

## Message from CNPBC – Advertising of Compounded Products

Dear Registrants:

It has come to the College's attention that some registrants have been advertising compounded substances, specifically compounded IV treatments, to the general public:

- a. in 'menu-like' formats;
- b. for the treatment of common ailments such as low energy, low mood, weight control, and the aftereffects of drugs or alcohol; and/or
- c. with claims regarding the efficacy of substances, such as vitamins, as treatments for ailments not listed in the monographs for those substances.

Such advertising likely violates sections 9 and 3 of the [Food and Drugs Act](#) and Health Canada's [Policy on Manufacturing and Compounding Drug Products in Canada](#).

The College would like to remind all registrants of the following sections of the [Food and Drugs Act](#):

*9 (1) No person shall label, package, treat, process, sell or advertise any drug in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character, value, quantity, composition, merit or safety.*

*3 (1) No person shall advertise any food, drug, cosmetic or device to the general public as a treatment, preventative or cure for any of the diseases, disorders or abnormal physical states referred to [Schedule A.1](#).*

### Compounding and Advertising

It is Health Canada's position that a compounded product or compounding service may not be advertised to the general public. ([Appendix I General Guideline on Compounding and Manufacturing Activities](#))

In order to provide a compounded product, registrants must ensure that:

- a valid patient-healthcare professional relationship exists;
- a compounded product is compounded for an individual person;
- there is a therapeutic need for the product or lack of product availability; and
- compounding takes place only in the case of **therapeutic need** or lack of product availability, and not solely for the economic benefit of the healthcare professional.

(5.1 of Health Canada's [Policy on Manufacturing and Compounding Drug Products in Canada](#).)

### Advertising Vitamin IVs and Injectable Vitamins

Some vitamin mineral preparations are considered a Natural Health Product (NHP) under the [Natural Health Products Regulations](#) (NHPR). However, when administered by injection or IV, these products are excluded from the NHPR and subject to the Food and Drug

Regulations. The following are examples, from [Schedule A.1](#), of conditions that a health product (drug or NHP) may not be advertised to treat:

- Acute alcoholism
- Acute anxiety state
- Acute infectious respiratory syndromes
- Acute psychotic conditions
- Addiction (except nicotine addiction)
- Asthma
- Cancer
- Dementia
- Depression
- Obesity
- Thyroid disease

The full list may be found in [Schedule A.1](#) of the *Food and Drugs Act*. In order to advertise a health product as preventative for the conditions listed in [Schedule A.1](#), a product must have market authorization (i.e. a Drug Identification Number or Natural Product Number) issued by Health Canada. Compounded products do not have market authorization and cannot be advertised.

#### **Examples of Contraventions**

- Offering a “menu” of products that suggest members of the public may order a pre-formulated product such as a vitamin IV drip or injectable vitamin.
- Advertising IV drips or vitamin injections to treat specific conditions such as anxiety, stress, respiratory or lung infections, or mood disorders.
- Advertising products such as vitamins for misleading and/or off-label purposes, such as improving beauty, confidence, immunity, or energy.

As a naturopathic doctor in British Columbia, you are expected to comply with federal, provincial, territorial, and municipal laws, rules and regulations. A failure to do so may be considered professional misconduct pursuant to section 3(l) of the [Code of Conduct](#).

We thank you for your attention to this matter. Should you have questions or concerns, kindly direct them to [kscott@cnpsc.bc.ca](mailto:kscott@cnpsc.bc.ca) or call the College at 604.688.8236.

Regards,

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Registrar & CEO