



October 21, 2016

Health Canada
Health Products and Food Branch
Natural and Non-Prescription Health Products Directorate
250 Lanark Avenue, A.L. 2003C
Ottawa, Ontario K1A 0K9

Sent via email: nnhpd_consultation_dpsnso@hc-sc.gc.ca

Dear Sir/Madam,

Re: Consulting Canadians on the Regulation of Self-Care Products in Canada

Food Allergy Canada is pleased to provide feedback on Health Canada's consultation for the Regulation of Self-Care Products in Canada. We appreciate Health Canada seeking comments from the public that will help to inform changes to regulations for personal self-care products.

As the leading national advocacy and education organization for Canadians affected by food allergies, we believe that consumers have the right to know about food allergens that might be included in these products.

About food allergies

Food allergy is a growing public health issue in Canada, affecting more than 2.5 million Canadians. As a very small amount of a food allergen, when ingested, can cause a serious and potentially life-threatening reaction, and there is no known cure for food allergy, avoidance is key to staying safe. In order to help Canadians with food allergies make safer choices, Health Canada updated its laws regarding ingredient [labelling for allergens](#) on pre-packaged products in 2012. Our organization advocated for this regulatory change for more than a decade and was very pleased to see Health Canada move forward with these much-needed updates to the labelling requirements.

While our organization promotes measures for individuals with food allergies to self-protect, consumers with food allergies need complete and accurate ingredient information that includes Canada's priority food allergens in self-care products in order to avoid their allergen.

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Recommendations

Given that “*Health Canada continues to make more information available to Canadians than ever before*” as expressed in the Regulatory Transparency and Openness Framework, and the proposed risk-based approach, Food Allergy Canada recommends the following updates to the regulation of self-care products as it pertains to the labelling of food allergens:

- Require manufacturers to provide a complete and accurate ingredient list that includes priority food allergens, for each product
- Use plain, simple language for priority food allergens, as currently required for pre-packaged food products, e.g. whey (milk)
- Follow similar labelling requirements as regulated by Health Canada for pre-packaged products that require priority allergens to be declared in the list of ingredients, OR in the statement: “Contains” (see example below)

Ingredients: Sugar, Flour, Ovalbumin, Monocalcium phosphate monohydrate, Sodium bicarbonate, Potassium bitartrate
Contains: Egg, Wheat

OR

Ingredients: Sugar, **Flour (Wheat), Ovalbumin (Egg)**, Monocalcium phosphate monohydrate, Sodium bicarbonate, Potassium bitartrate

- Follow Health Canada recommendations if manufacturers elect to use precautionary statements for priority food allergens: *Health Canada has recommended the single statement “May contain:” when precautionary labelling is needed*

By making these changes to the regulatory framework, Canadians with food allergies will be able to have access to key information they need when selecting self-care products and avoid an allergic reaction thereby improving consumer safety and quality of life. Clear, complete and accurate ingredient labelling will help fulfill Health Canada’s mandate for this public consultation that “*Canadians can have further confidence in the products they choose.*”

Next Steps

Food Allergy Canada would be pleased to work with Health Canada and stakeholders from the medical community and industry, to establish appropriate measures to help protect individuals with food allergies. By working together, we can create effective regulations that guide the self-care products industry and reflect the needs of a growing number of Canadians affected by food allergy.

Thank you for the opportunity to provide our feedback on this important initiative. We look forward to hearing back from you as you move toward modernizing the regulations and standards around self-care products

Sincerely,



Laurie Harada
 Executive Director
 Food Allergy Canada