

Canadian Association of Speech-Language Pathologists and Audiologists

Presentation to the House of Commons Standing Committee on Health

May 28th, 2009

Hello, my name is Ondina Love, Executive Director of the Canadian Association of Speech-Language Pathologists and Audiologists, or CASLPA. Joining me today is Dr. Chantal Kealey, Director of Audiology with CASLPA. I'd like to thank you for having us appear today to discuss a bill that goes a long way towards ensuring that the products that consumers see on store shelves are safe.

First, I'd like to explain a little bit about CASLPA and what our 5,400 members do. CASLPA is the only national body that supports and represents the professional needs of speech-language pathologists, audiologists and supportive personnel. In doing so, we support our members to maximize the communication and hearing potential of the people of Canada. Prevention is a key role in this regard.

I think it is worth highlighting the work of audiologists. Audiologists are hearing health professionals who identify, diagnose and manage individuals with peripheral or central hearing loss, tinnitus and balance disorders.

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

CASLPA firmly believes that, with Bill C-6, the government is moving in the right direction to ensure that the products we have in our home are safe. It does so by placing an onus on manufacturers to ensure that their products are safe and giving government the power and capacity to make sure that this happens.

Putting the onus on industry to ensure product safety is a welcome change from the status quo and helps to encourage a culture of safety for those that make and sell goods to people in Canada; giving the Minister power to order safety tests on products and, when needed, mandatory recalls, ensures that the government is able to respond quickly when problems do arise. Doubling the number of inspectors, the eyes and ears of consumer safety legislation, increases the government's ability to anticipate and respond to consumer product issues.

In short, CASLPA firmly believes that C-6 is a step in the right direction for consumer product safety. But there are other steps to take, specifically as it relates to children's toys.

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) standards of 75 dB. Choking hazards and lead in toys may be more apparent dangers to the public. The danger of noisy toys are often trivialized or dismissed as just annoying to parents – but the danger these toys pose is very real — and can cause permanent hearing damage. 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. This is markedly higher than the 75 dB suggested by the WHO, and the International Standards Organization has recommended that close-to-the-ear toys not exceed 65 dB. As a contrast, in a workplace, exposure to 100 dB would only be considered safe for 15 minutes. And that is for adults; children, because of their smaller ear canals, are more susceptible to the effects of noise.

What's more, how government currently measures a toy's sound often underestimates its actual effect. As mentioned, currently sound is measured at arm's length; it is no secret that, during the routine course of play, children will hold toys substantially closer than that, increasing the toy's relative noise and its risk to permanently damage hearing.

Since government cannot mandate how children play with toys, current testing protocols must be revised to reflect actual play situations.

Through Bill 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 work 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, as is echoed in another important piece of legislation, bill C-357. It should also improve the method by which this level is measured. Under current 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 from noise exposure, it is important that government seize the opportunity of this legislation to include a safer noise standard for children's toys. CASLPA members have seen first-hand the hearing, speech and language implications that can arise from hearing loss due to unacceptable noise conditions.

Once again, I thank you for the opportunity to speak to you today about how we can improve the safety of children's toys. I look forward to your questions.