

PART V

SUBMISSION GUIDELINES

FOR

NUTRITION PRODUCTS

Nutrition products are not considered drug products. Although a submission for a nutrition product undergoes a similar review process as a drug product, the manufacturer must satisfy a different set of requirements to be considered for reimbursement according to the Maximum Allowable Reimbursement (MAR) mechanism and pricing schedule. In the case of nutrition products, a Drug Quality and Therapeutics Committee (DQTC) nutrition consultant first reviews the complete submission. As with drug products, the DQTC as a whole is asked to make a final recommendation to the Ministry regarding the reimbursement of nutrition products. Please refer to the Formulary/CDI for more information on MAR and to Part II: Drug Submission Review Process for more detail on the review process.

Please note that a nutrition product will not be reimbursed under the Ontario Drug Benefit program if:

- the product is advertised in Ontario to the public; or
- the distributor is not located in Canada and relies on a direct sales network; or
- the product is intended for the following uses:
 - prescribed weight loss in the treatment of obesity
 - food allergies
 - body building
 - voluntary meal replacement
 - nutritional supplement
 - convenience
 - use as a replacement for breast feeding for infants with normal gastrointestinal absorptive function.

Submission Requirements

A manufacturer may satisfy the submission requirements by submitting **two copies** of the following:

- a completed Nutrition Product Summary Sheet
- a completed Nutrition Product Work Sheet
- clinical evidence
- product description and nutrient information
- complete pricing information

The submission will be deemed incomplete if any of the above are missing without an adequate explanation.

Points of Clarification

Nutrition Product Worksheet

The Nutrition Product Worksheet was developed based on the guidelines that DQTC reviewers use during their evaluation. It was designed to help manufacturers prepare submissions that are easy to review and ensure submissions proactively address the DQTC's usual questions.

- documentation with respect to complete ingredients, nutrient analysis of the product and the quantitative formula, including support for the classification of the nutrition product (e.g., polymeric, semi-elemental or elemental, or modular product); and
- daily volume to meet Recommended Nutrient Intake (RNI); and
- a sample of the label of the product as it is intended to be sold in Canada; and
- clearly indicate the following two prices: (1) the lowest price per unit sold to pharmacies and wholesalers (i.e., direct price without the mark up); and (2) the price including the wholesale mark up (and indicate percentage), for each package size of the product that is offered for sale, cost per 1000 kcal and cost per unit (mL or g); and
- justification for price listings above the maximum allowable amount for the product category; and
- documentation with respect to the indications of use; and
- **product specific** clinical studies and, if available, other clinical evidence of the product's therapeutic effectiveness or efficacy and of the product's safety, including any information that relates to adverse reactions. Comparative studies evaluating the product's therapeutic effectiveness or efficacy and the product's safety to that of other products or treatments is of particular interest.; and
- evidence demonstrating the benefit of the product in relation to the cost of the product and to any alternative products or treatments, if available.

Submissions that do not contain the required information will be deemed incomplete and will not proceed further in the review process.

Note that the maximum allowable markup for nutritional products is identical to that prescribed for the purposes of paragraph 3 of subsection 6(1) of the *Ontario Drug Benefit Act*. Refer to Part II of the Formulary for more information.

A manufacturer must inform the Ministry of changes such as major formulation changes, changes in classification under the *Food and Drug Act*, changes in the ownership of the manufacturer, changes in product name, and changes in advertising policy. For a major change in formulation, the manufacturer should submit:

- old and new quantitative formula and nutrient formulation with the differences highlighted; and
- evidence that changes are not significant enough to potentially alter clinical response or safety.

NUTRITION PRODUCT SUMMARY SHEET

Date _____

Product Information	
Product Name/Strength/dosage Form	
Name & Address of Manufacturer and/or Canadian distributor	

1. Submission
 - New Product
 - Notice of Change

2. Does this product comply with Food and Drug Regulations? Yes No

3. Have you indicated the product's classification under the Food and Drug Regulations? Yes No

4. Have you indicated the category in the Ontario Drug Benefit Formulary/Comparative Drug Index sought? Yes No

5. Is this product advertised or planned to be advertised to the public in Ontario? Yes No

6. Have you summarized submitted clinical documentation in the specified table? Yes No

7. Have you completed the nutrient analysis table? Yes No

8. Have you submitted the required pricing information? Yes No

9. Administrative Issues
 - Are two complete sets of the submission provided? Yes No
 - Is the submission well organised, tabbed and indexed according to the relevant section of the requirements? Yes No
 - Is a table of contents included in the submission? Yes No

NUTRITION PRODUCT WORK SHEET

Date _____

Product Information	
Product Name/Strength/Dosage Form	
Name & Address of Manufacturer and/or Canadian distributor	

Please answer the following questions and complete the table below.

1. How is the product classified under the federal *Food and Drug Regulations*?

Formulated liquid diet	<input type="checkbox"/>
Meal replacement	<input type="checkbox"/>
Human milk substitute/infant formula	<input type="checkbox"/>
Unstandardized food	<input type="checkbox"/>
Other	<input type="checkbox"/>
Specify _____	<input type="checkbox"/>

2. Under which Nutrition Product category in the Ontario Drug Benefit Formulary should the product be considered for listing?

A. Complete Polymeric	
(1) Lactose Free	<input type="checkbox"/>
(2) Lactose Containing	<input type="checkbox"/>
(3) Fibre Containing	<input type="checkbox"/>
(4) High Nitrogen	<input type="checkbox"/>
B. Incomplete Polymeric	<input type="checkbox"/>
C. Modular	
(1) Protein	<input type="checkbox"/>
(2) Carbohydrate	<input type="checkbox"/>
(3) Fat	<input type="checkbox"/>
D. Chemically defined formula	<input type="checkbox"/>
E. Pediatric Formula - Complete Polymeric	
(1) Lactose Free	<input type="checkbox"/>
(2) Fibre Containing	<input type="checkbox"/>
F. Pediatric Formula - Incomplete Polymeric	<input type="checkbox"/>
G. Pediatric Formula - Chemically Defined	
(1) Oligomeric (Semi-Elemental)	<input type="checkbox"/>
(2) Monomeric (Elemental)	<input type="checkbox"/>
H. Pediatric Formula - Others	<input type="checkbox"/>

8. Nutrient analysis:

Nutrient Analysis Table

A. Complete column as indicated

Protein Source	Recommended volume intake for target population (mL)
Fat Source	Amount in recommended volume
Carbohydrate Source	Carbohydrate g
Fibre Source (if applicable)	Dietary Fibre g
Calorie:nitrogen ratio	Total Fat g
Non-protein Calorie:nitrogen ratio	Cholesterol g
Osmolality (mOsm/ kg water)	Polyunsaturated g
Osmolarity (mOsm/ litre)	Monounsaturated g
Water (%)	Fatty acids: Linoleic acid g
Renal Solute load (mOsm/litre)	Linolenic acid g
Energy density (kJ/mL)	Energy density (kcal/ mL)

B. Complete columns as indicated

	Amount in Recommended volume
Protein	% total energy
Carbohydrate	% total energy
Total Fat	% total energy
Saturated Fat	% total energy
PUFA n-6	% total energy
PUFA n-3	% total energy
PUFA n-6/n-3	ratio

B. (Continued from previous page) Complete columns as indicated

	Amount in recommended volume
Energy	kJ
	Kcal
Protein	g
Vitamin A	RE
Vitamin D	mcg
Vitamin E	mg
Vitamin K	mcg
Vitamin C	mg
Thiamine	mg
Riboflavin	mg
Niacin	NE
Vitamin B6	mg or mg/g protein
Vitamin B12	mcg
Folate	mcg
Pantothenic acid	mg
Biotin	mcg
Choline	mg
Calcium	mg
Phosphorus	mg
Magnesium	mg
Iron	mg
Zinc	mg
Copper	mg
Iodine	mcg
Manganese	mg
Selenium	mcg
Chromium	mcg
Molybdenum	mcg
Silicon	mcg
Lithium	mcg
Boron	mcg
Nickel	mcg
Vanadium	mcg
Arsenic	mcg
Fluoride	mg
Sodium	mg
	mmol
Potassium	mg
	mmol
Chloride	mg
	mmol

C. Complete amino acid section for nutrition products in Chemically Defined Category, Pediatric Category and nutrition products used for specific disease organ states where amino acid composition is clinically significant,

Amino Acids	Amount in recommended volume
Histidine	mg/g
Isoleucine	mg/g
Leucine	mg/g
Lysine	mg/g
Methionine + Cystine	mg/g
Phenylalanine + Tyrosine	mg/g
Threonine	mg/g
Tryptophan	mg/g
Valine	mg/g
Taurine	mg/g
Carnitine	mg/g

D. Other Nutrients (as needed)

Describe	Specify amount and units in recommended volume

Attachment 1

DEFINITIONS OF CATEGORIES OF NUTRITION PRODUCTS

The following definitions for categories of nutrition products in the Formulary are general guidelines for determining the appropriate category for a nutrition product.

A. Complete Polymeric

- These nutrition products are solutions containing macro-nutrients in the form of isolates of intact protein (e.g. calcium and sodium, or calcium and potassium caseinates; soy protein isolates), triglycerides, and carbohydrate polymers, which can be used orally or through a tube, and provide complete nutrition.

1. Lactose Free	Lactose free
2. Lactose Containing	Contains lactose
3. Fibre Containing	Lactose free Added fibre or naturally occurring fibre
4. High Nitrogen	Lactose free Protein approximately 18% or greater of total calories

B. Incomplete Polymeric

- These are nutrition products containing macro and/or micronutrients, below Health Canada's RNI which may be used in conjunction with polymeric products.

C. Modular

- These are single macro-nutrient products that are used in combination with another nutrition product for sole source nutrition or to increase the concentration of the macro-nutrient.

1. Protein	Only contains protein
2. Carbohydrate	Only contains carbohydrate
3. Fat	Only contains fat

D. Chemically Defined Formula

Oligomeric Solutions (Other names: Semi-elemental; Chemically Defined)	Solutions containing peptides and amino acids No lactose or minimal lactose No fibre
Monomeric Solutions (Other names: Elemental; Chemically Defined)	Solutions containing amino acids as the protein source No lactose No fibre

E. Pediatric Formula – Complete Polymeric

- These nutrition products are solutions that are specifically adapted to meet the specific nutritional requirements of pediatric patients for growth and development, and considering a variety of disease states. They contain macro-nutrients in the form of isolates of intact protein (e.g. calcium and sodium, or calcium and potassium caseinates; soy protein isolates), triglycerides, and carbohydrate polymers, which can be used orally or through a tube, and provide complete nutrition.

1. Lactose Free	Lactose free
2. Fibre Containing	Lactose free Added fibre or naturally occurring fibre

F. Pediatric Formula -- Incomplete Polymeric

- These are nutrition products containing macro and/or micronutrients, below Health Canada's RNI which may be used in conjunction with polymeric products.

G. Pediatric Formula -- Chemically Defined

Oligomeric Solutions (Other names: Semi-elemental; Chemically Defined)	Solutions containing peptides and amino acids No lactose or minimal lactose No fibre
Monomeric Solutions (Other names: Elemental; Chemically Defined)	Solutions containing amino acids as the protein source No lactose No fibre

H. Pediatric Formula -- Others