

THE FUTURE OF COMMON COMFREY

Traditional herbalists are worried



On December 12th, 2003, Health Canada announced that Canadian manufacturers must pull all comfrey-containing products (for external or internal use) from the market. Canadian herbalists are actively opposing this unjustified action that will prevent consumers from using products that are effective and safe.

We ask the Natural Health Products Directorate and Health Canada to modify this regulatory action in a way that will protect Canadian consumers without depriving them of effective and harmless products.

We understand Health Canada's concerns and its duty to make consumers and manufacturers aware of the dangers of pyrrolizidic alkaloids in certain species of comfrey. However, we see no evidence of toxicity for the external use of comfrey in the documents presented by Health Canada.

After examining the proof provided by Health Canada to justify this rash decision, we see no reason to classify comfrey as a toxic product when used externally, no matter the species. Canadian herbalists, now preparing their documents of evidence to support their request for natural health product licences (NHN), would never form such an erroneous conclusion based on the findings. We ask Health Canada to grant us the same courtesy.

We are also asking Health Canada to give natural health product manufacturers the same chance as companies whose products have drug identification numbers (DIN). Those companies have a grace period to prove that their products are labeled correctly (external use only) and do not contain any other species of comfrey than *Symphytum officinale*. Since Health Canada's excessive decision arrives at the same time as a moratorium and a 2 to 4 year transition period designed to give manufacturers of natural health products without a DIN time to comply with this new regulation; it greatly undermines the trust herbalists and consumers have in the way the regulation will be implemented. We ask the Natural Health Product Directorate to continue the work it has undertaken and defend the rights of those who use natural health products.

We believe that in this context, it is unacceptable for Canadian consumers to lose access to effective and safe comfrey-containing products. We are asking the Natural Health Products Directorate to intervene on our behalf with Health Canada's Marketed Health Products Directorate in order to respect consumer choice and to allow natural health products containing *Symphytum officinale* for external use to remain on the market.

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