

February 18, 2025

The Honourable Josie Osborne
Minister of Health

Delivered via email

Dear Minister Osborne,

On behalf of the British Columbia Naturopathic Doctors (BCND), we are writing to share our perspectives and concerns regarding the Health Professions and Occupations Act (HPOA). While BCND supports in principle reforms that aim to enhance patient safety and care, including enhanced cultural safety and humility provisions, we believe there are aspects of the HPOA that warrant further consultation and refinement to ensure they do not inadvertently hinder healthcare delivery.

We request an opportunity to discuss our concerns directly with you. Below, are key areas where we seek further dialogue to safeguard both the public interest and the ability of naturopathic doctors to continue delivering accessible, high-quality care.

Key Concerns with the HPOA

- 1. Lack of Adequate Consultation:** The urgency of the HPOA's rollout has limited meaningful engagement with key stakeholders, including naturopathic doctors. To address this, we are seeking a collaborative process to ensure the Act is implemented effectively, with sufficient input from those directly impacted.
- 2. Summary Protection Orders:** The introduction of summary protection orders, which allow regulatory bodies to restrict or suspend a practitioner's ability to practice without notice, poses a significant risk to both patient care and the livelihoods of healthcare providers. Without appropriate safeguards, this provision could lead to abrupt and unjustified disruptions in care, undermining public trust and leaving patients without access to essential services. We urge the government to establish clear procedural protections to ensure fairness and prevent unintended harm to both practitioners and the communities they serve.
- 3. Minister-Appointed Boards:** We appreciate the need for governance reform, but minister-appointed regulatory boards could limit the inclusion of practitioner expertise, which is essential for informed decision-making and balanced oversight. We urge the government to adopt an approach that integrates practitioner voices to ensure regulatory decisions reflect practical, on-the-ground realities.
- 4. Privacy and Appeals Process:** The changes to the complaints and appeals process limit the options available to registrants and pose privacy concerns, especially when handling sensitive personal information. We believe that further review of this process is necessary to balance accountability with practitioners' rights.
- 5. Cost Implications:** The centralization of regulatory functions under the HPOA may result in higher administrative and compliance costs for healthcare professionals, disproportionately affecting smaller professional groups like naturopathic doctors. These increased financial pressures could threaten the viability of smaller practices, particularly in rural and underserved communities where NDs often serve as primary healthcare providers. To safeguard access to care in these areas, we urge the government to implement cost-mitigation measures, such as fee caps or transitional funding, to prevent unintended barriers to practice and ensure the continued delivery of essential healthcare services.

We respectfully request further consultation to address these concerns before key provisions of the HPOA are fully implemented.

Specifically, we are seeking:

- A pause and review period to allow for meaningful consultation with NDs and other health professionals.
- Assurance that professional voices are adequately represented on regulatory boards and in discussions related to policy impacts.
- A collaborative effort to refine provisions related to governance, complaints, appeals, and cost implications.

We believe the HPOA presents a real opportunity for positive change if it is implemented in a balanced and collaborative manner. To accomplish that will require thorough consideration of its impacts on healthcare delivery, practitioners, and the public. BCND remains committed to working constructively with the government to achieve these goals.

Thank you for considering our concerns and recommendations. We welcome the opportunity to meet and discuss these matters further at your earliest convenience.

Sincerely,

A handwritten signature in black ink, appearing to read 'V. Lindsay'.

Dr. Vanessa Lindsay, ND
Board President

Cc: [Tiffany Mah](#), Associate Deputy Minister