



Retail Nutrition Products: Foods, Dietary Supplements and Natural Health Products

A Joint Statement from Saskatchewan Dietitians Association – Dietitians of Canada – Saskatchewan College of Pharmacy Professionals

Saskatchewan Dietitians Association

The Saskatchewan Dietitians Association is a regulatory body dedicated to protecting the public by licensing competent Dietitians and setting and enforcing the standards of the dietetic profession. As the only regulated nutrition profession, licensed members can be identified by their use of the protected titles dietitian, registered dietitian (RD), professional dietitian (PDt).

Dietitians of Canada

Dietitians of Canada is the professional association for dietitians. As the voice of the profession, we strive for excellence in advancing health through food and nutrition.

Saskatchewan College of Pharmacy Professionals

The Saskatchewan College of Pharmacy Professionals regulates the profession of pharmacy, which includes pharmacists, pharmacy technicians and pharmacies, to provide safe, effective, patient-centered pharmacy care in Saskatchewan. Our vision is quality pharmacy care in Saskatchewan.

BACKGROUND

An increasing number of consumers are interested in using retail nutrition products for the prevention, treatment and management of chronic health conditions, weight management or general health and wellness. The marketplace includes a variety of products, many of which are regulated by Health Canada under the [Food and Drug Regulations](#) (FDR) or [Natural Health Products Regulations](#) (NHPR) in order to be sold for consumption (refer to **Appendix** for definitions). In addition to being available in community retail settings, these types of nutrition products may also be provided to clients in institutional settings. Although the safety of these products is somewhat regulated by federal agencies, their efficacy is not. As consumer interest and availability of retail nutrition products increases, it is the vision of Saskatchewan College of Pharmacy Professionals (SCPP), Saskatchewan Dietitians Association (SDA) and Dietitians of Canada (DC) that dietitians and pharmacy professionals, which include pharmacists, pharmacy technicians and pharmacies, collaborate in all settings whereby retail nutrition products may be provided or sold to clients in order to ensure client safety and safeguard from nutrition products with potentially misleading claims.

JOINT STATEMENT

Optimal client-centred care for those seeking information on retail nutrition products is best achieved through professional responsibility and collaboration of dietitians and pharmacy professionals.

Professional Responsibilities

As regulated health professionals, dietitians and pharmacy professionals must practice according to ethical and professional standards to ensure the health and safety of the public is protected. Moreover, the public have a right to expect dietitians and pharmacy professionals to be open and honest about the effectiveness, limitations and potential risks of retail nutrition products. Therefore, dietitians and pharmacy professionals must:

1. Seek, interpret and use an evidence-informed approach when providing client care.
2. Only provide services and recommend products that are supported by reliable, evidence-based and non-biased information and avoid any real or perceived conflict of interest in which his/her professional judgement could be compromised.
3. Ensure marketing and promotional materials are professional, accurate and based on best available evidence and must meet the professions' code of ethics and professional standards of practice.
4. If the retail nutrition products available in the pharmacy are unsafe or misleading, the pharmacist or dietitian has a duty to document and report the products to their respective regulatory organizations.
5. Show respect for other health professionals when working as part of interprofessional health care teams, recognizing the expertise of others and sharing information and planning collaboratively to ensure the patient is given timely and adequate care.

Furthermore, consistent with ethical obligations to advertise with integrity, Saskatchewan College of Pharmacy Professionals' bylaws dictate that advertising by pharmacists, pharmacy technicians and pharmacies must be accurate and supported by sufficient high-quality scientific evidence and must not mislead the public. Pharmacists or pharmacies should not promote or make claims for products from which the public may infer that the pharmacist/pharmacy endorses the product or attributes characteristics to it that are not supported by best available scientific evidence.

Pharmacy Professionals

As derived from [NAPRA Model Standards of Practice for Canadian Pharmacists](#), when recommending natural health products, pharmacists are expected to:

1. Be knowledgeable about natural health products and their safety profile, including approved uses, therapeutic claims, contraindications and side effects.
2. Have access to references from credible authorities to assist in decision making and educating and meeting the information needs of the patient.
3. Promote natural health products only for their approved uses that does not contradict or replace recognized drug therapy and do not cause patient harm.

These same principles apply to products regulated as "foods" under the provisions of the FDR and any other products sold for consumption by consumers. Under SPCP's Licensed Pharmacy Technicians Scope of Practice, licensed technicians cannot provide clinical services (point 2 & 3) or recommend certain retail nutrition products. However, they are still expected to comply with point 1.

Similarly, pharmacy professionals should consult with a dietitian or refer a client to a dietitian:

1. If the client is requesting food and nutrition information for the prevention, treatment or management of a chronic condition or weight management.
2. If the pharmacist or client is unsure if a retail nutrition product is appropriate for the client's overall health and wellness.

Pharmacy professionals can access a current list of dietitian services in Saskatchewan through the directory on the [Saskatchewan Dietitians Association](#) website. The [Dietitians of Canada](#) website also has a "Find a Dietitian" directory to find private practice dietitians in Saskatchewan. Private practice dietitians offer fee for service, which may be covered under some employee health insurance plans.

Dietitians

As per the [Integrated Competencies for Dietetic Education and Practice](#), dietitians who provide medical nutrition therapy through the application of the Nutrition Care Process for the purposes of disease prevention, treatment and management are expected to:

1. Be knowledgeable on how complementary and alternative nutrition therapies may influence medical nutrition therapy.
2. Comply with the code of ethics in ensuring patients receive timely and optimal care.
3. Apply a broad knowledge of pharmacology including:
 - a. drug classifications relevant to nutrition and their modes of action
 - b. common medication side effects and contradictions relevant to nutrition
 - c. drug-nutrient interaction
 - d. nutrients and nutraceuticals as pharmacological agents
 - e. natural health products.

Therefore, dietitians should consult with a pharmacy professional or refer a client to a pharmacy professional:

1. If there are potential contraindications with other medications the client is taking.

Dietitians can consult with pharmacists directly in Saskatchewan through [MedSask](#), a medication information service at the University of Saskatchewan that provides health care providers and the general public with timely access to current, relevant, evidence-based information on drug therapy. Pharmacy professionals can also be reached through the [Pharmacy or Pharmacist Register](#) on the Saskatchewan College of Pharmacy Professionals' website.

Opportunities for Collaboration

The use or consumption of retail nutrition products has the potential to impact nutrition status, interact with drug therapy and interfere with health and wellbeing. This provides an opportunity for dietitians and pharmacy professionals to collaborate and provide coordinated messaging to the consumer. Opportunities for collaboration between dietitians and pharmacy professionals arise under these circumstances:

1. The regulation or legal status of retail nutrition products requires clarification.
2. The classification of retail nutrition products is uncertain.
3. Their nutritional, therapeutic or health promotion value is uncertain.
4. Their impact on the patient's drug therapy needs to be ascertained.
5. The impact of drug therapy on their nutritional, therapeutic or health promotion value needs to be determined.

CONCLUSION

Dietitians and pharmacy professionals are highly qualified, regulated health professionals who provide credible, evidence-based expertise in their respective practice areas. With the growing interest in retail nutrition products, consumers must be able to rely on dietitians and pharmacy professionals for accurate, reliable information about these products that is free from bias and does not mislead or provide false claims. By committing to collaborate and practice according to ethical and professional standards, dietitians and pharmacy professionals can ensure the health and safety of the public will be maintained and the best care will be consistently provided to clients.

Approved: November 28, 2017

Appendix: Definitions of Retail Nutrition Products

Product	Definition	Reference
Products Regulated Under the Food and Drug Regulations		
Food	Any article manufactured, sold or represented for use as food or drink by man, chewing gum, and any ingredient that may be mixed with food for any purpose whatever.	Government of Canada. Food and Drugs Act. R.S.C., 1985, c. F-27
Drug	Any substance or mixture of substances manufactured, sold or represented for use in the diagnosis, treatment, mitigation or prevention of a disease, disorder or abnormal physical state, or its symptoms, in human beings or animals; restoring, correcting or modifying organic functions in human beings or animals; or disinfection in premises in which food is manufactured, prepared or kept.	Government of Canada. Food and Drugs Act. R.S.C., 1985, c. F-27
Supplemented Foods	<p>A pre-packaged product that is manufactured, sold or represented as a food, which contains added vitamins, minerals, amino acids, herbal or bioactive ingredients. These ingredients may perform a physiological role beyond the provision of nutritive requirements. Examples of supplemented foods include caffeinated energy drinks and some other beverages, beverage mixes and concentrates, some powders such as protein powders, some bars such as power bars and some types of confectionaries such as chewing gums.</p> <p>It is important to note that some supplemented foods were formerly authorized as Natural Health Products (NHPs) in accordance with the <i>Natural Health Products Regulations</i> (NHPR), not the FDR. However, in 2012, Health Canada transitioned supplemented foods from the NHP framework to the food regulatory framework. In the long-term, all supplemented foods will be required to comply with the regulatory requirements set out in the FDR for these types of foods. Click here for a complete list of supplemented food products with current Temporary Marketing Authorization Letters.</p>	Health Canada. Category Specific Guidance for Temporary Marketing Authorization: Supplemented Food
Nutritional Supplement	A food sold or represented as a supplement to a diet that may be inadequate in energy and essential nutrients.	Government of Canada. Food and Drug Regulations. Part B: Foods, Division 1, General B.01.001
Meal Replacement	A formulated food that, by itself, can replace one or more daily meals.	Government of Canada. Food and Drug Regulations. Part B: Foods, Division 1, General B.01.001

Foods for Special Dietary Use	Food that has been specially processed or formulated to meet the particular requirements of a person in whom a physical or physiological condition exists as a result of a disease, disorder or injury; or for whom a particular effect, including but not limited to weight loss, is to be obtained by a controlled intake of foods. Foods for Special Dietary Use may include a formulated liquid diet, a meal replacement, a nutritional supplement, a gluten-free food, a food represented for protein-restricted diets, a food represented for low amino acid diets or a food represented for use in a very low energy diet. For information about labelling requirements for foods for special dietary use, visit the Government of Canada website.	Government of Canada. Food and Drug Regulations. Part B: Foods, Division 24, Foods for Special Dietary Use B.24.001
Formulated Liquid Diet	A food that is sold for consumption in liquid form; and is sold or represented as a nutritionally complete diet for oral or tube feeding of a person in whom a physical or physiological condition exists as a result of a disease, disorder or injury.	Government of Canada. Food and Drug Regulations. Part B: Foods, Division 24, Foods for Special Dietary Use B.24.001
Meal Replacements, Nutritional Supplements, Prepackaged Meals and Foods Sold by Weight Reduction Clinics	Additional regulations and labelling requirements specified in the FDR must be met when meal replacements, nutritional supplements, prepackaged meals and foods are sold or advertised for use in a weight reduction diet.	Government of Canada. Food and Drug Regulations. Part B: Foods, Division 24, Meal Replacements, Nutritional Supplements, Prepackaged Meals and Foods sold by Weight Reduction Clinics B.24.200
Products Regulated Under the Natural Health Products Regulations		
Natural Health Products¹	Substances used in the prevention or treatment of an illness or condition, the reduction of health risks or the maintenance of good health. NHPs include: <ul style="list-style-type: none"> • Vitamins and minerals • Herbal remedies • Homeopathic medicines • Traditional medicines such as traditional Chinese medicines • Probiotics • Amino acids • Essential fatty acids 	Government of Canada. Natural Health Products Regulations Health Canada. About Natural Health Products

¹ From September-October 2016 and April-June 2017, Health Canada (Natural and Non-prescription Health Products Directorate) held consultations to gather comments on proposals for a new approach to regulating self-care products, which includes Natural Health Products. Under this new approach, labels would provide consumers with valuable information about the product including whether a claim on the product is based on scientific evidence, or a disclaimer if Health Canada has not approved the claim on the product. These new proposals will help ensure that companies cannot deceive Canadians into thinking an unproven claim is truthful. Health Canada has not yet announced the new regulations or a date as to when these new regulations will come into effect.

	<p>NHPs that have been licensed for sale in Canada will have an eight-digit Natural Product Number (NPN) or Homeopathic Medicine Number (DIN-HM) on the label. A NPN or DIN-HM means that the product has been authorized for sale in Canada and is safe and effective when used according to the instructions on the label.</p> <p>Consumers and health professionals should report adverse reactions (also known as side effects) of Natural Health Products to the Government of Canada.</p>	
Other Products/Terms Used in the Marketplace		
Functional Food	<p>The Bureau of Nutritional Sciences, of the Food Directorate of Health Canada, has proposed that a functional food is a food similar in appearance to, or may be, a conventional food, is consumed as part of a usual diet, and is demonstrated to have physiological benefits and/or reduce the risk of chronic disease beyond basic nutritional functions.</p> <p>There are currently no regulations dealing specifically with functional foods. All foods and drugs fall under the provisions of the FDR.</p>	<p>Health Canada. Policy Paper. Therapeutic Products Programme and the Food Directorate from the Health Protection Branch. Nutraceuticals/functional foods and health claims on foods</p>
Nutritional Aid	<p>The term “nutritional aid” is not formally defined by Health Canada nor does it appear under the FDR or NHPR. In the consumer retail environment, this term may be used to refer to a variety of products marketed for nutrition and health benefits. The term “nutritional ergogenic aid” is often used in the context of enhancing athletic performance.</p>	<p>Nutrition and Athletic Performance. Position of Dietitians of Canada, the Academy of Nutrition and Dietetics and the American College of Sports Medicine. 2016.</p>
Weight Loss Products	<p>The FDR includes a reference in Part B.24.200 to “Meal Replacements, Nutritional Supplements, Prepackaged Meals and Foods Sold by Weight Reduction Clinics”; however, there is no official definition or classification for “weight loss products”. Depending on their composition, format and dosage, weight loss products may be foods, drugs or NHPs and regulated under the FDR or NHPR, which means they must be labeled truthfully within the parameters set out in the applicable regulations. Weight loss products regulated under the FDR or NHPR may have an eight-digit Drug Identification Number (DIN), NPN or DIN-HM. For additional information on the safe use of health products for weight loss, visit the Government of Canada website.</p>	<p>Government of Canada. Food and Drug Regulations. Pat B: Foods, Division 24, Meal Replacements, Nutritional Supplements, Prepackaged Meals and Foods sold by Weight Reduction Clinics B.24.200.</p>