

**October 6, 2025**

Honourable Josie Osborne  
Minister of Health  
Province of British Columbia

*Delivered via email*

Dear Minister Osborne,

British Columbia Naturopathic Doctors (BCND) would welcome the opportunity to meet with you to discuss how to ensure that regulatory modernization strengthens, rather than destabilizes, the professions that British Columbians rely on for care. We are writing to bring forward a concern that has serious implications for health system stability and the success of the government's Health Human Resources Strategy.

On September 23, the College of Complementary Health Professionals of BC announced a twenty five percent increase to naturopathic doctor registration fees in year one and a fifty percent increase over two years. Under the legacy College of Naturopathic Physicians of BC, the annual renewal fee was \$1,810 in 2018. When the amalgamated college was created, that rose to \$2,090, an increase of about 15.5 percent. The new proposal would raise the fee to \$2,645 in the first stage, a 26.6 percent increase over current rates, and to \$3,200 in the second stage, a 53.1 percent increase. Compared to the 2018 legacy level, this represents an increase of more than 75 percent. These numbers are far beyond the pace of past adjustments and run directly counter to the assurances that amalgamation would deliver efficiencies and help contain costs. The College has also stated that the revised schedule is not formally in effect until the bylaw amendment is filed with the Ministry of Health. While such approval has historically been treated as procedural, the requirement means there is still scope for government to question or object to what has been proposed.

Naturopathic doctors collectively see thousands of patients across British Columbia every year. They provide primary care, manage complex cases, order and interpret laboratory and imaging tests, prescribe medications, and coordinate care for patients who often have nowhere else to go. One in three households in BC choose to see an ND. When costs rise so sharply that some practitioners question whether they can stay in practice, it is patients who suffer first. Communities lose capacity, families lose affordable options, and those who already face barriers to access are pushed further out of the system.

The College has linked these fee increases to requirements under the Health Professions and Occupations Act (HPOA) and to the establishment of the Office of the Superintendent of Health Professions and Occupations. While we support the stated intent of the HPOA to modernize regulation, the implementation to date has not inspired confidence. Consultation periods have been unreasonably short, communication inconsistent, and no cost modelling has been provided to those expected to pay for these changes. Rather than building stability, the process has created uncertainty and mistrust. The efficiencies promised through amalgamation have not been realized, and providers are left to absorb escalating costs in a system that is already fragile.

For many practitioners, the HPOA has come to represent constraint rather than modernization. Without clear leadership from government, it is sending the message that the future for providers in this province is anything but positive. Instead of optimism and collaboration, what is being felt is further destabilization of a workforce that needs to be supported and encouraged to stay. The money matters, but the deeper reality is that these decisions weaken the entire health system by eroding trust and pushing providers out at a time when we need everyone "in."

Respectfully, there is still an opportunity to change course. With your leadership, HPOA implementation can be slowed and managed in a way that restores transparency, creates space for genuine engagement, and ensures costs are justified and communicated early. Regulatory modernization can and must be an opportunity to strengthen the system, protect patients, and build collaboration among the full range of providers. If handled properly, it can move the system toward full participation and support from practitioners. If handled poorly, it risks accelerating collapse and making access even harder for patients.

We urge you not to miss this chance to fix what is broken. Clear direction from your office can ensure that regulatory change supports your government's mandate to strengthen health care, stabilize the workforce, and reduce costs for families. BCND would welcome the opportunity to meet with you to discuss how we can work together to realize this vision.

Sincerely,



Dr. Vanessa Lindsay  
President



Alix Arndt  
CEO

cc: Cynthia Johansen, Deputy Minister