

## Consultation: Regulation of Self-Care Products in Canada October 2016

ISMP Canada is an independent, not-for-profit organization. We analyze reports about medication incidents and often identify system issues that can increase the chances of harmful errors occurring. This helps us to suggest safer ways to prescribe, package, dispense or take medication.

Canadians trust that self-care products in Canada are safe; we commend the identification of gaps in the current system and the steps towards strengthening Health Canada oversight. Any clarity that can be provided to consumers is important.

### **Our comments:**

We agree that any health claims on a product must be supported by scientific data.

We also support the use of disclaimers, when appropriate, such as indicating that Health Canada has not reviewed the product for effectiveness.

We support the risk-based approach for self-care products and the proposed safety oversight approach. We are hopeful, however, that this does not translate into any reduced oversight by Health Canada.

A product number is important and we also recommend encouraging the use of automated identification (e.g. barcoded information).

We support strengthening Health Canada authorities and powers to change labels, require a recall and implement new penalties, so that appropriate communication of product information is ensured.

**Please feel free to contact us if you require more information or clarification about our work or comments.**

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