



INNOVATION POLICY BRIEFING

OPINION HEALTH CARE

Health Canada's new regulatory framework matters, because self-care matters

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By GERRY HARRINGTON

On Sept. 8, Health Canada launched public consultations on a proposal to modernize the approach to the regulation of non-prescription drugs (OTC medicines), natural health products (NHPs), and cosmetics. The proposed regulations could support self care by helping Canadians identify which products are supported by science and which are not.

As a consequence of this consultation, parliamentarians are likely going to hear a great deal over the coming weeks and months about self care, an area of health care that rarely enters into our policy discussions. Self-care encompasses the decisions and actions people take every day to maintain health, prevent disease, and promote wellness. The use of products such

as Crest, Tums, Reactine, or Polysporin are an important part of overall self-care. Every day, millions of Canadians use them to treat their minor aches and pains, alleviate the symptoms of allergies or colds, and relieve their upset stomachs and other minor ailments. They use them to protect themselves from the harmful rays of the sun, to prevent cavities and gum disease or to help with smoking cessation. They also use them when they practice good hygiene and use personal care products to promote wellbeing.

When Canadians practise self-care, they take greater control over their health and they contribute to the sustainability of our healthcare system. Self-care products such as pain relievers, cold and allergy medications, and stomach remedies provide Canadians with the tools they need to manage these ailments on their own and avoid unnecessary doctor visits. Sunscreens, anti-caries toothpastes, and nicotine replacement products help prevent oral health problems and even cancers and cardiovascular diseases that can be devastating to individual health and very costly to treat in our over-burdened healthcare system.

How we regulate self-care products matters, because self-care matters. In 2011, Consumer Health Products Canada commissioned a survey that examined how Canadians managed three common minor ailments; coughs and

colds, headaches and upset stomachs. Of those who had suffered from one of these ailments in the previous 30 days, the vast majority dealt with them through the practice of self-care, while 14 per cent reported going to the doctor. To be clear, not all of those doctor visits were inappropriate, however, one out seven of those who saw a doctor did so despite reporting their symptoms were relatively mild. That may sound like a small number, just two per cent of those who experienced one of those three minor ailments, but that translates into almost three million doctor visits a year. Conservatively, that represents enough physician time to provide a family doctor to 500,000 Canadians who currently don't have one. Clearly, self-care matters.

Health Canada is proposing to end the current patchwork of regulations for self-care products, where OTC medicines are regulated under the rules for prescription drugs, NHPs are regulated separately based on having active ingredients that occur in nature, and cosmetics under yet another separate framework. Health Canada is proposing to replace this patchwork with a single system that regulates all these products according to the risks they pose and would only allow claims for the diagnosis, treatment, prevention, mitigation, or cure of a disease or abnormal physical condition that are supported by science.

So what would this proposal do? For one, it would help Canadians make more informed

decisions when they practise self-care. Unlike the current system, where two products could sit side-by-side on a pharmacy shelf sharing similar, Health Canada-approved claims—one supported by science, the other based on a non-scientific approach such as traditional use or homeopathy—the new system would only allow health claims that are supported by science. This would go a long way to address the confusion among consumers about the basis for product claims.

What would the proposal *not* do? The proposal would not take away consumer access to the natural health product ingredients currently available. Under Health Canada's new approach, these products would continue to be available—many (low risk products) with an even shorter regulatory path to market—but with restrictions on the claims they can make to ensure Canadians are not misled about the basis for those claims.

The consultation is in its early stages. There are many details to be explored and developed. What is vital at this stage is that we don't get confused about the objective of the exercise. This is not about limiting access to natural ingredients; it is about transparency for consumers who want to make informed self-care choices, and that's what really matters.

Gerry Harrington is vice-president of policy and regulatory affairs at Consumer Health Products Canada.