

November 12, 2025

Dr. Anna Kindy
MLA for North Island and the Official Opposition Critic for Health
Delivered via email

Dear Dr. Kindy,

We are writing to share a development that underscores many of the concerns you have raised about the Health Professions and Occupations Act. On September 23, the College of Complementary Health Professionals of BC announced a staggering increase to naturopathic doctor registration fees, enacted without notice or advance conversation and without any clear explanation of the cost drivers.

The College has linked these increases to the *Health Professions and Occupations Act* and the establishment of the Superintendent's office. However, the magnitude of these increases cannot be justified. Under the legacy College of Naturopathic Physicians of BC, the annual renewal fee in 2018 was \$1,810. That rose to \$2,090 with amalgamation, an increase of roughly 15.5 percent that was publicly described as a one-time adjustment to achieve efficiencies and cost savings. The new proposal would raise fees to \$2,645 in the first stage, a 26.6 percent increase, and to \$3,200 in the second stage, a 53 percent increase. Compared to the 2018 level, this represents an increase of more than 75 percent.

These numbers are not just about fees. They point to a deeper problem in how the *HPOA* is being implemented: as a process that is driving costs up, pushing professionals out, and creating instability in a system already in crisis. Naturopathic doctors provide essential access to care in communities across BC. They deliver primary care, manage chronic and complex conditions, prescribe medications, order and interpret laboratory and imaging tests, and coordinate care for patients who often have no other option. When financial pressures make it harder for NDs to stay in practice, it directly affects access for thousands of patients who rely on them as their first or only point of care.

Amalgamation was presented as a cost-saving measure that would reduce duplication and streamline operations. Instead, we are seeing significant and steady fee increases at a time when health professionals were told to expect efficiencies. This is creating financial pressure on registrants and raising legitimate questions about where oversight has failed.

While BCND supports the principle of modernizing regulation, the implementation to date has been characterized by poor communication, very short consultation windows on bylaws, and no transparency about costs. This has caused significant anxiety across the profession at a time when naturopathic doctors are already under pressure and serving as an essential source of primary care for thousands of British Columbians.

This situation is not only fiscally irresponsible but dangerous for workforce stability. It risks accelerating the loss of health care providers from the province precisely when British Columbia is struggling to retain them. Every ND who leaves practice represents hundreds of patients who lose access to timely, relationship-based care. The government's own Health Human Resources Strategy cannot succeed while new regulatory frameworks are making it harder, not easier, for qualified professionals to stay. Your recent comments about the need to introduce options within our universal healthcare system reflect a vision we share. A modern health system should welcome innovation and flexibility, not erect new barriers for qualified professionals who expand access to care. Ensuring that British Columbians have more, not fewer, options is essential to meeting today's health-care challenges, and the current approach to *HPOA* implementation is moving in the opposite direction.

This underscores the need for scrutiny and accountability. The public was assured that amalgamation and the new *HPOA* framework would improve efficiency and stability, yet the reality has been the opposite. Health professionals are paying more for less voice and less clarity, while government has not demonstrated fiscal or operational oversight of this process.

For many in our profession, this experience confirms fears that the *HPOA* will centralize decision-making, increase costs, and reduce the ability of professions to have a meaningful voice in their regulation. The result is instability, eroded confidence, and growing concern that more practitioners may leave practice, at the very moment government is ostensibly working to recruit and retain health professionals under the Health Human Resources Strategy.

BCND has raised this issue directly with the Minister of Health, the Deputy Minister, the Allied Health Policy Secretariat, the Superintendent (Designate), and Professional Regulation. To date we have only received a response from the Superintendent (Designate), whose position does not take full authority until the HPOA is in force. We are asking you to raise this urgently in the Legislature. The most significant regulatory reform in decades is being implemented in a way that is creating fear, confusion, and financial pressure for health professionals. We collaborate regularly with other health professional associations, and while we do not speak for them, we know there is widespread concern that *HPOA* is being rolled out in a way that undermines the stability of the entire health workforce.

The opposition has a vital role to play in ensuring accountability and protecting the health-care workforce. This is not only a question of fees, but of access, retention, and the future sustainability of care for British Columbians. Government must be pressed to explain how this approach can possibly be considered fiscally responsible or beneficial to the health system, how it helps rather than harms recruitment and retention, and why it continues to ignore the urgent concerns being raised by health professionals across the province. These concerns have been voiced repeatedly and clearly, yet implementation continues to move forward at full pace, with no meaningful engagement, no transparency, and no effort to mitigate the harm it is causing.

Sincerely,

A handwritten signature in black ink, appearing to read "V. Lindsay", with a stylized flourish at the end.

Dr. Vanessa Lindsay
President