

James Van Loon, Director General
Tobacco Products Regulatory Office
Tobacco Control Directorate, Controlled Substances and Cannabis Branch
Health Canada
Address Locator 0301A, 150 Tunney's Pasture Driveway
Ottawa, Ontario K1A 0K9
Email: hc.tcp.questions-plt.sc@canada.ca

Dear Mr. Van Loon;

The Middlesex-London Board of Health and its staff share Health Canada's concerns regarding the increase in vapour product use by young people in Canada. The Board of Health applauds Health Canada's commitment to work with provincial and territorial partners to enhance national collaborative and cooperative efforts to reduce youth vaping. With the growing concerns related to the health consequences of vaping, and the ongoing investigation of severe pulmonary illnesses across the United States and Canada, the need for strengthened policy measures to limit youth access, vapour product appeal and advertising is amplified.

At its meeting on October 17, 2019, the Middlesex-London Board of Health heard a delegation from Western University's Human Environments Analysis Laboratory Youth Advisory Council (HEALYAC). HEALYAC is comprised of 14 high school students (13-18 years) representing diverse communities within the city of London. The HEALYAC identified vaping as one of the most important health issues facing youth in the London community. To share their concerns with public health and other community stakeholders, they wrote the attached Position Statement, "*Vaping in Schools and Student Health*". The Board of Health and its staff share the concerns that are outlined in the HEALYAC position statement, which is attached for your consideration, and commend them for their youth advocacy.

With a 74% increase in youth vaping and a 45% increase in youth smoking from 2017 to 2018 in Canada ([Hammond, D. et al., 2019](#)), in addition to growing concerns about the health harms associated with vapour product use, the Board of Health is concerned about the growing rates of nicotine addiction in young people, after decades of decline in youth smoking rates. To reduce youth access, appeal and advertising of vapour products, please consider the following regulatory measures under the *Tobacco and Vaping Products Act*:

- Align the restrictions for vaping product advertising with the approach taken to regulate the promotion and advertising of tobacco products: promotion of vaping products should be prohibited at premises where vape products are sold and youth are permitted access, in/at all places of entertainment, and on all forms of broadcast media, including online advertisements.
- Restrict the retail display of vaping products, as well as all images and models of these products in places where children and youth have access.
- Strengthen the current approach to regulating flavoured e-substances to include tighter prohibitions on the manufacturing and sale of e-substance flavours that are attractive to youth and adolescents, with an overall reduction/market cap on the number of flavours available for sale in Canada.
- The nicotine concentration level for e-substances should not exceed 21 mg/ml, which is in alignment with the European Union Tobacco Products Directive, which states that this concentration allows for delivery of nicotine that is comparable to a standard cigarette.
- Use the same approach that has been applied to tobacco and cannabis products, by enacting plain and standardized vapour product design and packaging requirements, and the enactment of stringent health warnings.

- Strict age-verification measures should be required for online sales, including age-verification at time of purchase (photo technology of government-issued ID) and proof of legal age at delivery. Online sales should be enforced by Health Canada.
- Vaping products are not regulated as an approved cessation aid in Canada; therefore, a prohibition on the use of cessation and health claims by manufacturers, distributors, and retailers about vaping products is warranted.
- Product manufacturers should be held to the same level of accountability and scrutiny as tobacco product manufacturers, through the enactment of vapour product information and reporting regulations.
- Dedicate research funding to better understand the potential benefits and risks associated with the use of vapour products. Research findings can be used to inform the development of future regulations.

Growing concerns related to health harms associated with vaping product use and the uptick of vaping across Ontario and Canada is a significant public health concern, and we thank you for your consideration and continued efforts to develop and refine health protective measures that will help to safeguard the health of our community. The Middlesex-London Board of Health and its staff are committed to working with Health Canada to address this emerging issue of public health concern.

Sincerely,

Trish Fulton, Chair
Middlesex-London Board of Health

Attachments:

Middlesex-London Board of Health Report 059-19, “Collaborative Action to Address Vaping Concerns”
HEALYAC Position Statement: Vaping in Schools and Student Health

cc: The Honourable Ginette Petitpas Taylor, Minister of Health
hcmminister.ministresc@canada.ca

Mr. Peter Fragiskatos, MP London North Centre
Peter.Fragiskatos@parl.gc.ca

Ms. Irene Mathyssen, MP London-Fanshawe
Irene.Mathyssen@parl.gc.ca

Ms. Karen Vecchio, MP Elgin-Middlesex-London
Karen.Vecchio@parl.gc.ca

Ms. Kate Young, MP London West
Kate.Young@parl.gc.ca