

Social Policy Committee,

In spite of what the *Traditional Chinese Medicine Repeal Act, 2022 of Bill 88, Working for Workers Act, 2022*, Schedule 5, assumes, the de-regulation of Traditional Chinese Medicine (TCM) and acupuncture is not in the best interest of the general public. The dissolution of the CTCMPAO is a serious public health risk as it allows untrained individuals to perform the controlled acts of performing acupuncture below the dermis and mucous membranes, and communicating a TCM diagnosis.

In unskilled hands, acupuncture can cause life-threatening injuries like pneumothorax and even death. We respectfully ask for your reconsideration for the following reasons:

1. The *Traditional Chinese Medicine Repeal Act, 2022 of Bill 88, Working for Workers Act, 2022*, Schedule 5 (hereinafter "Schedule 5"), will remove the safeguards, standards of practice, and professional competencies required by CTCMPAO members. These are put into place to ensure the safety of the public; the very users of Traditional Chinese Medicine and acupuncture.
2. The CTCMPAO also sets jurisprudence and ethical standards of practice to protect the public. Schedule 5 dictates that all current investigations and proceedings into misconduct shall be dropped. The dissolution of the CTCMPAO would allow these individuals with active complaints and those who have decisions against them to continue to practice. This removes public protection and poses another threat to public health, both on the physical and mental levels.
3. The practice of Traditional Chinese Medicine and acupuncture is a regulated health profession. As such, our profession is under the authority of the Ontario Ministry of Health and not the Ontario Ministry of Labour, Training and Skills Development, whose expertise is not in the field of health care regulation.
4. Schedule 5 is discriminatory toward predominantly Asian health practitioners, as only the Traditional Chinese Medicine and the acupuncture profession was singled out, despite there being twenty-six health professions regulated under the RHPA.
5. Schedule 5 will have a direct negative impact on the public's ability to access Traditional Chinese Medicine and acupuncture as part of their health care.
6. Schedule 5 will give insurance companies the opportunity to deny the coverage of acupuncture when it is performed by TCM-trained acupuncturists. Instead insurance companies might favour non-TCM trained regulated health practitioners, who generally have less training and scope in the practice of acupuncture.
7. Schedule 5 will negatively impact the 2,760 registered members of the CTCMPAO, our families, jobs, and businesses and subsequently the businesses we frequent.
8. Schedule 5 will have a negative impact on the fifteen TCM and acupuncture educational institutions, thirteen of which are private colleges and two of which are community colleges, and their staff, teaching faculty, program directors, and owners.
9. Schedule 5 will have a negative impact on the hundreds of students enrolled in programs and new graduates across the province.
10. Schedule 5 will negatively impact on the required competency standards for the practice of TCM, the professional standing of TCM and hence the public's access to safe, competent and professional health care services.

We are aware that those who lobbied for the de-regulation of TCM and acupuncture had valid issues with the English language requirements set out by the CTCMPAO. Rather than dissolve the CTCMPAO, which will be a lengthy and arduous process that negatively impacts thousands of your constituents, we respectfully bring forth the recommendation that the province of Ontario follow in British Columbia's footsteps and allow for both the Chinese and English languages in practice.

We implore you to make the right decision.

Sincerely,

Melissa Robertson
Student of TCM and Acupuncture