



## THE EXAMINING BOARD OF NATURAL MEDICINE PRACTITIONERS

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### BRANCHES:

EBNMP Canada  
EBNMP USA

### MISSION STATEMENT:

Recognition,  
Registration &  
Accreditation in  
Natural Medicine

### ACCREDITATIONS & AFFILIATIONS:

American  
Naturopathic  
Medical Association

Ontario DNM Assoc.

Alberta DNM Assoc.

Maritimes DNM Assoc.

### ADVISORS:

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Dr. M. Cormier  
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Standing Committee on Social Policy  
Attn. Trevor Day, Committee Clerk  
99 Wellesley Street West, Room 1405,  
Whitney Block Queen's Park,  
Toronto ON M7A 1A2

### BILL 171 – Position Statement

Dear Ms. Sullivan,

The *Ontario Doctors of Natural Medicine Association (ODNMA)* - the provincial association for DNMs in Ontario, and representatives of the *Examining Board of Natural Medicine Practitioners Canada* would like to voice its opinion with regards to several BILL 171 issues that need clarification or amendments prior to formal passing of the bill.

The *EBNMP Canada* has registered in excess of 500 DNMs (Doctorate of Natural Medicine™) in Canada and with the majority residing in Ontario. These highly trained professional practitioners have to document a minimum of 4400 total hours of qualified training in natural medicine modalities for *EBNMP* registration as a DNM.

Many of these applicants double-register under the *EBNMP* designation of Registered Acupuncture Practitioner or Registered Homeopathic Practitioner or Registered Manual Practitioner based on documenting a minimum of 2500 hours of formal training in homeopathy manual medicine and acupuncture.

In addition, the *EBNMP* requires 40 hours in Annual Continuous Education Credits for all its renewals, substantially more than most other professional boards or colleges require.

The Examining Board of Natural Medicine Practitioners registers the Foreign Trained Medical Professionals such as MD's, DO's, Chinese Medicine Doctors as well as Homeopathic Doctors and thus provides Medical Practitioners to service the Natural Medicine Industry across Canada.

Congruent with our registrant demographics, training has been acquired in a number of countries China, USA, Canada, Europe, Russia, Sri Lanka, India, etc. but at all times must satisfy the above mentioned minimum standard set by this Board.

The *EBNMP* is a national non-profit organization affiliated with the *American Naturopathic Medical Association* and *OIUCM USA (Alma Ata 1962)*.

DNMs are orthodox practitioners who make use of only natural healing modalities and based on the large number of members who play an active role in the Natural Health Care Field the Ontario Doctor's of Natural Medicine Association (representative of DNMs in Ontario) declares a major stake in the regulation process of Natural Medicine Practice and its modalities.

In the interest of our members we are in principle in agreement with regulation of Naturopathic Medicine and Homeopathy because they are two elements within the broad scope of Natural Medicine.

*Dr. June Ann Kelly – President*

*Dr. Allan Oolo Austin – Chairman*

We support a professional Natural Medicine College and its ability to establish minimum educational standards for the regulation process and oversee a reasonable transition period.

Regarding the concern about a possible confusion of the title "Doctor" or Doctor of Naturopathic Medicine title the *ODNMA and the EBNMP* are concerned about the wording employed in several clauses of BILL 171; wording that might be interpreted to the extent that only Naturopaths would be considered for the doctor title and have the exclusivity in regards to a specialty of Naturopathy which is only one element of Natural Medicine.

A health practitioner in Canada holding a Doctorate in Natural Medicine with the designation DNM® has an equivalent scope of practice to that of a Naturopathic Doctor holding the designation of N.D. This is analogous to the equivalency status of an N.M.D. to that of an N.D. in the United States. As such and in order to not be discriminatory, we are formally requesting inclusion in Bill 171 for all DNM® in Ontario with equivalency status to Naturopaths under the guidelines of the Bill.

Should there be any discrepancy in level of education or training; one needs only to consider how many N.D.s in Ontario who trained in Naturopathy before the 1990s. There is considerable discrepancy in level of training depending on the year one studied. Some Naturopaths holding the designation of N.D. had only between 6 weeks to 2 years of training. The current Naturopathic College in Toronto is relatively new having only been in existence for about 15 years. (In 1992 there were only 8 students registered for one class).

THESE CLAUSES NEED IMMEDIATE CLARIFICATION.

It is further our opinion that in view of the great diversity and the difficulties to be expected in reaching a consensus between the different stakeholders concrete Grandfathering Rules be established PRIOR to any further readings and passing of BILL 171.

- 1) It is our belief that it will not be possible for a newly established College to withdraw the right to practice Natural Medicine modalities and of the substances used by practicing members of any of the established Ontario health professional associations, be they DNM, DC or DO.
- 2) We request the Minister of Health to prevent the Naturopathic – Homeopathic Professionals from claiming exclusivity in these areas.
- 3) The Ontario Doctors of Natural Medicine Association (ODNMA), under the guidelines of the EBNMP Canada, establish regular consultations with the Minister of Health with these and other matters that have a direct bearing on the practice of Natural Medicine in this Province.

Should guidelines be required for any N.D.s or DNM® for standardization, we would suggest they be presented to both groups for timeline compliance. The EBNMP will ensure all DNM® meet all educational guidelines set by the Ontario Ministry of Health.

Thank you for the opportunity to voice our concerns. Please keep us informed about any further steps with regards to BILL 171 at the following addresses:

Yours truly,

Dr. June Ann Kelly  
President  
EBNMP Canada

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Fax: 416-724-2332 Phone: 416-335-7661

*Dr. June Ann Kelly – President*

*Dr. Allan Oolo Austin – Chairman*