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Constituent Societies

Association of Ontario Health Centres (AOHC)

Association of Public Health Epidemiologists in Ontario (APHEO)

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

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 3, 2019

Ontario Minister of Health College Park, 5th Floor, 777 Bay St, Toronto ON M7A 2J3

Dear Minister Elliott,

Re: Recommended Actions to Protect Youth against Harms from Vaping

I am writing on behalf of the Board of Directors and members of the Ontario Public Health Association to thank you for your recent decision to require hospitals to report on cases of severe pulmonary disease related to vaping. We are encouraged by your recent statements indicating the seriousness of the harms from vaping and your intention to identify evidence-based solutions that can protect the health of young Ontarians.

We urge your government to proceed quickly in implementing two key measures:

First, ban all marketing of vaping products, with only specialty shops that have age restrictions being exempted. This approach has been adopted in seven other Canadian provinces and will help counter the existing perception that vaping is a "normal product' and safer than tobacco.

Secondly, ban the sale of flavoured vaping products with only specialty shops being allowed to sell those flavoured products that are most often used for cessation. This approach would reduce youth exposure to dessert, candy, fruit and pop flavoured vaping products that hold significant appeal while allowing their sale in specialty shops where youth will not be exposed to the marketing of these enticing products.

Such measures are urgently needed given the following recent troubling developments:

- the serious illnesses experienced by hundreds of young people in the United States from using vaping products as well as recent vaping related deaths;
- the lack of knowledge about the health impacts of vaping products;
- the increasing rates of youth vaping in Ontario and Canada; Dr. David Hammond's recent research identified a 74 percent increase;
- the declaration by the United States Food and Drug Administration of teen vaping as an "epidemic," due to the 78 increase in youth vaping by high schools students in 2018;

- the targeting of youth by vaping companies;
- the purchase by tobacco companies as full or part-time owners of many of the most popular ecigarette brands;
- the increase in youth cigarette smoking rates in Canada from 10.7 per cent in 2017 to 15.5 per cent in 2018, following decades of research showing a decline; and
- the research indicating that vaping increases the likelihood of smoking among young people.

We understand the need to balance the interests of some adult addicted smokers who may benefit from reduced smoke exposure through vaping alternatives against the potential harms to youth. In this case, the health of Ontario's youth needs to be put first. It is alarming to see the first increase in youth smoking in a generation given the life-long consequences for their health and the costs to the health care system.

Your ministry indicated its intention to consult with experts in "informal roundtables". Given our members expertise includes those active in both front line and management roles be it in school health, chronic disease prevention, disease surveillance or tobacco control as tobacco inspectors, school health nurses, health promoters or epidemiologists, our members have much expertise to offer and welcome the opportunity to contribute both short and medium term suggestions as part of these discussions. Please don't hesitate to contact me at 416 367-1281 or at pwalsh@opha.on.ca.

Thank you for your consideration.

Pegeen Walsh

Executive Director

P. Wall

c.c Ms. Robin Martin, Parliamentary Assistant – Health

Dr. David Williams, Chief Medical Officer of Health for Ontario