

From: [Kathees Anandavel](#) on behalf of [nhpd_dpsn_info](#)
To: steve@isomerdesign.com
Subject: Re: Salvia Divinorum It's Your Health wording re NHPs
Date: July-12-11 7:55:13 AM

Dear Mr. Chapman,

When *S. divinorum* is manufactured, sold or represented for use in modifying organic functions in humans, and hallucinogens work by modifying organic functions in the brain, it meets the definition of a Natural Health Product (NHP) in accordance with the *Natural Health Products Regulations* and the definition of a drug under the *Food and Drugs Act*. It is illegal to sell NHPs in Canada unless they have market authorization, and no *S. divinorum* product has been licensed by Health Canada. All unauthorized drugs and NHPs are subject to compliance and enforcement actions by the Health Products and Food Branch Inspectorate.

Health Canada has notified the public of our intent to add *Salvia divinorum* and its active principle, Salvinorin A, to Schedule III to the *Controlled Drugs and Substances Act*, in a Notice to Interested Parties published in Canada Gazette Part I, vol. 145, No. 8, pages 438-439, on February 19, 2011 (attached). Health Canada feels strongly that these substances would be more appropriately regulated under the *Controlled Drugs and Substances Act* rather than the *Food and Drugs Act* and the *Natural Health Products Regulations*.

Natural Health Products Directorate
Direction des produits de santé naturels
Tower/Tour A, Qualicum, AL 3301
2936 rue Baseline Road
Ottawa, Ontario K1A 0K9
Fax: (613) 948-6810