



Speech-Language & Audiology Canada
Orthophonie et Audiologie Canada
Communicating care | La communication à cœur

Mark MacKinnon, Executive Director, Professional Regulation and Oversight
Ministry of Health
3rd Floor, 1515 Blanshard Street
Victoria, BC V8W 9P4

March 6, 2026

Re: Consultation on Proposed Policy Change: Retail Sale of Non-Prescribed Hearing Aids in British Columbia

Dear Mr. MacKinnon,

Thank you for the opportunity to respond to the Ministry of Health's consultation regarding the proposed authorization of the retail sale of Health Canada - approved non-prescribed hearing aids (NPHAs) for adults with mild to moderate hearing loss. We appreciate the Ministry's proactive efforts to enhance accessibility and affordability of hearing health supports for British Columbians.

Federal Regulatory Context and Resulting Provincial Responsibilities

Under the current federal framework, Health Canada classifies all hearing aids as Class II medical devices and does not distinguish between prescription devices and those intended for retail sale as NPHAs. As a result, the federal framework does not include safety, performance, or labelling standards tailored to NPHAs, despite their distinct self-selection and self-management context.

In the absence of this federal differentiation, provinces and territories are responsible for establishing conditions that support safe access, including consumer-appropriate safeguards, guidance, and oversight mechanisms.

Need for a Federal "Non-Prescribed" Hearing Aid Category

In alignment with Speech-Language & Audiology Canada's (SAC) evidence-based guidance, we encourage the Province of British Columbia to formally recommend that Health Canada establish a distinct NPHA category with accompanying national standards for safety, performance, and labelling. [SAC's position](#) emphasizes that such standards are essential for ensuring the public can safely navigate NPHA device use and understand their benefits and limitations.

A dedicated federal category would support consistent consumer protections across jurisdictions, reduce duplication of provincial regulatory efforts, and ensure clarity for manufacturers and retailers.



Speech-Language & Audiology Canada
Orthophonie et Audiologie Canada
Communicating care | La communication à cœur

Provincial Implications in the Absence of Federal Action

Until Health Canada creates such a category, the province of British Columbia would be required to implement its own framework to ensure consumer safety and proper device use, including:

- Implement testing and verification processes to confirm device output levels (e.g., safe maximum power levels), performance claims, and suitability for mild to moderate hearing loss;
- Establish mandatory provincial labelling and point-of-sale requirements, including contraindication warnings, age limits, guidance on when to seek audiological or medical evaluation, and clear user instructions;
- Develop public education initiatives to ensure consumers understand the specific applications and limitations of NPHAs and when professional assessment is required.

These responsibilities represent a substantial regulatory commitment for the province and may require new infrastructure or partnerships to ensure enforcement and quality assurance.

Recommendations

To support safe and equitable access for British Columbians, we respectfully recommend that the Ministry:

1. Advocate to Health Canada for the creation of a dedicated OTC hearing aid category with standardized federal labelling, safety, and performance requirements.
2. Develop interim provincial safeguards - including testing protocols, labelling standards, and public-facing education - should BC move forward before federal standards are established.
3. Maintain alignment with national best practices, including SAC's evidence-based guidance on the safe and informed use of OTC hearing technologies.

We appreciate the Ministry's leadership and commitment to improving access to hearing health services and stand ready to support further policy development in this area.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Luciana Nechita', with a stylized flourish at the end.

Luciana Nechita

Chief Executive Officer/ Chef de la direction
Speech-Language & Audiology Canada
Orthophonie et Audiologie Canada