

TO: Chair and Members of the Board of Health

FROM: Christopher Mackie, Medical Officer of Health
Emily Williams, Chief Executive Officer (Interim)

DATE: 2021 September 16

SUBMISSION TO HEALTH CANADA'S CONSULTATION ON THE PROPOSED VAPING PRODUCTS' FLAVOUR REGULATIONS AND ORDER

Recommendation

It is recommended that Report No. 39-21 re: "Submission to Health Canada's Consultation on the Proposed Vaping Products' Flavour Regulations and Order" be received for information.

Key Points

- Most young people prefer flavoured vapour products, and in many instances, flavours are responsible for recruiting new young vapers. Using vapour products is not safe and presents additional risks for young people during the final stages of brain development.
- In Ontario, the Association of Local Public Health Agencies (alPHA) has adopted a resolution calling for federal and provincial action on e-cigarettes. The resolution was sponsored by the Middlesex-London Board of Health and urges governments of Ontario and Canada to enact policy measures based on recommendations by the Council of Chief Medical Officers of Health.
- Health Canada sought input on the proposed Order Amending Schedules 2 and 3 to the *Tobacco and Vaping Products Act* and the proposed Standards for Vaping Products' Sensory Attributes Regulations to address the rapid uptick in vaping and to reduce harms from vapour product use; the Health Unit's submission is attached as [Appendix A](#).

Background

Widespread availability and an abundance of flavours of vaping products in Canada has increased vaping rates among youth at an alarming rate. In a 2019 study by Hammond et.al. showed a 74% increase in vaping among Canadian youth from 2017 to 2019. The percentage of youth who reported using a vapour product within the last 30 days increased from 8.4% to 14.6%.

Results from the 2018-19 Canadian Student Tobacco, Alcohol and Drugs Survey (CSTADS) show e-cigarette prevalence rates among Canadian grade 7 to 12 students have doubled from 10% in 2016-17 to 20% in 2018-19. Nicotine is harmful to youth as it can alter their brain development and affect their memory and concentration.

For Young People, It's all about the Flavour

The 2020-2021 Youth and Young Adults Vaping Project, (YYAVP) found that 92% of young people used a flavoured vaping product at initiation and 90% continued to vape flavoured products. Among young people, mint/menthol was the second most popular flavour, while tobacco was the least favourite flavour. Additionally, it has been found that adolescents consider the flavour of vaping products to be the most

important factor when considering using the product. Therefore, a flavour restriction should include mint and menthol flavours, as they have been shown to make vapour products more appealing to young people.

Gateway Drug

In addition to a gateway to nicotine addiction, vaping may increase the risk of subsequent cigarette initiation. In a paper published in 2019, Berry, et. al. found that young people who use e-cigarettes are four times more likely to smoke tobacco cigarettes. Similarly, a study published in 2020 found that individuals who used vapour products were five times more likely to become regular cigarette smokers in a years' time as compared to non-vapour product users.

This is concerning as young people who transition to smoking regular combustible cigarettes, or become dual users are then being exposed to the added chemicals found in combustible cigarettes as well as the carcinogens from the combustion.

Opportunity for Protective Policy Measures through Federal Regulation

The availability of flavours in vapour products have posed significant challenges in Public Health efforts to halt vapour product uptake, especially by young people. Health Canada and the Ontario Ministry of Health should be commended for their work thus far to address vaping, but additional regulations are required. As such, the health unit has responded to Health Canada's request for comments on proposed changes to the Order Amending Schedules 2 and 3 to the *Tobacco and Vaping Products Act* and the proposed Standards for Vaping Products' Sensory Attributes Regulations, attached as [Appendix A](#). Additionally, further references are found in [Appendix B](#).

This report was prepared by the Healthy Living Division.



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



Emily Williams, BScN, RN, MBA
Chief Executive Officer (Interim)