Malto-dextrin, Xanthan Gum.

**Ingrédients non médicinaux:** Extrait de fruit de Siralio grosvenorii, arôme de mangue biologique, arôme de fruit de la passion biologique, acide citrique, acide malique, maltodextrine, gomme xanthane.



# ...into this:

Healthy Time

## Greens Aliments verts

Mango-passionfruit flavour  
Arôme de mangue-fruit de la passion

Vegan  
Whole food ingredients  
Botanicals and vegetables

Végétalien  
Ingrédients alimentaires entiers  
Plantes et légumes

500g POWDER  
DE POUDRE

NPN XXXXXXXX

LOT & EXP. :  
123456 JIN2027



### Product Facts/Info-produit

**Medicinal ingredients/Ingrédients médicinaux** Each scoop contains / chaque mesure contient

Soy lecithin (Glycine max) (seed) 1500 mg / Lécithine de soja (Glycine max) (graine) 1500 mg • Brown rice (Oryza sativa) (seed) 1000 mg / Riz brun (Oryza sativa) (graine) 1000 mg • Spirulina platensis (whole) 1000 mg / Spirulina platensis (entière) 1000 mg • Inulin (Helianthus tuberosus) (tuber) 1000 mg / Inuline (Helianthus tuberosus) (tubercule) 1000 mg • Barley grass (Hordeum vulgare) (leaf) 750 mg / Herbe d'orge (Hordeum vulgare) (feuille) 750 mg • Alfalfa (Medicago sativa) (herb top) 500 mg / Luzerne (Medicago sativa) (parties aériennes) 500 mg • Beet root (Beta vulgaris) 250 mg / Tubercule de betterave (Beta vulgaris) 250 mg • Carrot (Daucus carota) (root) 250 mg / Carotte (Daucus carota) (tubercule) 250 mg • Chlorella vulgaris (Broken cell) 250 mg / Chlorella vulgaris (Paroi cellulaire fissurée) 250 mg • Flax seed oil (Linum usitatissimum) 100 mg / Huile de graines de lin (Linum usitatissimum) 100 mg • Wheat grass (Triticum aestivum) (leaf) 100 mg / Herbe de blé (Triticum aestivum) (feuille) 100 mg • Broccoli (Brassica oleracea var. italica) (flower) 100 mg / Brocoli (Brassica oleracea var. italica) (fleur) 100 mg • Acerola extract (Malpighia glabra) (fruit) 100 mg / Acérola (Malpighia glabra) (fruit) 100 mg • Apple pectin (Malus pumila) (fruit) 100 mg / Pectine de pomme (Malus pumila) (fruit) 100 mg • Spinach (Spinacia oleracea) (leaf) 75 mg / Épinard (Spinacia oleracea) (feuille) 75 mg • Buckwheat (Fagopyrum esculentum) (seed) 75 mg / Sarrasin (Fagopyrum esculentum) (graine) 75 mg • Cranberry (Vaccinium macrocarpon) (fruit) 75 mg / Canneberge (Vaccinium macrocarpon) (fruit) 75 mg • Cauliflower (Brassica oleracea var. botrytis) (flower) 50 mg / Chou-fleur (Brassica oleracea var. botrytis) (inflorescences) 50 mg • Brussel sprouts (Brassica oleracea var. gemmifera) (sprouts) 50 mg / Chou de Bruxelles (Brassica oleracea var. gemmifera) (chou) 50 mg • Kale (Brassica oleracea var. viridis) (leaf) 50 mg / Chou frisé (Brassica oleracea var. viridis) (feuille) 50 mg • Watercress (Nasturtium officinale) (leaf) 50 mg / Cresson (Nasturtium officinale) (feuille) 50 mg • Astragalus membranaceus (root) 50 mg / Astragalus membranaceus (racine) 50 mg • Blueberry (Vaccinium angustifolium) (fruit) 50 mg / Bleuets (Vaccinium angustifolium) (fruit) 50 mg • Fringe tree (Chionanthus virginicus) (root bark) 50 mg / Chionanthe de Virginie (Chionanthus virginicus) (écorce de racine) 50 mg • Oat bran (Avena sativa) (husk) 50 mg / Son d'avoine (Avena sativa) (cosse) 50 mg • Pineapple (Ananas comosus var. comosus) (fruit) 50 mg / Ananas (Ananas comosus var. comosus) (fruit) 50 mg • Papaya (Carica papaya) (fruit) 50 mg / Papaye (Carica papaya) (fruit) 50 mg • Dulce (Palmaria palmata) (thallus) 25 mg / Dulce (Palmaria palmata) (thalle) 25 mg • Quercetin (Styphnolobium japonicum) (flower) 25 mg / Quercétine (Styphnolobium japonicum) (fleur) 25 mg • Hawthorn berry (Crataegus laevigata) 25 mg / Baie d'aubépine (Crataegus laevigata) 25 mg • Pumpkin seed oil (Cucurbita pepo) 20 mg / Huile de graine de citrouille (Cucurbita pepo) 20 mg • Evening primrose oil (Oenothera biennis) (seed) 20 mg / Huile d'onagre (Oenothera biennis) (graine) 20 mg • Safflower oil (Carthamus tinctorius) (seed) 20 mg / Huile de carthame (Carthamus tinctorius) (graine) 20 mg • Dandelion leaf (Taraxacum officinale) 20 mg / Feuille de pissenit (Taraxacum officinale) 20 mg • Celery seed (Apium graveolens var. dulce) 20 mg / Graine de céleri (Apium graveolens var. dulce) 20 mg • Pumpkin seed (Cucurbita pepo) 20 mg / Graine de citrouille (Cucurbita pepo) 20 mg • Kelp (Ascophyllum nodosum) (thallus) 20 mg / Varech (Ascophyllum nodosum) (thalle) 20 mg • Wakame (Undaria pinnatifida) (thallus) 20 mg / Wakamé (Undaria pinnatifida) (thalle) 20 mg • Nori (Porphyra yezoensis) (thallus) 20 mg / Nori (Porphyra yezoensis) (thalle) 20 mg • Milk thistle (Silybum marianum) (fruit) 20 mg / Chardon-Marie (Silybum marianum) (fruit) 20 mg • Siberian ginseng (Eleutherococcus senticosus) (root) 20 mg / Ginseng de Sibérie (Eleutherococcus senticosus) (rhizome) 20 mg • Ginkgo biloba (leaf) 20 mg / Ginkgo biloba (feuille) 20 mg • Green tea (5:1 extract) (Camellia sinensis) (leaf) 20 mg (équivalent à 100 mg de green tea) / Thé vert (5:1 extract) (Camellia sinensis) (feuille) 20 mg (équivalent à 100 mg de thé vert) • Bilberry (5:1 extract) (Vaccinium myrtillus) (fruit) 20 mg (équivalent à 100 mg de bilberry) / Myrtille (5:1 extract) (Vaccinium myrtillus) (fruit) 20 mg (équivalent à 100 mg de myrtille) • Grape seed (5:1 extract) (Vitis vinifera) 20 mg (équivalent à 100 mg of grapeseed) / Pépins de raisin (5:1 extract) (Vitis vinifera) 20 mg (équivalent à 100 mg de pépins de raisin) • Nettle (Urtica dioica) (herb top) 20 mg / Ortie (Urtica dioica) (parties aériennes) 20 mg • Lycopene (Solanum lycopersicum) (fruit) 5 mg / Lycopène (Solanum lycopersicum) (fruit) 5 mg • Resveratrol (Vitis vinifera) (fruit) 5 mg / Resvératrol (Vitis vinifera) (fruit) 5 mg • Piperine (Piper nigrum) (fruit) 2 mg / Pipérine (Piper nigrum) (fruit) 2 mg • Lutein (Tagetes erecta) (flower) 1 mg / Lutéine (Tagetes erecta) (fleur) 1 mg

### Uses/Usages

A source of antioxidants for the maintenance of good health / Source d'antioxydants pour le maintien de la santé

For full Product Facts table, peel back label / Pour le tableau Info-produit complet, décollez l'étiquette

### Product Facts (continued)/Info-produit (suite)

#### Warnings/Mises en garde

**Do not use/Ne pas utiliser** if you are pregnant or breastfeeding / pendant la grossesse ou l'allaitement

**Ask a health care practitioner before use/Consultez un praticien de soins de santé avant l'utilisation** if you are taking blood thinners or any other medications or natural products, if you have an iron deficiency, a liver disorder or have a history of kidney stones / pendant la prise d'anticoagulants ou de tout autre médicament ou produit de santé naturel, en présence de carence en fer, de trouble hépatique ou d'antécédents de calculs rénaux

**When using this product/Lorsque vous utilisez ce produit** hypersensitivity has been known to occur, in which case, discontinue use / une hypersensibilité peut se manifester; dans un tel cas, cessez l'emploi • some people may experience mild gastrointestinal disturbances / peut provoquer de légères malaises gastro-intestinaux chez certains utilisateurs • rare, unpredictable cases of liver injury associated with green tea extract-containing products have been reported (in Canada and internationally) / de rares cas imprévisibles de trouble hépatique associé aux produits contenant de l'extrait de thé vert ont été signalés (au Canada et à travers le monde)

**Stop use and ask a health care practitioner/Cessez d'utiliser et consultez un praticien de soins de santé** if you develop symptoms of liver trouble such as yellowing of the skin/eyes (jaundice), stomach pain, dark urine, sweating, nausea, unusual tiredness, and/or loss of appetite / à l'apparition de symptômes de trouble hépatique tels que le jaunissement de la peau/des yeux (jaunisse), les douleurs gastriques, l'urine foncée, la transpiration, les nausées, une fatigue inhabituelle et/ou la perte d'appétit

**Keep out of reach of children/Gardez hors de la portée des enfants**

#### Directions/Mode d'emploi

Adults 19 year and older: Mix one scoop into 250 mL of water or juice Take once daily, with food a few hours before or after taking other medications. For use beyond 12 weeks, consult a health care practitioner / Adultes à partir de 19 ans : Mélanger une mesure à 250 mL d'eau ou de jus Prendre une fois par jour avec des aliments, à quelques heures d'intervalle des médicaments. Pour un usage prolongé au-delà de 12 semaines, consulter un praticien de soins de santé

#### Other information/Autres renseignements

Store at room temperature in a cool, dry place • Do not use if security seal is broken / Conserver à la température ambiante, au frais et au sec • Ne pas utiliser si le dispositif d'intégrité est brisé

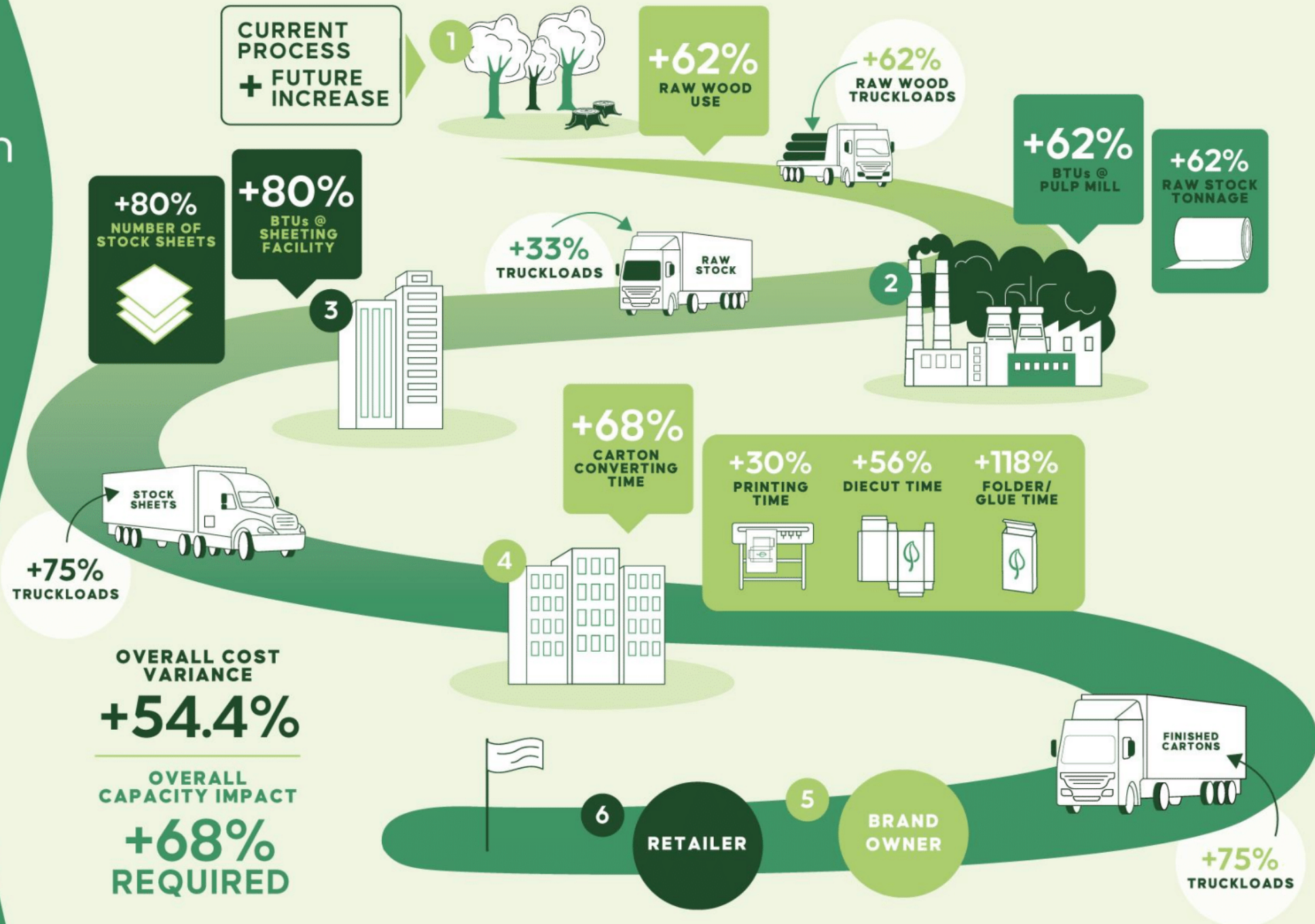
#### Non-medicinal ingredients/Ingrédients non médicinaux

Siraitia grosvenorii fruit extract / Extrait de fruit de Siraitia grosvenorii • Mango flavour / Arôme de mangue • Passionfruit flavour / Arôme de fruit de la passion • Citric acid / Acide citrique • Malic acid / Acide malique • Maltodextrin / Maltodextrine • Xanthan gum / Gomme xanthane

**Questions? Web / Web** www.healthytime.ca Mail / Par la poste Healthy Time Los Angeles, CA 90210, USA

# Case Study: Current Carton vs. Future Carton Environmental Impacts

After Natural Health  
Product (NHP)  
Labelling Changes


















# Detailed Environmental Breakdown

## Raw Paperboard Material



Case study based on annual volume of 1.5 million

Environmental impact estimates were made using the Environmental Paper Network Paper Calculator Version 3.2.1  
For more information visit [www.papercalculator.com](http://www.papercalculator.com)

	CURRENT	FUTURE	
<b>PACKAGING FOOTPRINT (SQ. INCHES)</b>	 <b>80.93"</b>	 <b>116.86"</b>	 <b>+44% SIZE INCREASE</b>
<b>WOOD USE</b>	<b>170 TONS</b>	<b>275 TONS</b>	 <b>+676 MORE TREES USED</b>
<b>NET ENERGY</b>	<b>1,501 MILLION BTUS</b>	<b>2,430 MILLION BTUS</b>	 <b>EQUIVALENT OF +10 HOMES PER YEAR</b>
<b>PURCHASED ENERGY</b>	<b>1,050 MILLION BTUS</b>	<b>1,700 MILLION BTUS</b>	 <b>EQUIVALENT OF +7 HOMES PER YEAR</b>
<b>GREENHOUSE GASES CO2 EQUIV.</b>	<b>268,636 LBS</b>	<b>434,934 LBS</b>	 <b>EQUIVALENT OF +15 CARS PER YEAR</b>
<b>SOLID WASTE</b>	<b>88,683 LBS</b>	<b>143,582 LBS</b>	 <b>ABOUT +2 GARBAGE TRUCKS</b>
<b>NITROGEN OXIDES</b>	<b>443 LBS</b>	<b>717 LBS</b>	 <b>EQUIVALENT OF AN 18-WHEELER PER YEAR</b>
<b>SULFUR DIOXIDE</b>	<b>1,219 LBS</b>	<b>1,974 LBS</b>	 <b>EQUIVALENT OF +137 18-WHEELERS PER YEAR</b>
<b>PARTICULATES</b>	<b>275 LBS</b>	<b>445 LBS</b>	 <b>EQUIVALENT OF +15 BUSES PER YEAR</b>
<b>HAZARDOUS AIR POLLUTANTS (HAP)</b>	<b>129 LBS</b>	<b>208 LBS</b>	 <b>+79 LBS</b> ↑
<b>VOLATILE ORGANIC COMPOUNDS (VOCs)</b>	<b>134 LBS</b>	<b>216 LBS</b>	 <b>+82 LBS</b> ↑



# Recommendation

It is **imperative** that these changes are **halted immediately**.

The Minister of Health must **work with industry** to re-examine their approach and **reset their priorities**.

Thorough, ongoing consultations with key stakeholders must be conducted to develop policies that are **well-informed, balanced,** and in the **best interest** of Canadians.



chfa<sup>®</sup>

**When We All Do Well, Canadians Live Well.**

