



## Environmental Sensitivities Coalition of Canada

March 23, 2021

Christine Elliot  
Minister of Health  
777 Bay St.  
Toronto, ON M7A 2J3

For your consideration,

I am the chair of the Environmental Sensitivities Coalition of Canada, a group currently representing sixty-one members across Canada with ES illnesses, including: multiple-chemical sensitivity, electromagnetic frequency sensitivity, allergies, autism, ADHD, respiratory illnesses, migraines, myalgic encephalitis, chronic fatigue syndrome, and more. Please see the attached document for a full list of related ES medical designations.

With regards to the upcoming review and standardization of alternative medicine practices planned in Ontario, we require that the following issues with current Western medicine processes—and issues with the existing studies on the efficacy of these treatments—be considered.

The issues with provincially-regulated medicine which require patients to seek alternative medicine and treatments include:

- Poor knowledge management on conditions such as: MCS, EMF, MCAS, and food sensitivities outside of the allergy field. This leads to patients being ignored by doctors and specialists, which forces them to seek naturopaths, who are better informed on genetic links and supplement-based diet changes and over-the-counter treatments.
- Doctors within accepted health structures not providing evidence-based testing if it is not covered under their provincial plan. This includes, but is not limited to: quick genetic tests, hormone urinalysis, full bacterial spectrum stool sample testing, and various blood tests that alternative practitioners can get at full cost.
- A shortage of general practitioners in many communities, leaving people without other medical options. Since GPs are able to choose their patients, there are many applicants with complex or misunderstood illnesses who are simply not contacted after applying, and therefore left without medical care. Similarly, a lack of specialists outside of the major cities creates a barrier, due to the lack of travel funding, chemical-free transit, and accessible hotels.

It is our stance that all of the medically-approved treatments and tests should be offered by general practitioners, and covered under provincial health plans. These omissions

create situations in which patients are put in harm's way, should they turn to alternative practitioners who are simply commercial ventures, and using potentially-dangerous methods. Meanwhile, the practitioners who are genuinely filling a need within our existing healthcare system, and bridging a gap to help marginalized patients, stand to be unduly penalized by this standardization process. Our request is that all alternative practitioners deemed to have medically-accepted methods and tests be covered under provincial healthcare.

As such, we absolutely agree that standards are needed; however, we have concerns regarding the process this path may take. The following are issues we predict will stem from the use of only existing studies to determine efficacy of treatments:

- Studies of alternative treatments have generally used only healthy, neurotypical patients as their subjects. People with disabilities, such as multiple chemical sensitivity, fibromyalgia, and autism, can feel—and are physically affected by—substances and sensory input at much lower levels of exposure. Without studies of these treatments that are inclusive of, or composed of people with these physical differences, the efficacy cannot be adequately known. Similar to creating toxicity thresholds without the inclusion of the most sensitive, it is negligent to rule on the validity of an approach in this manner. We ask that these studies are created prior to passing judgment. We also do not want illegitimate costly treatments.
- Full genetic information of patients should be captured during treatment testing, as this is often overlooked in treatment of all environmental sensitivities.
- Collagen disorders, differences in small-fibre neuropathy, and neurological scans should be captured during treatment testing, as many with environmental sensitivities have such differences.

We would be happy to discuss this with you further, and partner on testing treatment efficacy.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Erin Caton'. The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Erin Caton

Chair, Environmental Sensitivities Coalition of Canada