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Application ID: 57371

Submitted values are:

Bill or item of business: **Bill 88, Working for Workers Act, 2022**

Choose a topic

Do you know the bill title or business (e.g., pre-budget consultations) you'd like to speak or submit material about?
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I am submitting material as an individual

Full name
Richard Henderson

Paste submission
I'm writing as an Ontario resident and a patient of a Registered Acupuncturist / Registered Traditional Chinese Medicine Practitioner, to express my concern about the Traditional Chinese Medicine Repeal Act, 2022 of Bill 88, Working for Workers Act, 2022, Schedule 5.

Schedule 5 would undo the regulation of Traditional Chinese Medicine (TCM) as a health profession in Ontario, and dissolve the College of Traditional Chinese Medicine Practitioners and Acupuncturists of Ontario (CTCMPAO).

I find the proposed legislation very concerning for the following reasons:

1. Without regulation, it would be difficult to tell properly- from improperly-trained Acupuncturists and TCM Practitioners. CTCMPAO members now have to meet the highest standards for acupuncture education and training in Ontario (e.g. more acupuncture-specific hours of training than other health professions). TCM Practitioners are also trained to recognize herb-drug interactions and other herb safety issues. De-regulation would leave me, as a patient, vulnerable and more at risk of unsafe practices.

2. Without regulation, there is no official oversight of the profession, and no avenue for complaint in the case of malpractice or unprofessional conduct by a practitioner. Current investigations and complaints would cease, which is irresponsible with regard to public safety.

3. Regulation could be improved instead of abolished. The Ministry of Labour says this is about increasing access for TCM practitioners, many of whom are immigrants, and may face language barriers and other issues. These are important issues of discrimination that can be solved through implementation of multilingual competency exams (such as those in place in British Columbia), more affordable licensing fees, and eliminating other barriers for foreign-trained workers in the field.

4. Without regulation, TCM would be less recognized as an effective and proven health care modality, and an important contributor to Ontarians' physical and mental health. As such:

i. Insurance companies may stop coverage for Acupuncturist services, which many patients like myself use to access this incredibly helpful, safe, and cost-effective health care modality.

ii. Providing TCM services may become less viable as a livelihood, impacting over 2000 practitioners and their support staff's jobs and families. TCM Practitioners are already among the lower-paid regulated health practitioners.

Especially during COVID, we need more effective, affordable and safe options, not less, to help Ontarians take care of our health, without relying on overcrowded hospitals and urgent care clinics. TCM is a vital part of the public health care system and should be treated like other regulated health professions. Surely there must be other alternatives to open more access to the practice of TCM rather than through the draconian measures of Schedule 5.

I hope you will consider removing Schedule 5 from Bill 88, and upholding the regulation of Traditional Chinese Medicine in Ontario. Thank you for your attention to this matter.