
Submission to:
The House of Commons
Standing Committee on Health
Study on Bill C-6
May 2009



Canadian Association of Speech-Language Pathologists and Audiologists

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About CASLPA

The Canadian Association of Speech-Language Pathologists and Audiologists (CASLPA) is the national body that represents and supports the professional needs of more than 5,400 speech-language pathologists, audiologists, and supportive personnel across Canada. As part of this role, CASLPA empowers its members to maximize the communication potential of the people of Canada, including important hearing health prevention initiatives.

Audiologists are hearing health professionals who identify, diagnose and manage individuals with peripheral or central hearing loss, tinnitus and balance disorders. They provide a number of different services in this capacity, including the assessment of and intervention for hearing and balance disorders, which can include treatment, consultation, management, rehabilitation, and education.

Audiologists, speech-language pathologists and supportive personnel play an active role in promoting hearing health and encouraging government policy that ensures Canadians do not needlessly suffer from permanent hearing damage. As part of this overall campaign, audiologists, and their national association CASLPA, have paid particular attention to the hearing health of children, especially as it relates to the safety of children's toys.

Consumer Product Safety Act: A step forward for consumer safety

Bill C-6 is an important step in improving consumer product safety in Canada, placing the onus on manufacturers and suppliers to ensure that their products are safe and providing government greater powers and capacity to ensure that this occurs.

This legislation will help ensure that products which make it to consumers' homes are safe by taking a more proactive approach to consumer safety. This proactive approach includes banning the import, advertisement and sale of known unsafe products, and also providing for the testing and evaluation of others. Manufacturers, suppliers, importers, and other such entities will be required to report defects, problems or potential harm that these products cause or are likely to cause. This onus on industry to ensure product safety is a welcomed change from the status quo and helps to encourage a culture of safety for those that make and sell goods to people in Canada.

This legislation will enhance government's ability to respond quickly. This will give the Minister power to order companies to conduct safety tests on their products and will enable inspectors to ensure that Ministerial orders are being followed, and even allow for the mandatory recall of products when necessary.



CASLPA is pleased that this legislation provides necessary new powers to government, but also that the government has committed to doubling the number of product safety inspectors. They are the eyes and ears of consumer safety legislation, and increasing their numbers doubles the government's ability to anticipate and respond to consumer product issues. Severe penalties will also have a deterrent effect, discouraging companies from attempting non-compliance.

A further step to take: Protecting Children's Hearing

Absent from Bill C-6 is a commitment to reduce the acceptable decibel level for toys from the current 100 dB to a level more in line with international standards, such as the World Health Organization (WHO) standard of 75 dB. This is an important consideration as the potential danger of loud toys can be less apparent than those with, for example, choking hazards. On this issue, there are two important considerations: how the amount of permissible noise is measured, and how much noise is actually safe for children's small ear canals.

Currently, Schedule 1 of the *Hazardous Products Act* limits the amount of noise that children's toys can make to 100 decibels (dB), measured at arm's length. It is no secret that, during the routine course of play, children will hold toys substantially closer than arm's length, thereby increasing the relative noise of the toy and its risk to permanently damage hearing.

It is useful to compare the current regulatory framework with that of workplace noise requirements under the *Occupational Health and Safety Act*. Noise exposure regulations vary from province to province. In Alberta, for example, the current industrial regulation provides an allowable noise exposure of 85 dB for 8 hours, though other provinces are as low as 80 dB. In this case, a 3-decibel "exchange rate" is applied. This is used to calculate the amount by which the permitted sound level may increase if the exposure time is decreased by half. For example, using the 3-dB "rule", if the sound level increases from 85 to 88 dB, a worker may only be exposed to the sound for 4 hours, instead of 8 hours. In a workplace, exposure to 100 dB would only be considered safe for 15 minutes, and that is for adults with fully developed ears.

At birth, the inner ear is fully developed and has its full complement of hair cells, supporting cells and nerve fibres. Unlike most other tissues in the body, hair cells and nerve fibres do not regenerate when damaged. Children are more susceptible to the effects of noise because of their behaviours and also because of their smaller ear canals. A sound travelling down a child's ear canal will arrive at the eardrum at a greater intensity than in an adult who has a larger ear canal. Noise affects the hair cells in the inner ear. Repeated exposure will wear these hair cells down and eventually cause permanent damage.

The International Standards Organization (ISO) technical committee recommends that close-to-the-ear toys should not exceed 65 dB when measured in the free field and all other toys should not



exceed 85 dB. The current Canadian limit of 100 dB permits a noise level which is potentially dangerous, particularly because it does not take into account how the typical child plays with toys.

C-357, a Private Members Bill that was introduced in the House of Commons in April, would amend the relevant section of the *Hazardous Products Act* to reduce the maximum noise level in toys to 75 dB. Adopting this standard would provide a much safer standard that better reflects predominant international standards for toy safety. It is also important that the measurement of noise levels be adjusted to better reflect how children play with toys.

Conclusion

Through C-6, the government has shown a firm commitment to improving Canada's consumer product safety, requiring manufacturers and suppliers to ensure their products' safety, while giving the government the tools needed to ensure accountability. This action is to be commended.

It is important that government extend this same effort to help protect the auditory health of children in Canada by further limiting the decibel level of "noisy" toys to the WHO level of 75 dB and improving the method by which this level is measured. Under the current Canadian standards, the amount of allowable noise of a child's toy would be considered a workplace health hazard, even at moderate exposure. Given the irreversible nature of hearing damage due to noise exposure, it is important that government seize the opportunity of this legislation to include a safer noise standard for children's toys.

Members of CASLPA have seen first-hand the hearing, speech and language implications that can arise from hearing loss due to unacceptable noise conditions. We encourage the committee to take the necessary action on this important hearing health prevention legislation.

