



The Voice of Canada's
Personal Care
Products Industry

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September 15th, 2017

The Honourable Ginette Petitpas Taylor, P.C. M.P.
Minister of Health
House of Commons
Ottawa, Ontario
Canada K1A 0A6

Email: Ginette.PetitpasTaylor@parl.gc.ca

Re: Congratulations and Meeting Request

Dear Minister Petitpas Taylor,

On behalf of Cosmetics Alliance Canada (formerly the Canadian Cosmetic, Toiletry and Fragrance Association) and our over 150 member companies, I am writing to add our congratulations and best wishes to the many you are no doubt receiving on your appointment as Minister of Health.

As the voice of the cosmetics and personal care products industry in Canada, which represents some \$10 billion in annual retail sales and employs tens of thousands of Canadians, our association has a long history of working collaboratively with Health Canada on the regulation of our products to ensure their safety and efficacy. We are also fully engaged in, and supportive of, Canada's world leading Chemicals Management Plan (CMP) which reviews ingredients from both a human health and environmental perspective.

As the key Minister for the regulation of our products, we would appreciate the opportunity to meet with you to introduce you to our industry as well as provide you with our perspective on issues and initiatives that are critical to our industry. More specifically, we would like to focus on three urgent matters of which the most significant and over-arching is Health Canada's continuing work on the Self-Care Products Regulatory Framework. This important reform in the regulation of low-risk self-care products has been proposed by Health Canada for over a decade. Under the leadership of Minister Philpott, it has received the dedicated time and resources needed to move it forward. We trust that this work will continue and are eager to discuss its importance as well as our support for this long-awaited reform.

The other two issues we wish to discuss arise from the fact that the Self-Care Framework is not yet in place. The first is Health Canada's plan to introduce full cost recovery for products currently classified as "drugs" outside of the implementation of the Self-Care Framework. In practice, this will mean that certain shampoos, toothpastes, and sunscreens (even SPF lipsticks) will be subject to a fee structure intended for prescription drug products while the same products classified as "natural health products" or "cosmetics" will continue to be exempt from any cost recovery. The Self-Care Framework is intended to address such discrepancies and we would suggest that any fee changes for products included in the Self-Care Framework be excluded from this current initiative and be addressed in the implementation of the Framework.

The second issue is the need to renew Health Canada's Pilot Project for the importation of sunscreen products from the United States and to extend it to other trusted jurisdictions (i.e. European Union, Mexico and Japan) and to other similar low-risk product categories. Currently, certain sunscreens and cosmetics (including a lipstick) with an SPF claim, toothpastes, mouthwashes and other personal care products can be classified as a "drug" and so are subject to regulations designed and intended for pharmaceuticals which require the products to be quarantined and re-tested in Canada. The same products classified as "natural health products" or "cosmetics" are not subject to this same requirement, nor does the United States have a similar requirement for over-the-counter drugs imported into the U.S. Recognizing the inappropriateness of this situation, and in the interest of providing some interim relief as the Self-Care Framework is being developed, Health Canada implemented a one-year pilot last January which allows for direct importation. This initiative has been showcased by your Government in the current NAFTA renegotiations to demonstrate Canada's commitment to improving regulatory alignment. We, of course, want to ensure that this pilot is renewed and expanded in 2018 or until the Self-Care Framework is implemented.

I would also like to advise you that Cosmetics Alliance Canada is completing our review of the Environment Standing Committee's report on the Canadian Environmental Protection Act (CEPA). We will be writing to you and your department shortly to outline our concerns with this report, many of which we understand are shared by other stakeholders.

Given the great demands on the time of a new Minister, we will work with your staff to accommodate any time or location that will facilitate your schedule. Diane Kozak from our office will be in touch to discuss possible arrangements (dkozak@cosmeticsalliance.ca or 905-890-5161 ext. 223).

Once again, our congratulations on your appointment and best wishes for much success in the service of the people of Canada!

With best regards,



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