

Steve Chapman

From: Steve Chapman [steve@isomerdesign.com]
Sent: 30-May-11 4:34 PM
To: 'OCS.Policy.and.Regulatory.Affairs@hc-sc.gc.ca'
Subject: attn: Stephanie Chandler re: Salvia Divinorum

Hello Ms Chandler,

The page: <http://www.hc-sc.gc.ca/hl-vs/iyh-vsv/life-vie/salvia-eng.php#th> asserts the following:

“As *S. divinorum* is a plant with hallucinogenic properties when consumed by humans, it currently meets the definition of a natural health product (NHP) under the *Natural Health Products Regulations*.”

The definition of an NHP in the *Natural Health Products Regulations* is:

"natural health product" means a substance set out in Schedule 1 or a combination of substances in which all the medicinal ingredients are substances set out in Schedule 1, a homeopathic medicine or a traditional medicine, that is manufactured, sold or represented for use in

- (a) the diagnosis, treatment, mitigation or prevention of a disease, disorder or abnormal physical state or its symptoms in humans;
- (b) restoring or correcting organic functions in humans; or
- (c) modifying organic functions in humans, such as modifying those functions in a manner that maintains or promotes health.

I can find nothing in the NHP definition to support the earlier assertion, which I believe is a false and misleading statement. I would be obliged if you could explain the reasoning behind said assertion.

Regards,

Steve Chapman