

## *From the Desk of Citizens for Choice in Healthcare*

***Partial documentation of products no longer available for domestic retail purchase in Canada since the 2004 implementation of Health Canada's Natural Health Products Regulations***



*Updated Summer 2013*

*From the Desk of Citizens for Choice in Healthcare...*



Below is a list of companies and/or products that used to be sold in Canada prior to the 2004 implementation of the Natural Health Product regulations. Following a seven year process, in which the number one request of Canadians, by far, was that they wanted increased access to a wider range of natural health products, and in which NHPs were supposed to have been given their own category, separate from either Foods or Drugs, Health Canada came out with the Natural Health Product Regulations.

Not only did these Regulations classify natural products as Drugs without providing the unique category, they were supposed to protect Canadians' access to NHP's.

As is reflected in the list below, they have had the opposite effect...

## *Reasons for Loss of Products...*



**A - Imported and U.S. lines/products withdrawn** from Canadian market due to regulatory and financial burden

**B - NPN application denied** due to lack of evidence or evidence not recognized by Health Canada

**C - Ingredient disallowed** – Forced withdrawal of all products on market containing one or more disallowed ingredients.

**D - Forced product reformulation** to achieve NPN requirements and remain on Canadian market (due to disallowed potencies and/or ingredient(s)).

**E - Products discontinued voluntarily** by Canadian manufacturers /distributors due to regulatory process and financial burden, i.e. slower selling products not able to justify the additional outlay of dollars and man-hours to license.

## **Reason A: products lost (partial list only): 12,819**

**U. S. Imports only - complete lines of products withdrawn from Canadian market due to regulatory and financial burden. See examples below.**

- **Allergy Research Products** – **657** extremely high quality natural products of all sorts – sold in Canada for more than ten years when discontinued.
- **Baywood Solutions** and Complete la Femme – entire line, **11** products
- **Bio-Allers** – complete line of homeopathic allergy formulations in tablets and drops – **17** skus
- **Country Life** – **297** high quality natural products in tablets and capsules sold for more than 10 years in Canada when discontinued
- **Dr. Christophers Original Formulas** -**214** herbal formulas sold in Canada since the 1970's. No longer able to be sold commercially because of the regulations.
- **EAS** – complete line **39** products
- **Eclectic Herbals** – from **81** products in 2003 to 35 in 2012... now have lost them all as Eclectic is not willing to spend the time, money and possible product reformulation to achieve NPN status
- **Futurebiotics** – complete line **89** products discontinued due to the Regulations
- **Gaia Herbals** – **304** herbal tincture skus – sold in Canada for more than 10 years... discontinued after the NHPD regs came into effect
- **HerbPharm** – **263** herbal tincture skus - sold in Canada for more than ten years... discontinued after the NHPD regs came into effect
- **Jarrow Formulas** – **242** products...only 10 available in Canada
- **Life Extension Products** – **493** extremely well researched NHP's no longer allowed into Canada for commercial sale

## *Reasons for Loss of Products...*

- **LifeTime** – lost access to **351** products, only the liquid Calcium/ Magnesium available
- **Lumina Health Products** – **5** products lost, left with 1
- **Natra Bio** – complete line of homeopathic formulas – **57** formulas
- **Natrol** – **1017** products sold in Canada for over a decade until the regulations went into effect in 2004.
- **Nature's Herbs** - **72** products sold since the 1980's. Discontinued when the Regulations started.
- **Robert Grey Cleansing products** - **26** products sold in Canada since the 1980's – have pulled out of Canada due to the regulations
- **Solaray, Kal, and all other products produced by Nutraceutical Inc.** – **5243** products offered in their US pricelists. Some of the best products anywhere in North America. Sold in Canada for more than ten years when discontinued. Did everything Health Canada asked of them for 4 years before having their site license denied by Health Canada. Gave up in frustration as they couldn't spend any more money on legal fees.
- **Source Naturals** – **2373** products in two lines representing a full range of nutraceuticals. Will no longer even ship to Canada period because of all the shipments held at the border
- **Twinlab supplements** - **124** products sold for decades prior to the regulations
- **Vitamin Research Products** - **457** innovative, well researched products sold in Canada since the 1980's. Refused entry into Canada since 2004
- **Vibrant Health** – lost **23** of 26 products, including UT Vibrance
- **Zand Herbals** – **364** products sold in Canada since the 1980's – pulled out of Canada after the regs went into effect

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## **Reason B: 32,288 products lost as of June 30, 2013**

**NPN application denied due to lack of scientific studies, or because the evidence presented was not recognized by Health Canada.** (With over 88,000 naturally occurring items in the human food chain, none of which are patentable, it is impractical to think that double-blind studies exist for all, or even the majority of them.)

After decades of safe sales and usage, **over 30,000 products submitted for licensing have failed to obtain an NPN through Health Canada** not because they were unsafe or ineffective, but because they failed to meet one specification or another. (**32,288** as of June 30 2013, source: most recent stats from Health Canada's NHPD ). Most were sold here for decades.

Examples by Company:

- **BioQuest Imports** – lost minimum of **7** products, company is only left with 2 products
- **Boericke & Tafel homeopathic remedies** – Alpha CF, Bronchitis & Asthma Aide, Children's Alpha CF, Alpha SH Sinus Headache, SciaticAide, Smoke Free
- **Nature's Way/Enzymatic Therapy** – 30 recently discontinued items due to Regulations; 59 additional with no probability of an NPN. Pricelist already dramatically shortened in 2004
- **Nutra Research** – has lost in excess of 100 products since Regulations began in 2004
- **Olbas - Olbas Oil** – 10ml, 50ml topical and Olbas Salve sold here since the 1970's
- **Professional Health Products** – lost over 40 products representing in excess of 50% of business
- **NOW Foods** – 53 products already discontinued due to regulations; more than 50 additional products currently in jeopardy of being refused.

## *Reasons for Loss of Products...*

- **Salus Tonics** – Salusan Herbal Nerve Tonic, Honey with Fennel Cough Syrup. Sold in Canada since the 1970's
- **Sambu Cleanse** – Elderberry Mini Cleanse 3 Day program, Elderberry Deep Cleanse 10 Day program. Sold since the 1970's
- **Shen Min Hair Regrowth line** – 7 products sold since the 1990's. NPNs refused
- **Similisan** – sold in Canada since the 1990's. lost 5 products, may lose entire line due to NPN refusals
- **Sweet Wheat** – high quality wheat grass products – no longer available due to regulations
- **Vaxa Vaxa** – entire line of products, 46 products including homeopathic formula for improving attention and cognition
- **Vita Plex** – Canadian company in existence since the 1970's – put out of business by the regulations – over 25 skus

## **Reason C:**

**Ingredient disallowed – all products on market containing them withdrawn, or reformulated often making them less effective.**

Examples:

- **Nattokinase** – Health Canada forced its withdrawal despite no reported problems or adverse events since its emergence onto the market in the 1990's. This **affected hundreds of products on the market** – withdrawn or reformulated to omit.
- **Emu oil** in capsule form, sold for years. Now only available for topical use
- **Pleurisy root** in any form
- **Shark liver oil extracts standardized for alkylglycerols** – available since the 1990's. Major benefits for protection from radiation. Rejected because all

## *From the Desk of Citizens for Choice in Healthcare...*

available human evidence is based on its applications for cancer, including protection while undergoing radiation therapy.

- **Choline alfoscerate**

### **Reason D:**

**Forced product reformulation to achieve NPN requirements and remain on Canadian market (due to disallowed ingredient(s) and/or potencies...virtually always less effective.**

Examples:

**Tracelabs Alcabase** – Highly effective alkalinizing mineral salt preparation... two forced reformulations. Less effective with each change.

**Sisu Magnesium Citrate with Malic Acid** – top selling magnesium formula. Forced reformulation as the malic acid was not bound directly to the magnesium.

**Absorb Science Viagreat-SX** – Highly effective libido enhancer and hormone balancer...forced reformulation...much less effective

**Nature's Sunshine HTP Power** – formerly very effective 5-Hydroxy Tryptophan Formula...ineffective after reformulation

Plus...

- **Countless multi ingredient formulas** such as multivitamin and mineral formulas with added greens, enzymes and mushrooms refused
- **Homeopathic remedies** – dog hair, cat hair, house dust, pollens mixture (one of these called Pollens 19 by Boiron, which contained Canadian and European pollens, was denied due to European content.
- **All vitamin D in doses higher than 1,000iu**
- **All folic acid in doses higher than 1mg**
- **All biotin in doses higher than 1mg**

**Note: There is no valid rationale for any of the above dosage limitations, all of which are widely available in the U.S.**



## *Reasons for Loss of Products...*

### **Reason E:**

**Thousands of products have been voluntarily discontinued both before and during the regulations because their sales did not justify the cost of compliance, or because it was deemed there was little chance of getting a license. Elimination of all slower selling products has dramatically decreased the variety of NHPs on the Canadian market. Repetitions of the same products now dominate.**

**The full list is much too extensive to reproduce. See examples below...**

Actifruit™ - <i>Nature's Way</i>
Activated Nasal Mist – Erythr/Xylitol - <i>NOW</i>
AKN™ Skin Care - <i>Nature's Way</i>
Aller-non - <i>Flora</i>
Alpha™ CF (Bonus Pack, tabs, liquid) - <i>Nature's Way</i>
Alpha™ SH Sinus - <i>Nature's Way</i>
Barley Grass - <i>Nature's Way</i>
Bee Pollen - <i>NOW</i>
Beet Root Powder - <i>Nature's Way</i>
Beta – 1, 3/1,6 – Glucan - <i>NOW</i>
Bio Pectin – modified citrus pectin- <i>Flora</i>
Boron - <i>NOW</i>
Boswellin Extract W/Curcumin - <i>NOW</i>
BP Cayenne-Goldenseal - <i>Nature's Way</i>
Brain B-12 Methylcobalamin - <i>NOW</i>
Brewers Yeast - <i>NOW</i>
Broad Spectrum™ Enzyme - <i>Nature's Way</i>
Broccology Sgs - <i>NOW</i>
Bronchitis & Asthma Aide™ - <i>Nature's Way</i>
Butcher's Broom Root – <i>Nature's Way</i>
Candida Clear - <i>NOW</i>
Cats Claw - <i>NOW</i>
Chickweed Herb - <i>Nature's Way</i>
Children's Alpha™ CF - <i>Nature's Way</i>
Cinnamon - <i>NOW</i>
Citrulline - <i>NOW</i>
Coenzyme B Complex New - <i>NOW</i>
Complete Liver Cleanse - <i>Nature's Way</i>
Cranberry - <i>Nature's Way</i>

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D-Flame Cox-2 Formula - <i>NOW</i>
D-Mannose - <i>NOW</i>
DMG - <i>NOW</i>
Doctor's Choice™ - <i>Nature's Way</i>
Doctor's Choice™ for Women MultiVitamin - <i>Nature's Way</i>
Doctor's Choice™ Prenatal Formula MultiVitamin - <i>Nature's Way</i>
Echinacea-Astragalus-Reishi - <i>Nature's Way</i>
Echinacea-Goldenseal Liquid - <i>Nature's Way</i>
Echinacea-Vitamin-C® - <i>Nature's Way</i>
Estrosoy™ - <i>Nature's Way</i>
Estrosoy™ & EstroSoyplus - <i>Nature's Way</i>
Eve Women's Multivitamin - <i>NOW</i>
Fisol™ Fish Oil - <i>Nature's Way</i>
Gaba - <i>NOW</i>
Garden Veggies™ - <i>Nature's Way</i>
Garlicin® HC - <i>Nature's Way</i>
Gotu Kola - <i>NOW</i>
Grape Seed Antioxidant - <i>NOW</i>
Gymnema Sylvestre - <i>NOW</i>
Hair & Skin - <i>Nature's Way</i>
HAS® Original Formula - <i>Nature's Way</i>
Herbal Eyebright - <i>Nature's Way</i>
Hoodia Trim - <i>Flora</i>
Horny Goat Weed - <i>NOW</i>
Hyaluronic Acid - <i>NOW</i>
Hyaluronic Acid with Msm - <i>NOW</i>
Hyaluronic W/MSM - <i>NOW</i>
Hyssop - <i>Nature's Way</i>
Immune Strong Wellness Booster™ - <i>Nature's Way</i>
Immunerenerg.Mushroom - <i>NOW</i>
Inositol Hexaphosphate - <i>NOW</i>
Ipriflavone - <i>NOW</i>
Joint Support Powder - <i>NOW</i>
KB Kidney-Bladder - <i>Nature's Way</i>
L-Carnosine - <i>NOW</i>
L-Glutathione - <i>NOW</i>
Lgf-1 Lozenges - <i>NOW</i>
Liquid Multi Berry/Xylitol Sweet - <i>NOW</i>
Maga Potency Natural Resveratrol - <i>NOW</i>
Maxion Nutrition – Max NGH Release - <i>Flora</i>
Mega Hoodia - <i>Flora</i>
Migranon original formula - <i>Flora</i>
MygraFew™ - <i>Nature's Way</i>
Nattokinase - <i>NOW</i>

## *Reasons for Loss of Products...*

Natural Resveratrol - <i>NOW</i>
NatureWorks Herbal Iron liquid - <i>Nature's Way</i>
NatureWorks Herbal Iron liquid - <i>Nature's Way</i>
NatureWorks Swedish Bitters Liquid - <i>Nature's Way</i>
Oat Beta Glucans - <i>Flora</i>
Olbas Oil / Salve - <i>Flora</i>
Oral Ivy Liquid - <i>Nature's Way</i>
Orchard Fruits™ - <i>Nature's Way</i>
Peppermint, Enteric Coated- <i>NOW</i>
Phase 2 Starch Neutralizer - <i>NOW</i>
Pomegranate - <i>Nature's Way</i>
Pomegranate Plus - <i>Flora</i>
Pre-Natal Caps - <i>NOW</i>
Propolis - <i>NOW</i>
Pycnogenol W/Bioflavonoids - <i>NOW</i>
Red Clover Combo - <i>Nature's Way</i>
Resveratrol 4xnatural - <i>NOW</i>
Salus Tonics – Salusan Herbal Nerve Tonic, Honey with Fennel Cough Syrup - <i>Flora</i>
Sambu – Elderberry Mini Cleanse 3 Day / Deep Cleanse 10 Day Program - <i>Flora</i>
Saventaro® (Cat's Claw) - <i>Nature's Way</i>
Schizandra Fruit - <i>Nature's Way</i>
SciaticAide™ - <i>Nature's Way</i>
SmokeFree™ - <i>Nature's Way</i>
Sports Gel™ - <i>Nature's Way</i>
Super Cortisol Support - <i>NOW</i>
T-Plex - <i>Nature's Way</i>
TenseDefense - <i>Flora</i>
Thisilyn® Daily Cleanse - <i>Nature's Way</i>
Tru Hoodia Complex - <i>NOW</i>
True Organics Cherry - <i>Nature's Way</i>
True Organics Cranberry - <i>Nature's Way</i>
True Organics Iron - <i>Nature's Way</i>
True Organics Vitamin B-12 - <i>Nature's Way</i>
True Organics Vitamin C - <i>Nature's Way</i>
Ulcetrol W/Pepzin Gi&Mastic Gum - <i>NOW</i>
Umcka® Cherry Syrup - <i>Nature's Way</i>
Umcka® Chewables – Mint - <i>Nature's Way</i>
Umcka® FastActive Cherry ColdCare 6 unit counter display - <i>Nature's Way</i>
Umcka® FastActive Mint-Menthol ColdCare 6 unit counter display - <i>Nature's Way</i>
Umcka® Hot Drink – Lemon - <i>Nature's Way</i>
Umcka® Menthol Syrup - <i>Nature's Way</i>
Valerian Nighttime™ - <i>Nature's Way</i>
Vit-Min 100 High Potency - <i>NOW</i>
Vitamin D3 - <i>Nature's Way</i>

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Wheat Germ Oil 20 Minum Sgel - <i>NOW</i>
Whole Body Digestive Renewal <sup>TM</sup> Kit - <i>Nature's Way</i>
Yucca-AR Formula - <i>Nature's Way</i>
Zinc Picolinate - <i>NOW</i>