Health Canada’s Product Safety Pledge: A model product safety framework for Consumer Products and Cosmetics

September 03, 2025

On August 25, 2025, Health Canada released its first annual report (the Report) summarizing anonymized self assessment data received in respect of the reporting period beginning September 29, 2023, and ending September 28, 2024, from signatories to the Canadian Product Safety Pledge for Consumer Products and Cosmetics (the Pledge). The Report aggregates information from Pledge signatories regarding the outcomes and effectiveness of their product safety initiatives and their adherence to their commitments under the Pledge.

The Pledge

In September 2023, Health Canada released the Pledge as part of its Consumer Product Safety Program (the Program). The Pledge is a voluntary commitment undertaken by online marketplaces to strengthen and improve product safety. Signatories pledged to abide by 14 commitments that are focused into four themes:

1. detecting and preventing the sale of unsafe products;
2. co-operating with Health Canada;
3. raising product safety awareness amongst sellers; and
4. empowering consumers on product safety issues.

Broadly speaking, these commitments encourage signatories to: (i) establish systems that list recalled, prohibited, or non-compliant products, (ii) implement mechanisms to review third-party sellers and prevent the listing of unsafe products online, (iii) conduct internal audits for compliance, (iv) evaluate consumer-Reported product issues, and (v) regularly assess new ways to improve on their commitments under the Pledge. This voluntary product safety framework entrenches key metrics that encourage responsiveness, including removing products within two business days of receiving requests from Health Canada, providing Health Canada with information regarding third parties selling recalled, prohibited, or non-compliant products, and assisting Health Canada in contacting such third-party sellers.

The report

The Report summarizes the signatories' use of various mechanisms and specific actions focused on furthering each of their 14 commitments. To facilitate sellers' compliance to Canadian regulations, signatories:

- implemented automated processes to identify global recalls to effect removal of such products from its marketplace;
- used artificial intelligence tools to filter and identify recalled products and to prevent their future listing;
- created safety and recall alert pages, systems to validate bilingual labels, and improved monitoring and blocking tools;
- made available product safety guidelines and improved communication tools; and
- enhanced consumer autonomy by making product listings more accurate and accessible, developing consumer reporting mechanisms and providing recall notices directly to consumers.

The Report also highlights the use of screening mechanisms on third-party sellers to identify and remove accounts associated with previously banned third-party sellers.

The Report identifies that there are still some areas for improvement in detecting and preventing the sale of recalled, prohibited, or non-compliant products, noting that some third-party sellers circumvented online marketplace screening measures by changing their product names. The Report indicates that Health Canada will continue to work collaboratively with online marketplaces to continue strengthening protections for consumers.

Future impact

The Report offers product safety leaders and retailers a framework for assessing internal compliance mechanisms against identified product safety key performance indicators. Of note, the Report highlights the Health Canada's encouragement as to the use of artificial intelligence to achieve the principles and commitments under Pledge. Retailers, particularly those who enable the third parties to sell their products through their online platforms, should consider evaluating their current practices in light of these insights to ensure alignment with Health Canada's evolving expectations of best practices.

By

Edona C. Vila, Benjamin Fuhrmann, Alexandra Hollis

Expertise

Health Law, Products Law, Health Care & Life Sciences

BLG | Canada's Law Firm

As the largest, truly full-service Canadian law firm, Borden Ladner Gervais LLP (BLG) delivers practical legal advice for domestic and international clients across more practices and industries than any Canadian firm. With over 800 lawyers, intellectual property agents and other professionals, BLG serves the legal needs of businesses and institutions across Canada and beyond – from M&A and capital markets, to disputes, financing, and trademark & patent registration.

blg.com

BLG Offices

Calgary

Centennial Place, East Tower
520 3rd Avenue S.W.
Calgary, AB, Canada
T2P 0R3

T 403.232.9500
F 403.266.1395

Ottawa

World Exchange Plaza
100 Queen Street
Ottawa, ON, Canada
K1P 1J9

T 613.237.5160
F 613.230.8842

Vancouver

1200 Waterfront Centre
200 Burrard Street
Vancouver, BC, Canada
V7X 1T2

T 604.687.5744
F 604.687.1415

Montréal

1000 De La Gauchetière Street West
Suite 900
Montréal, QC, Canada
H3B 5H4

T 514.954.2555
F 514.879.9015

Toronto

Bay Adelaide Centre, East Tower
22 Adelaide Street West
Toronto, ON, Canada
M5H 4E3

T 416.367.6000
F 416.367.6749

The information contained herein is of a general nature and is not intended to constitute legal advice, a complete statement of the law, or an opinion on any subject. No one should act upon it or refrain from acting without a thorough examination of the law after the facts of a specific situation are considered. You are urged to consult your legal adviser in cases of specific questions or concerns. BLG does not warrant or guarantee the accuracy, currency or completeness of this publication. No part of this publication may be reproduced without prior written permission of Borden Ladner Gervais LLP. If this publication was sent to you by BLG and you do not wish to receive further publications from BLG, you may ask to remove your contact information from our mailing lists by emailing unsubscribe@blg.com or manage your subscription preferences at blg.com/MyPreferences. If you feel you have received this message in error please contact communications@blg.com. BLG's privacy policy for publications may be found at blg.com/en/privacy.

© 2026 Borden Ladner Gervais LLP. Borden Ladner Gervais LLP is an Ontario Limited Liability Partnership.