

September 6, 2018

Appendix A to Report No. 062-18

Tobacco Control Directorate  
Health Canada  
150 Tunney's Pasture Driveway  
Ottawa, Ontario  
K1A 0K9

## **RE: Support for Plain and Standardized Tobacco Products and Packaging**

At its May 19, 2016 meeting the Middlesex-London Board of Health reviewed Report No. 033-16 re *Plain and Standardized Packaging – Reducing the Impact of Tobacco Marketing on Smoking Behavior*, attached, and recommended that the Government of Canada implement plain and standardized tobacco product packaging. Plain and standardized packaging should apply to all tobacco products, and the slide and shell package format should be required for cigarettes. These regulations should be adopted as soon as possible without being weakened. The Middlesex-London Health Unit applauds the Government of Canada's plan to introduce plain and standardized tobacco products and packaging in Canada, and fully supports the proposed Tobacco Products Regulations (Plain and Standard Appearance).

The Government of Canada has committed to achieving 5% tobacco use rate by 2035. In order to achieve this goal, bold and innovative measures are necessary such as implementing plain and standardized packaging for commercial tobacco products with the strongest regulations possible. Tobacco companies often challenge plain and standardized packaging stating it is an ineffective intervention. However, evidence shows that plain and standardized packaging reduces the appeal of tobacco products and reduces the prevalence of smoking. For example, after plain packaging was introduced in Australia, a significant decline in smoking prevalence and increase in calls to quit lines was observed.<sup>1</sup> In addition, with plain and standardized packing in place, Canadian youth will no longer be exposed and targeted by appealing tobacco packages.

With many forms of tobacco advertising prohibited, the tobacco pack has become the main form of advertising to current and potential users. Colours, logos and images reinforce the brand and undermine graphic health warnings. The tobacco pack serves as a mini billboard, travelling everywhere with the customer and coming into view multiple times a day. Tobacco companies are very protective and vehemently oppose plain and standardized tobacco packaging. Industry documents explain: "With tobacco advertising bans, the only thing left is the pack. You have to put your entire brand image into the pack to draw new customers to you."<sup>2</sup>

Plain and standardized packaging is a key priority to strengthen tobacco control measures already in place across Canada and one of the most important measures that can be undertaken to lower our nation's smoking rate. The Middlesex-London Health Unit commends the Government of Canada for their leadership in introducing this legislation, and their commitment to protecting the health of Canadians.

Sincerely,



Christopher Mackie MD, MHSc, CCFP, FRCPC  
Medical Officer of Health/CEO  
Middlesex London Health Unit  
50 King St.  
London, ON  
N6A 5L7

References:

- <sup>1</sup> Smoke-Free Ontario Scientific Advisory Committee. Ontario Agency for Health Protection and Promotion (Public Health Ontario). (2016). Evidence to guide action: comprehensive tobacco control in Ontario. Toronto, ON: Queen's Printer for Ontario.
- <sup>2</sup> Frans van Heertum, as quoted in S. Rossel, "The cigarette pack has just begin it's life": Interview with cigarette packaging designers", *Tobacco Journal International*, 8 May 2008.



TO: Chair and Members of the Board of Health  
FROM: Christopher Mackie, Medical Officer of Health and CEO  
DATE: 2016 May 19

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**PLAIN AND STANDARDIZED PACKAGING-REDUCING THE IMPACT OF TOBACCO MARKETING ON SMOKING BEHAVIOUR**

**RECOMMENDATIONS**

*It is recommended that:*

- 1. The Board of Health sign the endorsement, attached as Appendix A, recommending that the Government of Canada implement plain and standardized tobacco product packaging; and,*
- 2. In support of the National Campaign, the members of One Life One You visit local MPs to provide education and promote the importance of plain and standardized tobacco product packaging prior to proposal submission to Cabinet, anticipated for fall 2016.*

**Key Points**

- In Nov. 2015, the Federal Government committed to implement plain packaging and to make it a top priority as stated in a letter to the Minister of Health.
- The tobacco package is one of the only remaining marketing tools that the tobacco industry has to promote its deadly product, serving as a mini billboard, using colours, images, logos, slogans and distinctive fonts, finishes, and sizing configurations to make their product appealing and attractive to tobacco users and to recruit new tobacco users.
- An extensive body of evidence has shown that that plain and standardized packaging enhances the effectiveness of the graphic health warnings and curbs deceptive messages about tobacco products, reducing tobacco use.
- Several national health agencies led by the Heart and Stroke Foundation, the Non-Smokers' Rights Association and the Canadian Cancer Society (CCS) are developing a coordinated national campaign to support the Federal Government's plan.

**Background**

Legislation prohibiting how and where tobacco companies can advertise tobacco products has necessitated the development of tobacco packaging that is, in essence, a mini billboard to promote tobacco companies' deadly products in compelling ways. Clever marketing that uses colourful and eye-catching logos and graphics, and sleek, sculpted packages containing monogrammed or stylized cigarettes appeals to tobacco users and potential new smokers alike.

Replacing the flashy tobacco package with a plain package containing only the brand name and health warning would eliminate tobacco brand promotion, curb deceptive messaging using descriptors such as "light" or "mild", strengthen the impact of the graphic health warnings and reduce tobacco use overall.

Plain packaging of tobacco products is not a new idea. Australia was the first country to mandate plain packaging in Dec. 2012, and the UK and France are implementing plain packaging in May 2016. Ireland has enacted legislation and is currently waiting on an implementation date. Plain packaging is being formally considered in 9 other countries including Canada, Sweden, South Africa, Finland, Norway and

Belgium. In Canada in 2015, the Federal Government committed to implementing plain packaging as part of its electoral platform and referred to it as a top priority in a letter to the Minister of Health.

There is an extensive body of evidence in support of implementing plain packaging and additional studies that have documented the Australian experience. As expected, the tobacco industry has responded through legal action; however, both a constitutional challenge and tobacco industry legal claim against the Australian government have been dismissed.

### **The National Campaign for Plain and Standardized Packaging**

Several national health agencies led by the Heart and Stroke Foundation, the Non-Smokers' Rights Association and the Canadian Cancer Society (CCS) are developing a national campaign to support the Federal Government's plan to require plain and standardized packaging. The proposal put forth to the Canadian government would require that packages are void of colour, logos, branding, slogans, images and/or stylized fonts. Further, all packages would have standardized dimensions (size and shape), and would not include any distinctive finishes or specialty formats. With campaign support and health agency endorsement across Canada, the Government of Canada has the opportunity to address the remaining forms of tobacco marketing. The inclusion of standardization goes above and beyond plain packaging efforts in other countries and will position Canada as a leader in tobacco control once again. Throughout this process there will be ongoing opportunities for involvement at the regional and local level. A provincial coalition comprised of representatives from public health units and Smoke-free Ontario provincial partners is developing a social marketing campaign to raise awareness of the tobacco industry's practices with respect to branding, packaging and design, and to promote the impact that tobacco packaging has on youth initiation. The Tobacco Prevention Health Promoter and Youth Development Specialist from the Health Unit and SW TCAN are active members of this provincial coalition.

### **Opportunities for Action**

To show support for plain and standardized packaging, the Canadian Cancer Society has prepared an endorsement form for signature by as many national, provincial and regional health agencies as possible. Collecting a large number of these endorsements is an essential part of the effort to demonstrate to the Canadian Government that there is widespread support for plain and standardized packaging. Signing the *Plain and Standardized Packaging Endorsement Form*, attached as [Appendix A](#), is an opportunity for the Middlesex-London Board of Health to communicate its support to the national campaign and to recommend the implementation of plain and standardized packaging by the Federal Government. To support the campaign at the local level, members of *One Life One You* will visit local MPs to provide education and promote the importance of plain and standardized packages, prior to the proposal submission to Cabinet in the fall of 2016.

This report was prepared by Mrs. Lori Fellner, Youth Development Specialist, South West Tobacco Control Area Network (SWTCAN), Ms. Jacqueline Uprichard, Health Promoter for the Chronic Disease Prevention and Tobacco Control (CDPTC) Team, Ms. Donna Kosmack, SWTCAN Manager and Ms. Linda Stobo, CDPTC Program Manager.



Christopher Mackie, MD, MHSc, CCFP, FRCPC  
Medical Officer of Health and CEO

**This report addresses the following requirements of the Ontario Public Health Standards (2015): Foundational Standard 1, 9; Chronic Disease Prevention 1, 7, and 11.**

**Endorsement of Plain and Standardized Packaging**

Plain and standardized packaging would prohibit all promotional features on all tobacco packaging, including the use of colours, images, logos, slogans, distinctive fonts, and finishes. Only the brand name would be allowed. Health warnings would remain on packages. The size and shape of the package would be standardized, thus prohibiting specialty package formats, such as slim and superslim cigarette packages that reduce warning size and overtly target women. The appearance of cigarettes would also be standardized, at a minimum prohibiting the use of branding, logos, colours and special finishes, and establishing standards for cigarette length and diameter.

Our organization endorses a requirement in Canada for plain and standardized packaging, as outlined above.

Name of organization: Middlesex-London Board of Health

Name of organization representative: Mr. Jesse Helmer

Title: Chair, Middlesex-London Board of Health

Signature:  \_\_\_\_\_

Date: 19 May 2016 \_\_\_\_\_

Name and email for organization contact: Dr. Christopher Mackie, Medical Officer of Health and CEO  
Email: christopher.mackie@mlhu.on.ca