



CANADIAN ASSOCIATION
OF RETIRED PERSONS

CARP Submission to the Province of Ontario

Re: Consultation on Potential Changes to the Sale and Use of Over-the-Counter Hearing Aids in Ontario

**Submitted by CARP
May 22, 2026**

Introduction

CARP is a national, non-partisan advocacy organization representing older Canadians. CARP advocates for financial security, access to health care, protection from age discrimination, and public policies that support independence, dignity, safety, and quality of life as Canadians age.

CARP supports Ontario amending its regulatory framework to permit responsible access to Health Canada-licensed over-the-counter hearing-aid technologies for adults with perceived mild-to-moderate hearing loss. This reform should be carefully defined, consumer-protective, and integrated into Ontario's broader hearing-health system.

Ontario has an opportunity to modernize hearing-health access in a way that supports earlier intervention, preserves professional care, protects public supports, and aligns provincial rules with federally licensed technology.

CARP urges Ontario to move forward.

Recommendation

CARP recommends that Ontario amend the applicable legislation and regulations to allow Health Canada-licensed over-the-counter hearing-aid technologies to be sold, activated, and used in Ontario without a prescription for adults aged 18 and older with perceived mild-to-moderate hearing loss.

A responsible Ontario framework should:

- Maintain the existing prescription-based hearing-aid system.
- Protect the Assistive Devices Program (ADP).
- Preserve the role of audiologists, physicians, and professional hearing care.
- Support clear consumer information, red-flag guidance, and referral pathways.
- Recognize over-the-counter hearing-aid technology as one part of a broader hearing-health continuum.



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Hearing health is a significant aging issue. Statistics Canada has reported that hearing loss becomes increasingly common with age, with audiometrically measured hearing loss affecting 77% of Canadians aged 60 to 69 and 94% of Canadians aged 70 to 79. Statistics Canada has also found that many Canadians aged 40 to 79 are unaware they have hearing loss.

The consequences of unaddressed hearing loss extend well beyond difficulty hearing. The World Health Organization identifies effects on communication, cognition, social participation, loneliness, stigma, employment, education, and dementia risk when hearing loss remains unaddressed.

For older Ontarians, hearing health is closely connected to independence, safety, confidence, and participation in daily life. People who struggle to hear may withdraw from social settings, miss important information, become more dependent on family members, or delay seeking help because the pathway feels too expensive, too complicated, or too stigmatized.

Ontario should reduce unnecessary barriers to early hearing support. For many people, a professional assessment will remain the right first step. For others, a regulated over-the-counter option may help them recognize a hearing change, try appropriate support, and seek professional care when their needs are more complex.

Ontario's consultation recognizes a practical barrier in the current system. At present, hearing aids in Ontario are dispensed through a prescription-based framework involving regulated health professionals. As a result, devices and software features that may function as hearing aids cannot be made available to Ontarians without changes to provincial rules.

This creates a significant access gap. Health Canada has issued Class II medical device licences for Apple's Hearing Test Feature and Hearing Aid Feature. Health Canada's listing identifies those features as licensed medical devices, first issued on December 11, 2024.

Despite that federal licensing, Apple's Canadian feature-availability page states that regulatory restrictions currently prevent release of the Hearing Test and Hearing Aid features in Canada.

For consumers, the result is difficult to understand. A technology may be federally licensed, available in other jurisdictions, and designed for a defined adult population, yet remain inaccessible in Ontario because provincial rules have not been updated.

Ontario should address that gap.

Federal licensing requires provincial alignment

Medical device licensing and professional regulation operate through different levels of government. Health Canada licenses medical devices federally. Provinces regulate health



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professions and determine when professional involvement is required for access to particular health-related products or services.

That division of authority matters here. A federally licensed hearing-aid technology may still be unavailable to Canadians if provincial rules prevent its sale, activation, or use without a prescription.

For app-enabled and firmware-enabled technologies, this problem becomes more acute. Mobile health features do not operate neatly within provincial borders. Suppliers may be unable to release a feature province by province in a way that is practical, reliable, or understandable to consumers. If Canada lacks sufficient provincial alignment, Canadians in every province may lose access even where local rules are less restrictive.

Ontario is therefore central to the national picture. A clear Ontario framework would help establish the conditions for broader Canadian access and would encourage other provinces to align their rules with Health Canada licensing.

Ontario should define the eligible population clearly.

CARP supports over-the-counter hearing-aid access for adults aged 18 and older with perceived mild-to-moderate hearing loss. This may include people who notice early signs of difficulty hearing conversation in groups, following speech in noisy places, hearing on the phone, understanding family members, or keeping up in social settings.

The framework should be designed for people who can use the technology safely, understand its limits, and seek help when results are unclear or symptoms suggest a more serious issue. It should also recognize that many older adults may use these tools with support from a family member, caregiver, retailer, audiologist, physician, or other professional.

Apple's own materials describe its Hearing Aid feature as intended for people 18 years or older with perceived mild-to-moderate hearing loss. The feature can use either results from Apple's Hearing Test or an audiogram from a hearing-health professional.

This is the appropriate policy for over-the-counter access: defined, adult, mild-to-moderate, and supported by clear information.

Situations requiring professional care

Ontario's framework should also be explicit about circumstances where self-directed over-the-counter access is not appropriate.

Professional assessment should remain the clear pathway for:

- Children and youth under 18.



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- Severe or profound hearing loss.
- Sudden hearing loss.
- One-sided hearing changes.
- Ear pain, drainage, dizziness, or suspected blockage.
- Unusual ear symptoms or medical red flags.
- Tinnitus, balance concerns, or other complex auditory issues.
- Individuals who require diagnostic testing, professionally fitted devices, or ongoing clinical management.

This distinction protects consumers and supports the role of professional care. It also gives manufacturers, retailers, and health professionals clear expectations about how these products should be presented.

Over-the-counter technology within the hearing-health continuum

CARP supports a modern hearing-health continuum that includes self-directed tools for appropriate adults, professional assessment, prescribed hearing aids, physicians, audiologists, public funding programs, and clinical care when needed.

Over-the-counter hearing-aid technology can serve as an earlier and lower-barrier point of entry for some adults. It may help people acknowledge hearing changes sooner, reduce stigma, and encourage further engagement with hearing health.

This is particularly important because many people delay hearing care for years. Some do not perceive their hearing loss. Others avoid formal care because of cost, inconvenience, stigma, or uncertainty about whether their hearing is “bad enough” to seek help.

A regulated over-the-counter option can help close that gap. A person who takes a hearing test, sees a hearing profile, or tries an appropriate device may become more aware of their hearing needs and more likely to pursue professional care where necessary.

Professional care remains essential. The purpose of this reform is to expand appropriate entry points into hearing support, not to narrow the role of audiologists, physicians, or prescribed devices.

Response to professional-care concerns

CARP recognizes the concerns raised by professional audiology organizations, including OAPAC. Those concerns deserve serious attention.

Audiologists play an essential role in identifying, assessing, and managing hearing loss, tinnitus, balance disorders, and other auditory conditions. Many people will require diagnostic testing, professional fitting, clinical judgment, medical referral, or ongoing support. Over-the-counter



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technology should be regulated in a way that strengthens, rather than undermines, those pathways.

The concerns raised by professionals point to the need for a careful regulatory framework. Ontario should support safeguards that ensure consumers understand the limits of over-the-counter devices and know when professional care is required.

Those safeguards should include:

- Clear age eligibility.
- Clear intended-use guidance.
- Accessible consumer education.
- Red-flag guidance for symptoms requiring professional assessment.
- Information about what to do if the device does not help.
- Referral pathways to audiologists, physicians, and other appropriate professionals.
- Reasonable support, return, or trial options where applicable.
- No weakening of ADP or prescribed hearing-aid coverage.

A well-designed framework can respond to professional concerns while still allowing appropriate adults to access federally licensed technology.

Protecting ADP and the professional pathway

CARP strongly supports maintaining Ontario's existing professional hearing-aid system and public support through the Assistive Devices Program.

Ontario's policy change should not reduce access to prescribed hearing aids. It should not move people with complex hearing needs into an unsuitable consumer pathway. It should not reduce professional assessment for those who need it. It should not weaken public coverage for eligible Ontarians.

Public reporting on Ontario's consultation indicates that the proposed changes would not affect the current model of care and that prescribed hearing aids would continue to be covered under ADP. CARP supports that commitment and urges Ontario to make it explicit in any final regulatory package.

Over-the-counter devices should expand consumer options. They should not become a substitute for ADP-supported devices or a reason to reduce public responsibility for hearing care.

Recommended Ontario framework

CARP recommends that Ontario implement a framework with the following elements.



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1. Create a clear legal exception for over-the-counter hearing aids

Ontario should amend the Regulated Health Professions Act and any related regulations as required to permit a defined class of over-the-counter hearing aids to be sold, activated, and used without a prescription by adults 18 and older with perceived mild-to-moderate hearing loss.

CASLPO's task force has identified sections 27 and 31 of the RHPA as relevant areas for amendment and has recommended that Ontario consider a legal exception for over-the-counter hearing aids for a defined adult population.

2. Define the device categories

Ontario should create clear definitions for:

- Hearing aid.
- Prescription hearing aid.
- Over-the-counter hearing aid.
- Personal sound amplification product, or an equivalent non-medical category.

Clear definitions will reduce confusion for consumers, retailers, manufacturers, and professionals. They will also help prevent inappropriate marketing or use.

3. Limit eligibility

Over-the-counter access should apply to adults 18 and older with perceived mild-to-moderate hearing loss and no red-flag symptoms. The framework should support clear information about situations requiring professional assessment.

4. Support clear consumer information

Ontario should support clear, accessible consumer information about the intended use of over-the-counter hearing-aid technology, including age eligibility, mild-to-moderate hearing loss, the limits of self-directed tools, and circumstances where professional assessment is recommended.

This information can be provided through manufacturer materials, public guidance, professional-care pathways, and consumer support resources. Ontario should avoid operational requirements that are impractical for app-based technologies or that could unnecessarily delay access to federally licensed products.

5. Support professional integration

Audiologists and other regulated hearing professionals should be able to advise on, recommend, provide, support, and troubleshoot over-the-counter hearing-aid technologies when



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appropriate. Ontario should treat OTC technology as part of the hearing-health continuum and should ensure that professional advice remains available to consumers who want or need it.

6. Protect ADP

Ontario should clearly state that access to over-the-counter hearing-aid technology does not affect eligibility for prescribed hearing aids under ADP. The province should also confirm that OTC devices are not a replacement for ADP-supported prescribed devices.

7. Set manufacturer and retailer responsibilities

Retailers and manufacturers should provide accessible customer support, consumer guidance, and referral information for professional care where appropriate.

8. Coordinate nationally

Ontario should work with Health Canada and other provinces to harmonize definitions and access rules. Alberta appears more permissive, while Ontario, British Columbia, Quebec, and other provinces require clarity or reform to avoid a fragmented system.

National coordination is especially important for mobile, app-enabled technologies. Canadians should not be denied access because provincial rules were designed for an earlier generation of medical devices.

Ontario should act now

Ontario should act before more Canadians encounter avoidable barriers to hearing support.

Many Ontarians who hear well today will experience hearing changes in the years ahead. They should inherit a system that offers professional care, prescribed devices, public supports, and responsible over-the-counter options.

This is how effective advocacy works. Older Canadians often push for change when they experience a barrier directly, but the benefits extend well beyond the original advocates. Public pensions, income supports, drug benefits, accessibility measures, and protections against age discrimination all reflect that principle.

Hearing health belongs in the same category. The system Ontario builds now will affect people living with hearing loss today and many more who will need support in the future.

Conclusion



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CARP supports Ontario allowing responsible over-the-counter access to Health Canada-licensed hearing-aid technologies for adults aged 18 and older with perceived mild-to-moderate hearing loss.

Ontario should proceed with clear eligibility rules, practical consumer guidance, professional referral pathways, and explicit protection for ADP and prescribed hearing-aid coverage.

This reform would give Ontarians more ways to act earlier on hearing health while preserving the professional and public supports that remain essential.

CARP urges Ontario to modernize its framework and help create the conditions for coordinated national access to safe, regulated hearing-health technology.

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