



Canadian Hard of Hearing Association

BC Chapter & Vancouver Branch

March 25, 2026

Executive Director, Professional Regulation and Oversight
Ministry of Health, 3rd Floor, 1515 Blanshard Street
Victoria BC V8W 9P4 Email: PROREGADMIN@gov.bc.ca

Re: Retail Sale of Non-Prescribed Hearing Aids for Adults

On behalf of the CHHA BC and CHHA Vancouver, I am writing regarding our position on the proposed change to enable the retail sale of non-prescribed hearing aids for adults with mild to moderate hearing loss, often referred to as over-the-counter hearing aids.

ISSUE OF ASSESSMENT

While the current system is not without its flaws, a key component is the assessment of hearing loss of the consumer by a qualified, trained professional which is a hearing instrument practitioner or audiologist licensed to practice in British Columbia. They can recommend hearing aids according to the level of a person's hearing loss and ensure fittings are in accordance with scientific audiometric measures. The result is that the consumer has the best possible access to sound and that there is no risk of cochlea damage or discomfort from over-amplification. In addition, the person with a hearing loss may require counselling from their hearing health care provider and mentoring support in their adjustment journey, including learning communication strategies.

Recommendation No. 1

CHHA recommends that assessment be required and that the sale of non-prescribed hearing aids be subject to the provision of credible documentation that meets acceptable standards.

While we understand that often the approach is to waive assessments for OTC, we believe a hearing assessment should be required for several reasons. Retailers need to know who is eligible for OTCs, which according to the proposal is for those over 18 years of age with mild-moderate hearing loss. Without an assessment, persons with hearing loss will not know their level of hearing loss and will not be able to determine if the loss is due to a treatable condition such as an earwax problem or eardrum perforation. Our recommended approach is similar to doctors prescribing medication which is filled by pharmacists.

ISSUE OF ELIGIBILITY

It is unclear in the table about the proposed change what level of hearing loss is recommended for OTCs. In the first line, it states that the proposal is to enable the sale of devices for those with mild-moderate hearing loss. In the next line, it excludes moderate hearing loss. There is a significant difference between mild and moderate hearing loss, and we believe that those with moderate hearing loss should be exempt from a change in the regulation. We support OTCs ONLY for those with mild hearing loss but not for those with more significant hearing losses, namely, moderate, severe and/or profound loss. If OTCs

are approved for those with mild hearing loss, it should not become the wedge that opens the door to an expansion of eligibility criteria.

Recommendation No. 2

We recommend that the eligibility category for OTCs ONLY be people with mild hearing loss.

ISSUE OF QUALITY OF OTCs

Safeguards need to be in place as to the type of devices that can be sold over the counter. The proposed regulations refer to Health Canada-approved NPHAs. These regulations are currently inadequate for consumer purchase; they were initially developed as regulations for devices to be sold by professionals. If consumers are making the purchase, stricter regulations are required to protect the public and guard against poor quality devices being sold that can do more harm than good.

Greater public protection can be furthered by clear labelling guidelines on who may or may not use OTC hearing aids and when to consult with a health professional, what to do in an adverse situation, and what are safe output levels. Consumers need to be cautioned that OTCs typically come with generic “one-size fits-all” earmolds which can do harm if not properly adjusted. Furthermore, if an OTC does not meet their needs, consumers should be given information about next steps and should be referred to qualified professionals who can guide them through these steps.

Recommendation No. 3

That Health Canada regulations for NPHAs be strengthened to provide further public protection including labelling guidelines that include safe output levels and recommended pathways for resolving hearing problems. That the BC Government would advocate with Health Canada for these regulations.

CONCLUSION

CHHA BC and CHHA Vancouver are supportive of technological advances; many of our members already benefit from the use of technology – hearing aids, cochlear implants and assistive devices – and support them for others who are eligible, following a proper assessment of their hearing loss. We are open to Health Canada-approved NPHDAs for persons with mild hearing losses, assuming improved regulations for approved devices, proper labelling, and referral to hearing healthcare providers as needed.

Finally, we want to state that no person should feel compelled to pursue an OTC because of concerns about the costs of hearing aids. The system should be more affordable for everyone than it is currently. There should be financial support for persons with hearing loss regardless of income and age, as is provided in Alberta and Ontario.

CHHA BC and CHHA Vancouver are consumer-based, non-profit self-help organizations of hard of hearing consumers and their support networks. We are committed to providing supportive environments, education, resources, referrals and advocacy to improve the lives of those with hearing loss. We are dedicated to decreasing isolation and removing barriers for persons with hearing loss.

Thank you for this opportunity to share our views. Please contact us if you require any clarifications.

Sincerely,

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