

ASNFD / WHITE PAPER

Access to basic injectable medicines for naturopaths with a Swiss federal diploma under Article 52 OMéd

Proposal for a cantonal pilot framework

August 2026

Recipients

Cantonal medical officers, cantonal governments, health committees of cantonal parliaments, Fedmedcom, SERI and Parliament's Education and Science Committee

Document basis

Reference document prepared from the federal legal framework, professional competencies recognised by the Confederation and archived documents relating to the OrTra MA federal diploma

Translation note

English translation of the French policy paper dated August 2026. The arguments, assessments, quotations and references below reproduce the original document's position. They have not been updated or independently verified as part of this translation. This is not an official translation of legislation.

Contents

Executive summary

1. Introduction and context

2. The federal legal framework

3. Professional competencies: invasive procedures were part of the federal diploma

4. Archival evidence: autohaemotherapy was included in federal examination requirements

5. Safety and public-health arguments

6. Proposal: a cantonal pilot model

7. Recommendations

8. Conclusion

Annexes

Executive summary

The federal diploma in naturopathy (NPT DF), recognised throughout Switzerland since 2015, attests to standardised, high-level training. Article 52 of the Ordinance on Medicinal Products (OMéd) expressly provides that holders of this diploma may obtain cantonal authorisation to use prescription medicines under their own responsibility. To date, no canton has fully implemented this provision for basic, natural injectable medicines that are nevertheless widely used in orthomolecular medicine.

This white paper argues that naturopaths' lack of access to injectable saline (NaCl), vitamin C and magnesium stems from political and administrative obstruction rather than a training or safety barrier. It draws on archived federal-diploma documents demonstrating that invasive competencies were originally recognised, and challenges the disappearance of these references from current documents. It proposes a controlled, reversible cantonal pilot protocol to overcome this obstruction while ensuring patient safety and traceability of procedures.

1. Introduction and context

1.1 Naturopathy in Switzerland: an existing federal framework

Switzerland has a solid federal framework for recognising naturopathy. Introduced in 2015, the federal diploma in naturopathy (OrTra MA) covers four disciplines: Ayurvedic medicine, homeopathy, traditional Chinese medicine and traditional European medicine. It is recognised nationwide and is the only official, state-regulated qualification for these professions.

1.2 The issue: federal authorisation, incomplete cantonal implementation

While Article 49 OMéd entitles naturopaths to dispense non-prescription medicines (category D), Article 52 opens a broader route: cantonal authorisation for prescription medicines. Yet cantons have generally not used this possibility for basic injectable medicines that are essential to orthomolecular practice and involve low risk.

1.3 Purpose of this document

To demonstrate that access by NPT DF naturopaths to basic injectable medicines (NaCl, vitamin C and magnesium) has a legal basis, is professionally justified and medically safe; to present documentary evidence of invasive competencies originally recognised by the Confederation; and to propose a practical cantonal implementation framework.

2. The federal legal framework

2.1 Article 49 OMéd: the basis for recognition

Article 49 of the Ordinance on Medicinal Products (SR 812.212.21) provides that naturopaths holding a federal diploma may independently dispense the non-prescription medicines (category D) designated by Swissmedic (lists I, II and III). This article constitutes federal recognition of the profession and anchors it in medicinal-products law.

2.2 Article 52 OMéd: access to prescription medicines

In its consolidated version of 1 November 2025, Article 52 OMéd provides as follows (translated from the quotations in the French original):

Paragraph 1: Anyone intending to use prescription medicines in the course of their profession and under their own responsibility must hold authorisation issued by the canton in which they practise.

Paragraph 2: In addition to persons practising a medical profession, persons in the following professional categories may obtain such authorisation: [...] e. the persons referred to in Article 49 [...].

Paragraph 3: The canton specifies the medicines that the persons referred to in paragraph 2 may administer.

Paragraph 4: It ensures regular supervision by the cantonal authority or an appropriate person practising a medical profession.

Legal analysis: The Confederation has expressly included naturopaths (Article 49) among professionals eligible to access prescription medicines, subject to cantonal authorisation. Cantons have discretion to determine the list of medicines, but this discretion is not unlimited. A systematic refusal without reasons could be regarded as arbitrary, particularly when other allied health professions (midwives, chiropractors and optometrists) already benefit from this possibility.

2.3 Article 118a of the Federal Constitution

Approved by 67% of Swiss voters in 2009, Article 118a requires the Confederation and the cantons to take complementary medicine into account when implementing health policy. A canton refusing to apply Article 52 to naturopaths, despite the existing federal framework and the public vote recognising these medicines, would disregard this constitutional requirement.

3. Professional competencies: invasive procedures were part of the federal diploma

3.1 The OrTra MA professional profile: state-recognised invasive procedures

The federal diploma in naturopathy (OrTra MA) rests on a professional profile validated by the Confederation. Several training pathways include invasive skin procedures requiring rigorous mastery of asepsis, anatomy and management of bleeding and infection risks.

Traditional Chinese medicine (TCM)

- Acupuncture: clean needle technique, involving insertion of fine needles through the skin.
- Moxibustion: application of heat by burning herbs on or above the skin.
- Cupping: skin stimulation through suction, which may cause redness and bruising.
- Gua sha: skin scraping.

Traditional European medicine (TEM)

- Wet cupping: a bloodletting technique using skin incisions under suction, intentionally breaking the skin barrier and allowing blood to flow.
- Baunscheidt method: multiple skin punctures using a plum-blossom hammer, producing small skin lesions.
- Hirudotherapy: application of medicinal leeches (*Hirudo medicinalis*), which bite the skin, inject anticoagulant saliva and suck the patient's blood; management of post-treatment bleeding and dressings.
- Autohaemotherapy: venepuncture, preparation of the patient's blood and intramuscular reinjection.

Ayurvedic medicine

- Diversion and purification techniques involving procedures on body tissues.
- Application of active substances to mucous membranes and skin in specific therapeutic settings.

3.2 The technical-competence argument: injections are less invasive than existing training procedures

If the federal diploma already trains naturopaths to incise skin for wet cupping, handle leeches that bite and suck blood, make multiple punctures with mechanical instruments, perform venepuncture for autohaemotherapy and insert acupuncture needles through skin, then injecting a sterile NaCl, vitamin C or magnesium solution into a muscle or vein is technically less complex, less traumatic and less risky than procedures already taught and examined by the state.

The basic technical competencies - asepsis, vascular and muscular anatomy, handling sterile equipment, preventing infection and managing minor complications - have already been acquired, validated and certified by the Confederation.

3.3 Additional training: an easily built bridge

Certified additional training in injection techniques (IV, IM and SC), validated by the cantonal medical officer or a recognised institute, can readily complement the existing profile without calling the federal diploma into question. This model is already used for other allied health professions.

4. Archival evidence: autohaemotherapy was included in federal examination requirements

4.1 Documented evidence

Archived documents for the OrTra MA federal diploma in traditional European medicine, awarded from 2015 onwards, contain supplementary explanations of requirements detailing the competencies required for the Advanced Federal Professional Examination.

These documents, validated by the Organisation of the World of Work in Alternative Medicine (OdA) and the Quality Assurance Commission (CoAQ), explicitly included the following (translated from the original quotations):

Physical methods: e.g. detoxification techniques such as the Baunscheidt method, cupping or leeches; hydrotherapy, manual therapy, massage, cellular wraps, aromatherapy.

Therapeutic methods - subtle substances: e.g. phytotherapy, orthomolecular therapy, Schüssler, Bach flowers, bioenergetics, autohaemotherapy.

Autohaemotherapy was therefore listed as a therapeutic method involving subtle substances, alongside phytotherapy and orthomolecular therapy.

4.2 The document's disappearance from official archives

This official, OdA-validated document is no longer accessible in the organisation's current archives. Its disappearance is particularly troubling because autohaemotherapy - an invasive procedure involving venepuncture and reinjection - provided formal evidence that the federal diploma included competencies in parenteral procedures.

4.3 What this reveals

The removal or concealment of this document from official archives suggests a retrospective revision of the federal diploma's competencies. If autohaemotherapy disappears from public references, cantonal authorities can more easily claim that naturopaths are not trained in invasive procedures, thereby justifying refusal to apply Article 52.

This institutional amnesia is not a filing error. It forms part of a strategy of retrospective dequalification intended to deprive naturopaths of a right nevertheless written into law.

4.4 Qualification level: evidence of level 6

The diploma supplement issued by SERI clearly states:

National Qualifications Framework for Vocational and Professional Qualifications: level 6. European Qualifications Framework: level 6.

Classification at level 6, when the training (4,250 hours, invasive procedures and four disciplines) warranted level 7, constitutes structural undervaluation of the diploma. The reform of 1 October 2026, which will award the supplementary title 'Professional Master' (level 7), merely corrects an injustice experienced by practitioners for ten years.

5. Safety and public-health arguments

5.1 Profile of the medicines concerned

The three injectable medicines covered by this proposal have a high safety profile:

NaCl 0.9% (physiological saline)

Use: hydration, dilution and basic infusion. Risk: negligible. Comparison: used by nurses, paramedics and midwives; sometimes category D depending on packaging.

Injectable vitamin C (ascorbic acid)

Use: supplementation, fatigue and immunity. Risk: low; risk of kidney stones with very high doses over the long term, manageable through a protocol. Comparison: already used in private clinics under nursing supervision.

Injectable magnesium (sulphate or chloride)

Use: cramps, stress and supplementation. Risk: low; risk of hypotension at high doses, manageable through a protocol. Comparison: widely used in hospital and outpatient settings.

These substances are not synthetic medicines with major adverse effects. They are micronutrients and basic physiological solutions with well-established tolerability and standardised dosing.

5.2 Comparison with other professions

Article 52 OMéd already authorises midwives to use prescription medicines during childbirth; chiropractors to undertake certain medicinal procedures; optometrists to use topical ophthalmic diagnostic medicines; and paramedics to use emergency medicines. These professions share specialist expertise and targeted training. As a specialist in orthomolecular and natural medicine, the naturopath is logically placed to administer injectable micronutrients within their field of competence.

5.3 The risk of the status quo

Lack of a cantonal framework does not mean lack of practice. Patients already attend private clinics, often at high cost, for vitamin infusions. Nursing staff carry out these procedures without an integrated naturopathic framework. Cantonal regulation would instead allow an existing informal practice to be regulated, standardised and made safer.

6. Proposal: a cantonal pilot model

6.1 Guiding principles

- Reversible: the canton may stop the project if a genuine problem arises.
- Restricted: only three medicines - injectable NaCl, vitamin C and magnesium.
- Supervised: medical oversight complying with Article 52 paragraph 4 OMéd.
- Traceable: mandatory recording of every procedure.
- Trained: certified additional training in injection techniques.

6.2 Proposed protocol

Step 1: individual authorisation

The NPT DF diploma holder applies to the cantonal medical officer, providing the federal diploma; a certificate of additional IV, IM and SC injection-technique training from a recognised institute; and evidence of enhanced professional liability insurance.

Step 2: list of authorised medicines

The canton establishes a restricted list: physiological saline (NaCl 0.9%) for dilution and basic infusion; injectable vitamin C at protocol-standardised doses; and injectable magnesium at protocol-standardised doses.

Step 3: safety protocols

- Mandatory history-taking before each procedure: renal history for vitamin C and cardiac history for magnesium.
- The practitioner maintains a procedure register recording date, patient, product, dose, administration route, batch and signature.
- Periodic medical oversight under Article 52 paragraph 4: a designated physician reviews the registers quarterly.
- Maximum doses are limited through the cantonal protocol.

Step 4: duration and evaluation

- Experimental protocol lasting 24 to 36 months.
- Annual report to the cantonal medical officer: procedure numbers, any adverse effects and patient satisfaction.
- Final evaluation by an ad hoc committee comprising the cantonal medical officer, a naturopathy representative, a conventional physician and a pharmacist.

6.3 Benefits for the canton

- No legal risk: OMéd provides the framework and supervision is ensured.
- Practical data: a field study of safety and effectiveness.
- Response to public demand: complementary medicine enjoys public support (Article 118a of the Constitution).
- Cost reduction: delegation of simple procedures and relief of medical practices for basic supplementation.

7. Recommendations

To the cantons

1. Recognise that Article 52 OMéd applies to NPT DF naturopaths and that systematic refusal is legally questionable.
2. Establish a pilot project within 12 months based on the model described above.
3. Appoint a designated physician for regular supervision under Article 52 paragraph 4, in collaboration with Fedmedcom.

To Fedmedcom and professional associations

4. Structure additional injection-technique training recognised by the cantons.
5. Prepare a model appeals dossier for naturopaths facing an unreasoned cantonal refusal.
6. Demand reinstatement of autohaemotherapy competencies in official federal-diploma documents and explanations for their disappearance from the archives.
7. Negotiate clarification with Swissmedic on the classification of these natural injectable medicines.

To cantonal parliaments

8. Submit motions asking the cantonal government to specify the medicines authorised for naturopaths under Article 52.
9. Place recognition of orthomolecular procedures in cantonal health law on the agenda.
10. Question the cantonal government on its Article 52 OMéd policy and the reasons for refusing to apply it to naturopaths.

To SERI and OdA

11. Restore autohaemotherapy to the official federal-diploma competencies if it has been removed, and explain its disappearance from the archives.
12. Ensure traceability of changes to federal-diploma reference documents in accordance with principles of good administration.

8. Conclusion

Access to basic injectable medicines (NaCl, vitamin C and magnesium) for naturopaths holding a federal diploma is neither a professional whim nor medical overreach. It fits the existing federal legal framework (Articles 49 and 52 OMéd), rests on already recognised professional competencies - invasive skin procedures in the federal diploma, including bloodletting, leeches, multiple punctures and autohaemotherapy - and meets legitimate public-health demand.

Archived documents demonstrate that autohaemotherapy was included in federal examination requirements. Its disappearance from official archives, combined with the arbitrary level-6 classification of the diploma for ten years, reveals a retrospective dequalification strategy intended to deprive naturopaths of a right nevertheless written into law.

The only remaining obstacle is political. It can be removed if just one canton is willing to test a pilot protocol. Switzerland has proven its capacity for pragmatic federalism: a pioneering canton will set a precedent that will ultimately serve as a model.

It is time to move from legal texts to action, and to stop rewriting history to justify inaction.

Annexes

A. Legal references

- Federal Constitution of the Swiss Confederation, Article 118a (complementary medicine).
- Ordinance of 21 September 2018 on Medicinal Products (OMéd), SR 812.212.21, Articles 49 and 52.
- Ordinance of 25 January 2023 amending OMéd (AS 2023 41), effective from 1 April 2023.
- Federal Act of 15 December 2023 on health professions (LPTh), Article 9 et seq. [Reference reproduced as stated in the French original.]

B. Professional references and archived documents

- SERI ordinance on initial vocational training for naturopaths with a federal diploma (OrTra MA), professional profile.
- OrTra MA TEM federal-diploma supplement, EQF/NQF level 6, issued by SERI.
- ‘Supplementary explanations of TEM requirements’, OdA/CoAQ document validated for the Advanced Federal Professional Examinations, mentioning autohaemotherapy as a therapeutic method involving subtle substances.
- Fedmedcom: cantonal requirements for practising complementary medicine.

C. Medical and institutional sources

- Swissmedic: lists of medicines for naturopaths (lists I, II and III).
- Canton of Bern public-health service website: authorisation requirements for naturopaths.
- CHUV / Revue Médicale Suisse: articles on orthomolecular medicine and vitamin infusions.

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