

November 10th, 2023

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Re: Submission to inform the second legislative review of the *Tobacco and Vaping Products Act (TVPA)*

To Whom it May Concern,

On behalf of the Middlesex-London Health Unit and Ontario's Southwest Tobacco Control Area Network (SWTCAN), please accept the following feedback attached as an Appendix to this letter. The SWTCAN represents seven Ontario public health units, including Public Health Grey Bruce, Huron Perth Public Health, Southwestern Public Health, Chatham-Kent Public Health, Lambton Public Health, Windsor-Essex County Health Unit, and the Middlesex-London Health Unit. The SWTCAN endorses the recommendations proposed by Ontario's Central East Tobacco Control Area Network (CETCAN), and request that this feedback be used to inform revisions to the *Tobacco and Vaping Products Act (TVPA)*.

The SWTCAN appreciates the opportunity to provide feedback on the *TVPA* and supports the implementation of policy levers that further protect Canadians from the harms associated with commercial tobacco product use:

- Implementation of a policy similar to New Zealand's "Smoke-Free Generation" policy which prohibits the sale of commercial tobacco products to anyone born after 2008 and lowers the level of nicotine in cigarettes to "non-addictive levels."
- Implementation of vaping policies to decrease appeal to youth such as increased taxation and bans on all flavors including mint and menthol.
- Increase funding for smoking cessation interventions such as fully funded pharmacological cessation aids like nicotine replacement therapy.
- Addressing inducements to tobacco use such as smoke and vape-free movies, closer monitoring and enforcement of online sales and advertising of tobacco and vapor products, and increased reporting requirements imposed on tobacco companies regarding sales data, research, and development.
- Engaging with Indigenous populations, taking a community-centered approach to explore the impact of intergenerational trauma intertwined with a culture of accepting commercial tobacco use.
- Enhancing compliance and enforcement support, including dedicated efforts to curb illegal online sales and promotion.

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Commercial tobacco remains one of the most addictive substances in the world. Within Canada alone, there are nearly 3.2 million commercial tobacco product users, and of that population, 264,000 of those people are 15-24 years of age (Health Canada, 2020). Between 2015 and 2017, the smoking prevalence rate for people aged 20 years and older in Middlesex-London was approximately 18 percent. Annually, it is estimated that smoking is attributable to roughly 600 deaths per year in the Middlesex-London region (Ontario Health and Public Health Ontario, 2023).

The Middlesex-London Health Unit and the SWTCAN remain committed to prevent youth initiation of commercial tobacco and vapor product use, to protect people from exposure to second-hand smoke and vapor, and to encourage people to quit. We look forward to working with our partners at the local, provincial, and federal levels to help support the implementation of programs and policies to reduce the burden of health harms related to commercial tobacco product use.

Sincerely,

A handwritten signature in black ink that reads 'Alexander T. Summers'.

Dr. Alexander Summers, MD, MPH, CCFP, FRCPC
Medical Officer of Health

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October 27, 2023

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To Whom it May Concern,

Re: Consultations to inform the second legislative review of the *Tobacco and Vaping Products Act* (TVPA).

On behalf of the Simcoe Muskoka District Health Unit and Ontario's Central East Tobacco Control Area Network (CETCAN) please accept the following feedback to the TVPA in addressing commercial tobacco¹ use in Canada. The CETCAN represents six Ontario public health units (Durham Region Health Department; Haliburton, Kawartha, Pine Ridge District Health Unit; Peel Public Health; Peterborough Public Health; Simcoe Muskoka District Health Unit and York Region Public Health) and is committed to reducing the health impacts of tobacco and nicotine use on Canadians. As such, we appreciate the opportunity to lend support and provide feedback on the TVPA.

Canada's Tobacco Landscape

While much progress has been made in de-normalizing cigarette smoking and protecting the population from the harms of tobacco use through policy efforts, the CETCAN recommends that additional policy levers be considered to further protect Canadians from the harms of tobacco.

Smoke-Free Generation Policy

Much like Canada, New Zealand has the goal of a less than 5% smoking rate amongst its population. To this end, they have implemented their Smoke-Free Generation policy which includes the following tenets that we call on the Federal Government to consider implementing:

1. Limiting the amount of nicotine in cigarettes to non-addictive levels.
2. Reducing the number of retailers allowed to sell cigarettes.
3. A ban on anyone born after 2008 from purchasing cigarettes ([Health New Zealand, 2023](#)).

¹ References to tobacco refer to commercial tobacco products and not traditional and/or sacred tobacco used for ceremonial purposes by First Nation, Metis, and Inuit communities.

We call on the Federal Government to implement a similar smoke-free generation policy to phase out tobacco use to protect youth from the harmful effects of smoking.

Strengthening Vaping Policies to Prevent Youth from Smoking

Research has demonstrated that youth who vape may go on to smoke cigarettes ([Hair et al., 2021](#)). In Ontario approximately 5% of youth smoke cigarettes while 23% have vaped in the last year ([Ontario Student Drug Use and Health Survey, 2021](#)). Youth obtain vapes from friends (social supply) but also directly through retailers ([Braak et al., 2020](#)). Flavoured vapes appeal to youth as they are visually attractive and palatable ([Chaffee et al., 2023](#)). Some vape products are priced to make them financially accessible to youth ([Physicians for a Smoke-Free Canada, 2023](#)). Nicotine levels in a single e-liquid cartridge are, by law in Canada, not to exceed 20 mg/mL which is the equivalent of one pack of cigarettes ([Government of Canada, 2021](#)). With high levels of nicotine found in vapes, youth can become addicted quickly. This addiction may lead to smoking cigarettes ([Hair et al., 2021](#)). We call on the Federal Government to implement the following policies to make it more difficult and less appealing for youth to vape:

1. Increase taxation on vaping products to make the cost of vaping products less accessible to youth.
2. Ban all flavoured vaping products including mint and menthol because youth consider the flavour of vaping products to be the most important factor when trying e-cigarettes and initiation is more likely to occur with fruit, sweet and menthol flavoured products ([Zare et al., 2018](#)). Additionally, when non-traditional flavours are restricted and mint and menthol remain on the market, young people shift their purchasing and consumption to preferences toward mint and menthol flavour ([Diaz et al., 2020](#)).
3. Implement plain and standardized packaging requirements on e-cigarettes to bring them into alignment with the 2019 federal Tobacco Products Appearance, Packaging and Labelling Regulations that standardized the appearance of tobacco packages and products to make them less appealing, particularly to youth and young adults ([Government of Canada, 2023](#)).
4. Make access to vaping products by prescription only so that their primary use is as a cessation aid for those who want to quit smoking similar to the policy Australia has implemented ([Australian Government Department of Health and Aged Care, n.d.](#)).

Increased Funding for Smoking Cessation Interventions

Access to cost-free smoking cessation services across Canada are comprised of a patchwork of programs that can be difficult to access. They often do not provide a combination of cost-free pharmacotherapy plus counselling which, when combined, have been shown to increase the odds of quitting over either intervention alone ([Hartmann-Boyce, Chepkin, Ye, Bullen & Lancaster, 2018](#)). Additionally, because tobacco use is a chronic, relapsing disorder, these interventions should be fully funded as much as the individual requires it, as many times as they need it, for as long as required ([Selby & Zawertailo, 2022](#)). The cost of smoking cessation aids such as nicotine replacement therapy and counselling can be prohibitive to individuals, particularly those most disproportionately affected by tobacco use. We call on the Federal Government to implement the following intervention to increase access to smoking cessation supports:

- Fully fund pharmacological cessation aids such as nicotine replacement therapy, varenicline and bupropion without limitations so that individuals may access these medications cost-free as many times as they need them for as long as they require them to obtain and sustain abstinence from tobacco.

Addressing Inducements to Tobacco Use

Current federal tobacco control legislation encompassed by the TVPA has made it less likely for youth to be exposed to tobacco-related advertisements including plain packaging legislation that came into effect in 2019. However, further interventions should be considered.

Smoke and Vape-Free Movies

The behaviour of smoking and vaping in movies is still a topic that could be addressed. Research in North America examining the prevalence of smoking in movies and its impact on youth smoking indicates a causal relationship. The US National Cancer Institute reviewed this evidence in 2008 summarizing: “The total weight of evidence from cross-sectional, longitudinal and experimental studies indicates a causal relationship between exposure to smoking in movies and youth smoking initiation” (NCI, 2008). The film rating system is no longer an approach that is effective in preventing youth from seeing smoking and vaping in films and other media content. Online content is accessible 24/7 with no restrictions imposed by criteria such as film ratings. For this reason, collaboration with the content creators needs to take place with consideration of removing all portrayals of smoking and vaping as a behaviour, even in films that depict time periods where smoking was prevalent. We call on the Federal Government to enact legislation that would provide enhancement to the advertising and promotion in media sections of the TVPA that define advertising with a broader reach and includes smoking and vaping in movies and television series that are streamed and/or available on television.

Online Sales of Tobacco and Vaping Products

Closer monitoring of online sales, advertising and retail sales for both tobacco and vaping products is required. There are a number of tobacco and vaping retailers who sell products exclusively online and conduct online sales as an extension of their brick-and-mortar retail locations. Ensuring that youth do not access this online content is as important as restricting promotion at a retail store. For these reasons the CETCAN calls on the Federal Government to enact stricter policies around the online sale of tobacco and vaping products combined with consistent enforcement to address the online sales medium. Additionally, online platforms that sell tobacco and vaping products could be made to have a mandatory health warning about the harms of tobacco and vaping on their website (PHO, 2023).

Monitoring the Tobacco Market

Increased Reporting Requirements

We applaud the Federal Government for the current Tobacco Reporting Regulations (TRR) reporting requirements imposed on tobacco companies regarding sales data, research and development ([Health Canada, 2023](#)). We call for the TRR to impose the same reporting requirements for those products not currently part of this mandate including waterpipe, chew tobacco, gutka, heated tobacco products (i.e., “heat not burn”) and tobacco blunt wraps. Additionally, many vaping companies have been purchased by tobacco companies resulting in profits from the sale of vaping products. We therefore call on the Federal Government to also impose the same sales data, research and development reporting requirements for vaping products. Reported data on vaping product sales should include information on vaping products by brand sold in Canada and for export. Further reportable data should include information on ingredients of vaping substances by brand sold in Canada. The data collected should be closely audited for accuracy. This would be especially important for accountability in data concerning products manufactured for export with over 20 mg/mL of nicotine content, which still seems to be making its way into retail stores for illegal sale as well as online availability.

Restricting Youth Access to Tobacco Products

Policy efforts to restrict youth access to tobacco products has been instrumental in decreasing tobacco use rates over the last 20 years. Additional policy options remain available to further protect youth from the harms of tobacco.

Raising the Legal Age to Purchase Tobacco and Vaping Products

In the absence of implementing a smoke-free generation policy, at minimum, the age for purchasing tobacco and vaping products should be unified across the country as being at least 19 years of age. However, serious consideration should be given to increasing the age of purchase to 21 years of age. Research has demonstrated that raising the age to 21 could reduce the smoking initiation rate among youth, decrease cases of lung cancer and prevent premature death ([Oyston, 2017](#)). The effects of nicotine are known to harm the developing brain and more easily lead to addiction in younger people ([Goriounova & Mansvelder, 2012](#)). Increased age restrictions for purchasing tobacco and vaping products could result in fewer life-long smokers.

Retail Density

Tobacco products are still available in commonly accessed retail locations such as grocery stores and convenience stores. We call on the Federal Government to further decrease the number of locations where tobacco products can be legally sold by restricting sales to specialty tobacco shops. This would align the sale of commercial tobacco products with the retail model for cannabis products which must be sold within their own dedicated specialty shop. This serves to limit visibility and access to youth to retail locations they do not commonly access. Furthermore, we call on the Federal Government to close the vending machine loopholes within the TVPA to make tobacco products less accessible.

National Health Promotion Campaign

Research demonstrates that tobacco-related mass media campaigns can be effective in influencing adult and youth tobacco use ([Durkin, Brennan & Wakefield, 2022](#)). We applaud the Federal Government on their current smoking cessation mass media campaign aimed at encouraging people who smoke to quit. Due to the risk of youth vaping leading to tobacco use, we call on the Federal Government to implement a national vaping mass media campaign to educate the public about the risks and harms of vaping for non-smokers and youth, as well as the laws around the sale and supply of vaping products to minors as vaping mass media campaigns would likely have a similar effect ([Hair et al., 2023](#)).

Rescind the Duty-Free Shop Exemption

Currently tobacco products cannot be handled before purchase except for duty-free shops ([Health Canada, 2023](#)). We call on the Federal Government to rescind this exemption and align duty-free shops with all other retail outlets that sell tobacco products.

Taxation and Pricing

Increasing taxation on vaping products as well as further taxation on tobacco products will continue to have a significant effect on protecting youth from using tobacco and vaping products ([Ontario Tobacco Research Unit, 2012](#)). An additional option may include mandating tobacco companies to sell smaller packages of tobacco products. This would prevent youth from accessing larger quantities of tobacco at one time.

Enhancing Awareness and Preventing Canadians from being Deceived or Misled

Health Messaging

To augment the measures imposed in 1989 by Health Canada, the TVPA has included strong language towards prohibiting the retail sale of tobacco products by including health warnings and health information messaging. The recently updated health messaging on cigarette packages is effective, including health warnings on individual cigarettes which is a good way to remind people who smoke each time they remove cigarettes from a pack of how it affects their health. This also conveys the message to individuals who may be occasional smokers and obtain individual cigarettes from social sources. Cigarettes as a consumer product now provide a great deal of health messaging on the packaging and when combined with a plain packaging appearance, provides a uniform presentation that delivers health messages without bold colours for promotion or brand recognition. To build on the success of health messaging on individual cigarettes, maximizing health messaging on individual cigar product packaging would ensure cigar smokers are also fully aware of the potential health hazards of smoking, especially considering many full-size cigar products are purchased individually and not in a box.

The current measures are all commendable steps on the part of the Government of Canada towards mitigating initiation and continuance of smoking. In 2018, 15.8% of Canadians 12+ smoked cigarettes with the smoking rates falling 1-2% annually to a rate of 11.8% in 2021 ([Statistics Canada, 2018](#); [Statistics Canada, 2022](#)). Evidence suggests youth vaping is now on the rise and surpassing tobacco smoking rates from 2021 with 13% of youth 15-19 years of age and 17% of youth 20-24 years of age, compared to 4% of adults 25 years and older, reporting vaping ([Health Canada, 2023](#)). It is imperative the same health warnings and negative health effects captured in the TVPA and associated regulations are applied to vaping products.

The enhancement to product packaging and labelling included in the Tobacco Products Appearance, Packaging and Labelling Regulations that came into force on August 1, 2023, is another positive addition to reduce the influence of commercial tobacco product marketing. Our recommendation would be to shorten the transition period for tobacco manufacturers to comply with the Regulation from July 31, 2026, to January 1, 2025, to expedite the benefits of the enhanced health messaging to the public.

Although national surveys conducted by Health Canada ([CTADS, 2017](#); [CTADS, 2021-2022](#)) indicate a number of Canadians have awareness of the harms associated with smoking cigarettes, the use of vaping products is perceived as harmless ([Kelsh, et al., 2023](#)). Prompt attention should be paid towards researching and communicating the associated harms of inhaling vapour from vaping products due to the high number of youth vaping ([Health Canada, 2023](#)).

Product Standards and Promotion

Current standards and promotion restrictions are effective in preventing the public from being misled across a broad spectrum of mediums. However, further is required in limiting social media influence. Websites for tobacco retailers often present their products in appealing ways and pro-tobacco groups often use social media content to effectively circumvent promotional restrictions. To add to this concern, young people can often access this content with little or no restrictions to what young people see (PHO, 2023).

It is important the TVPA prohibits false inferences regarding information that could skew perceptions of reduced harms related to commercial tobacco products in social media. It would be timely, given the increase in e-cigarette use by youth, to prohibit the use of the term “e-juice” in the promotion of vaping liquids and similarly with commercial tobacco products, integrate plain packaging for e-cigarettes and e-liquids.

Compliance, Enforcement and Regulated Parties

Enhancing Compliance Support

Compliance and enforcement are integral components of commercial tobacco control in Canada. The TVPA holds a broad number of very important restrictions that are essential to achieving tobacco control goals like a 5% smoking rate by 2035 ([CTS, 2023](#)). Uniform and comprehensive enforcement of these laws at the federal and provincial levels is essential. Health Canada reporting high non-compliance rates from a relatively low number of retail inspections is a strong indicator that there is more work to be done in the arena of frontline inspection. The discussion paper accompanying this legislative review mentions Health Canada Inspectors conducted 2000 retail inspections in 2022/23 which is significant, but it should be noted that there are thousands more tobacco retailers than that number who sell these products in the Greater Toronto Area alone. This indicates a much stronger commitment is needed, translating to many more inspectors being available, to inspect a higher number of retailers and address non-compliance issues with all aspects of the TVPA. In addition, dedicated efforts to address non-compliance with online sales and promotion of tobacco products is the new and emerging arena that will require more attention to slow the rate of new tobacco (and vaping product) consumers becoming lifelong customers.

Divert Funding

Challenges with requiring tobacco manufactures to cover tobacco control costs will include long and drawn-out court proceedings, companies using bankruptcy laws to lengthen the process, and difficult negotiations to obtain meaningful and substantial remuneration. Opportunities will include being able to divert more funding to tobacco control both at the federal level to tackle emerging issues, while also allowing for transfer payments to the provinces for additional tobacco control efforts and public health initiatives that will move the needle towards the 2035 goals of a 5% smoking rate Canada-wide ([CTS, 2023](#)).

FCTC Article 5.3

It would be helpful to have more details on what Canada has initiated thus far to respond to the WHO FCTC commitments laid out in Article 5.3.

Engaging with Indigenous Peoples

Community-Focused Approach

There is a need to explore directly with the Indigenous population, the impact of intergenerational trauma intertwined with a culture of acceptance of cigarette use, to determine the elements necessary to reduce tobacco use within their communities. The research article by [Wright and Dell \(2020\)](#) revealed various factors that promoted youth resiliency towards smoking between First Nations Communities. Determining priorities and approaches for tobacco prevention and cessation programming for these communities would be most impactful if they directly involve local representatives from the communities to lead advocacy, planning, implementation and enforcement efforts.

Provincial Taxation

The highest smoking rates of any population group in Canada are Indigenous, Inuit peoples ([APS, 2017](#)). Indigenous populations living on reserves report higher rates of daily cigarette use than those living off reserves ([APS, 2017](#)). There is a noted contradiction between the use of taxation, which has a positive impact on reducing tobacco use ([Physicians for a Smoke-Free Canada, 2023](#)) and the availability of lower cost cigarettes on reserves that are exempt from provincial taxes. Exploring mechanisms to increase the cost of cigarettes distributed on reserves could lead to the same positive impact in reducing tobacco use for Indigenous populations.

Counselling

There are a number of culturally sensitive resources that have been developed to benefit the First Nations, Inuit and Metis communities such as the CAMH <https://www.nicotinedependenceclinic.com/en/teach/practitioner-resources/teach-tool2> and the Canadian Cancer Society <https://www.smokershelpline.ca/talktobacco/home> which are promoted locally by PHUs within Indigenous groups.

Indigenous Peoples are able to access free nicotine replacement therapy (NRT) which is an effective quit aid and a positive component towards supporting an individual to quit smoking tobacco products. The use of NRT as a quit aid is more effective when combined with a counselling component ([Hartmann-Boyce et al. 2019](#)). Therefore, establishing trained peer leaders to provide counselling at no cost, combined with the NRT, would be most advantageous.

Embracing Indigenous leaders and positive role models from within their communities to become involved in addressing the health issues surrounding tobacco use by supporting and promoting a smoke-free lifestyle, could be an important strategy to reduce tobacco use in Indigenous communities.

Conclusion

Simcoe Muskoka District Health Unit and the Central East Tobacco Control Area Network thank you for the opportunity to comment and commend the Federal Government's actions towards addressing tobacco use in Canada. Despite significant progress in tobacco control, the health and economic burdens of tobacco-related disease in Canada remain unconscionably high. Moreover, vaping, waterpipe smoking, and cannabis smoking have added further complexity to the smoking and nicotine control landscape that risks undoing the tremendous progress that has been made. Continued advancements in tobacco control action in a coordinated and comprehensive manner is needed to save lives, protect young minds, reduce health inequities, and save money.

Sincerely,

ORIGINAL Signed by:

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