



Ontario Public Health Association
 l'Association pour la santé publique de l'Ontario
 Established/Établi 1949

The mission of OPHA is to provide leadership on issues affecting the public's health and to strengthen the impact of people who are active in public and community health throughout Ontario.

44 Victoria St., Suite 502
 Toronto, ON M5C 1Y2

Tel: (416) 367-3313
 Fax: (416) 367-2844
 E-mail: admin@opha.on.ca
www.opha.on.ca

President
 Karen Ellis-Scharfenberg
 E-mail: president@opha.on.ca

Executive Director
 Pegeen Walsh
 E-mail: PWalsh@opha.on.ca

Constituent Societies

Alliance for Healthier Communities

Association of Public Health
 Epidemiologists in Ontario (APHEO)

Association of Supervisors of
 Public Health Inspectors of Ontario
 (ASPPIO)

Canadian Institute of Public Health
 Inspectors (Ontario Branch) (CIPHIO)

Community Health Nurses'
 Initiatives Group (RNAO)

Health Promotion Ontario (HPO)

Ontario Association of Public
 Health Dentistry (OAPHD)

Ontario Association of Public Health
 Nursing Leaders, (OAPHNL)

Ontario Dietitians in Public Health
 (ODPH)

Ontario Society of Physical Activity
 Promoters in Public Health (OSPAPPH)

Charitable Registration
 Number 11924 8771 RR0001

October 8, 2018

Ms. Laura Pisko
 Director, Health Protection Policy and Programs Branch
 Ministry of Health and Long-Term Care
 393 University Avenue, Suite 2100
 Toronto, ON M7A 2S1

Re: Ontario Regulation 268/18 Smoke-Free Ontario Act, 2017, Proposal #18-HLTC024

Dear Ms. Pisko,

The Ontario Public Health Association (OPHA) appreciates the opportunity to comment on Ontario Regulation 268/18 regarding the use and retail of vapour products and cannabis. Specifically, the OPHA wishes to convey its concerns about proposed regulations regarding the display and promotion of vapour products and the health implications. While we recognize the utility of vapour products as a quit-smoking aid, we are concerned that permitting the display and promotion of vapour products will increase young people's exposure and use of them. We urge your ministry to prohibit the display and promotion of these products in accordance with regulations regarding tobacco products. Our rationale for this recommendation is outlined below.

Risks that vaping poses to youth

Health Canada has reported that vaping is less harmful than smoking, and that switching from tobacco products to vapour products will reduce exposure to toxic chemicals and improve general health over the short-term.¹ However, while Health Canada has acknowledged that vaping may be a useful quit-smoking aid, the department discourages non-smokers from using vapour products. Health Canada has also raised concerns about vapour products appealing to youth, the potential of nicotine-containing vapour products to promote tobacco use and that regular vaping can lead to nicotine dependence.¹ Research has shown that nicotine may be especially harmful for children and youth, as it can alter brain development, memory and concentration.¹ Children and youth are especially vulnerable to nicotine addiction that may develop through use of vapour products.

The US National Academies of Science, Engineering and Medicine have found that youth who vape have shown symptoms of respiratory disease, including coughing, wheezing and worsening of asthma.² Vaping devices increase the risk of heart disease and daily use of e-cigarettes nearly doubles the risk for heart attack.³

Vaping increasing among youth

The University of Waterloo's Propel Centre has reported a 46% increase in vaping in non-smoking youth in grades 10-12 in the last two years.⁴ Research from The US National Academies of Science, Engineering and Medicine has found that e-cigarette use increases the risk of cigarette smoking in youth and young adults.³ Leading health officials in the US have deemed vaping an epidemic, specifically with regards to vapour products produced by a company called "Juul."⁵ They report that American teens who have never smoked are becoming addicted to nicotine through use of "Juul's."⁵ Teens may consume an entire Juul within one day. A single Juul contains the nicotine equivalent of twenty cigarettes, and provides faster and smoother absorption of nicotine.⁵ It is unfortunate that Juul and similar products are now available and being promoted in Ontario.

OPHA is concerned that displaying and promoting vapour products in places such as convenience stores and gas bars will increase vaping and subsequent nicotine addiction and cigarette smoking in youth. The bright colours and candy flavours of Juul's and other vapour products are already appealing to youth. Unrestricted marketing of products such as Juul's will exacerbate the problem of vaping in Ontario youth. OPHA is concerned that progress made over the last 20 years in reducing youth smoking and changing cultural norms by de-normalizing tobacco use is now being undermined as teens acquire nicotine addiction through such e-cigarettes. Tobacco use creates an undue health and economic burden on our society. It is the leading cause of preventable death and disease in Ontario.⁶ Over two billion dollars a year is spent by Ontario to treat and care for people with smoking-related health concerns; over five billion dollars a year is lost in productivity or missed days of work because of smoking-related health issues.⁶

Recommendations for marketing of vapour products

Other jurisdictions are also concerned about young people's use of vaping products and the marketing tactics being used to appeal to children and youth. This past September, the FDA gave the US-based Juul company 60 days to develop a strategy to prevent youth from accessing their product, or risk removal of their product from the market.⁵

Earlier this year, our colleagues at the Canadian Public Health Association (CPHA) called on the Federal government to develop regulations around the display and promotion of vaping devices.⁷ The CPHA also called on the government to limit the flavours of vapour products that appeal to youth, and to support research into the societal influences that lead youth to try nicotine-containing products such as vapour products and to develop programming to address this issue.⁷

The Ontario Campaign for Action on Tobacco reports that 69% of Ontarians support restrictions on the marketing of vapour products.⁸ In alliance with partners of the OCAT such as The

Heart & Stroke Foundation, and The Canadian Cancer Society, OPHA calls for action from the Ontario government to spare another generation from nicotine addiction.

OPHA is a member-based, non-profit organization whose mission is to take leadership on issues affecting the public's health and promote healthy public policy. Our members, who span a broad range of sectors including health care, public and community health, academia, voluntary and private sector are concerned. As such, we recommend that the Ontario Government adopt our recommendation that provincial restrictions be placed on the display and promotion of vapour products similar to regulations for the display and marketing of tobacco. Seven Canadian provinces already have legislation in place which bans the promotion and display of vapour products in convenience stores and non-specialty vape stores,⁵ and we urge the Ontario Government to adapt similar measures.

Please don't hesitate to contact me at pwalsh@opha.on.ca or by calling 416 367-1281 should you have any questions or require any clarification regarding this submission.

Thank you for your consideration.



Pegeen Walsh
Executive Director
Ontario Public Health Association

References

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