



Health  
Canada

Health Products  
and Food Branch

Santé  
Canada

Direction générale des produits  
de santé et des aliments

Marketed Health Products Directorate  
Address Locator #0701D  
OTTAWA, Ontario  
K1A 0K9

9608-6-8  
15-107867-155,  
15-107872-877,  
15-107874-907,  
15-107894-618,  
15-107895-908,  
15-107898-551,  
15-107899-818,  
15-107901-391,  
15-107902-442,  
15-107975-183

October 13, 2015

Michael Kruse  
Bad Science Watch  
180 Danforth Ave. P.O. Box 35024  
TORONTO, Ontario  
M4K 3P5  
[mkruse@badsciencewatch.ca](mailto:mkruse@badsciencewatch.ca)

Dear Mr. Kruse,

**Re: Review of Canadian Sellers of Homeopathic Flu “Vaccines” (Nosodes)**

This is in response to your correspondence of April 8, 2015, in which you expressed concern regarding the online advertising of homeopathic preparations by a number of Canadian vendors, as outlined in your document entitled “Homeopathic vaccine listing”. Specifically, you allege that although these products are being advertised and sold as a preventative or cure for influenza, there is no evidence to support their effectiveness, making the marketing of these products a danger to the health of Canadians. We apologize for the delay in responding.

Health Canada has assessed the Web sites in question and has determined that much of the advertising contains product information that exceeds the Terms of Market Authorization (TMA). Health Canada uses the term "TMA" to refer to the elements of product licences (PL), including claims, and it is our position that natural health products can only be advertised in accordance with the applicable PL. Because specific evidence has not been reviewed and considered by us to

support many of the claims being made, they cannot be included in the advertising material, as this would be a contravention of Section 9(1) of the *Food and Drugs Act* (F&DA) with respect to the regulatory status or TMA of the product. It is thus our position that the advertising contravenes Section 9(1) of the F&DA, which prohibits advertising that is false, misleading or deceptive, or is likely to create an erroneous impression regarding its character, value, merit or safety.

Please be assured that Health Canada is undertaking steps to resolve this issue. We thank you for your interest in ensuring that advertisements of health products meet Canada's regulatory requirements.

Regards,

A handwritten signature in blue ink, appearing to be 'Alain Musende', written in a cursive style.

Alain Musende, PhD  
Manager, Regulatory Advertising Section  
Therapeutic Effectiveness and Policy Bureau  
Marketed Health Products Directorate  
Tel: (613) 954-6780, Fax: (613) 948-7996