



July 22, 2016

Hon. Jane Philpott
Minister of Health
70 Columbine Driveway
Tunney's Pasture
Ottawa, Ontario K1A 0K9

Dear Minister,

The Canadian Association of Optometrists (CAO) would like to congratulate Health Canada on its recent release of the Good Label and Package Practices, Guide for Prescription Drugs. We feel the new guidelines are a strong step toward improving the safe use of health products, which has been missing for many years and we are very pleased that the Plain Language Labelling Regulations are being developed and addressed. Our members are optimistic that industry will embrace the new guidelines and make product labels and packages easier for consumers and health professionals to read and understand.

This guidance is provided in two "Good Label and Package Practices" guides, one for non-prescription (i.e. over-the-counter) drugs and natural health products, and the other for prescription drugs. Together, they will provide industry with direction for designing clear and effective health product labels and packages. There were specific recommendations in the documents aimed at the elderly, vision impaired, and those with colour blindness, and these are welcomed by optometrists.

However, the CAO urges Health Canada to take further steps to protect the health and safety of Canadians by putting these recommendations into regulation, similar to the current Food and Drug Regulation. This latter regulation requires the font of the proper name be, at minimum, half the size used for the brand name. While the CAO was not consulted on these guidelines, the Association would be pleased to work with Health Canada as changes and revisions are made in the future. Two studies¹ by optometrists published in recent literature were not

.../2



included in the guidelines, and these will be of interest to Health Canada. I enclosed these studies for your review and consideration.

CAO continues to be engaged and interested in this issue. We would welcome a face to face meeting with senior officials in the Marketed Health Products Directorate, in order to share our concerns as primary health care practitioners, as well as the concerns that we hear from our patients on clear labels, instructions and packaging.

The Canadian Association of Optometrists (CAO) is the national voice of optometry and is dedicated to collaboratively advancing the highest standard of primary eye care through the promotion of optimal vision and eye health, in partnership with all Canadians. The Association represents more than 4,600 optometrists who care for patients across the country.

Regards,

Dr. Barry Thienes
President
Canadian Association of Optometrists

cc. Dr. J. Patrick Steward, MD, CCFP(EM),
Director General, Marketed Health Products Directorate

ⁱ Leat et al., Improving the legibility of prescription medication labels for older adults and adults with visual impairment. *Canadian Pharmacists Journal*. 2016; 149(3); 174-84.

ⁱⁱ Leat et al., The legibility of prescription medication labelling in Canada: Moving from pharmacy-centred to patient-centred labels. *Canadian Pharmacists Journal*. 2014; 147(3); 179-87.