

Improving Labelling of Homeopathic Products - Discussion Groups -

Executive Summary

This report provides a summary of the feedback received from Canadian consumers during three discussion groups about homeopathic product labelling held in February 2021.

Patients for Patient Safety Canada (PFPS) and Healthcare Excellence Canada (formerly Canadian Patient Safety Institute), with advice from Health Canada, partnered to conduct these consumer discussion groups. PFPS engaged the services of an independent consultant, Dr. Diane Aubin of Diane Aubin Consulting (DAC), to recruit participants, facilitate the discussion groups, and report on the results.

As you may know, Health Canada is currently in the process of updating the labelling requirements for all natural health products (NHPs), including homeopathic products, as part of the improved NHP labelling proposal. Within this initiative, Health Canada is proposing changes to its approach to the labelling of homeopathic products to increase transparency with consumers about the basis of the approval of these products. As part of this work, Health Canada is proposing to expand the use of a statement on homeopathic products that will clarify that authorization of these products is not based on modern scientific evidence.

The report on the discussion groups with consumers form the basis of PFPS's and HEC's feedback on this proposal to ensure that the proposed statement language is clear and the formatting increases visibility for consumers. The purpose of the discussion groups was to provide Health Canada with consumer feedback on proposed homeopathic statement options, including the wording and format of the statement.

Upon consultations with Health Canada, it was determined that the most effective method to garner input from consumers was through discussion groups facilitated by an independent consultant, during which consumers were free to voice their opinions in a confidential and anonymous manner. There were 25 participants (8 male and 17 female) of various age, race, education level and geographical location, with 8 in the French discussion group and 17 in the two English groups. Three participants self-identified as visually impaired.

The consumer discussion groups consisted of three sections. The objective of the first section of the discussion was for participants to identify any difficulty differentiating a non-prescription drug, a natural health product and a homeopathic product with similar health claims based on a mock-up of the principal display panel. Most of the participants considered the three products to be different.

Among the many differences noted, the most often mentioned was that the label for the homeopathic product mentioned that it was a homeopathic medicine. However, many noted that this text was very faint, and might go unnoticed by the general consumer if they were not looking for it. The second most often noted difference was that the non-prescription drug and natural health product labels listed active ingredients on the principal display panel, whereas the homeopathic product label did not.

The objective of the second section was for participants to share feedback on the proposed wording used in the statement on homeopathic product labels. The majority of participants felt that it was important to have a statement on the label about homeopathic products and the evidence/information required to approve them for the following reasons:

- To distinguish homeopathic products from other self-care products
- So that the consumer knows what they are buying and taking
- So that consumers can make an informed choice
- To inform consumers about homeopathic products

There were numerous suggestions made to make the wording of the statement more clear, simple and direct. A few participants noted that the literacy level of the text seemed very high and suggested that the language be simplified.

The objective for the third section was for participants to provide feedback on the format of the proposed homeopathic statement on product labels, including text colour, background colour, location on the package, and use of a border around the statement. All participants thought that the text of the statement should be black on a white background so that:

- It is clearly visible, especially for those who are older or visually impaired
- It is immediately noticeable and
- Colours with poor contrast could not be used for the text and background on the label

A box surrounding the text was also seen as a benefit to the statement's visibility and noticeability. Also, participants noted that the font size of the statement should be at least as big as the rest of the text on the label. The majority of participants felt that the statement should be on the front of the package. A significant minority thought that it should appear twice: once on the front, and once on the back or side of the package in the Product Facts Table.

The discussion groups were successful as they met the goal of eliciting feedback from consumers. The participants seemed to freely give their opinions, supported and encouraged each other, and engaged in respectful debates when they disagreed. The objectives of answering the questions of specific interest to Health Canada were also met, as the results provide helpful feedback to inform Health Canada's proposal going forward.