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Association of Ontario  
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Association of Public Health  
Epidemiologists in Ontario

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Public Health Inspectors of  
Ontario

Canadian Institute of Public Health  
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Health Promotion Ontario

Ontario Association of Public  
Health Dentistry

Ontario Society of Nutrition  
Professionals in Public Health

The Ontario Association of Public  
Health Nursing Leaders

*Charitable Registration  
Number 11924 8771 RR0001*

August 31, 2016

Tobacco Products Regulatory Office,  
Tobacco Control Directorate,  
Health Canada,  
AL 0301A, 150 Tunney's Pasture Driveway,  
Ottawa, Ontario K1A 0K9

**Re: Consultation on "Plain and Standardized Packaging" for Tobacco Products**

Dear Madam/Sir:

On behalf of the Ontario Public Health Association (OPHA), I have the pleasure of providing this submission in response to the consultation document released by Health Canada entitled: "Plain and Standardized Packaging" for Tobacco Products. The OPHA congratulates and strongly supports the federal government's plan to implement plain and standardized packaging in Canada.

**Smoking costs Ontario lives**

Smoking is the number one cause of death and disease in Ontario. 13,000 Ontarians die each year as a result of tobacco-related diseases. According to the 2014 Canadian Community Health Survey (CCHS), 17.6% of those aged 19 and over (1,859,000 users) were current smokers. In fact, the prevalence of current smoking was 25% or more in three of Ontario's 36 health regions and was highest among workers in manufacturing, trades, and primary industry.<sup>1</sup> In addition, too many Ontarians continue to be exposed to second-hand smoke in public places, indoors at work, inside a vehicle, or in their home. Direct costs to health care due to tobacco was \$1.93 billion, with a further \$5.8 billion attributed to productivity lost due to illness and premature death.<sup>2</sup>

<sup>1</sup> Ontario Tobacco Research Unit (OTRU). Evaluation Update: Smoke-Free Ontario Strategy Monitoring Report – Executive Summary. Toronto, ON: OTRU, February 2016.

<sup>2</sup> Rehm J, Baliunas D, Brochu S, Fischer B, Gnam W, Patra J, et al. The Costs of Substance Abuse in Canada 2002. Ottawa: Canadian Centre on Substance Abuse, March 2006.

The 2010 Smoke-Free Ontario Scientific Advisory Committee (SAC) report recommended mandating plain and standard packaging (including onserts and inserts) to help to minimize the ability of the tobacco industry to market, promote and sell tobacco products in Ontario.<sup>4</sup> Drawing on the SAC Report, in 2010 the Tobacco Strategy Advisory Group, which OPHA was a contributor, recommended to the Ontario Minister of Health Promotion and Sport to mandate plain and standardized packaging (including both outside and inside the package except government-approved health warnings) to counteract tobacco industry marketing to the consumer.<sup>5</sup> An updated March 2014 evidentiary overview, reviewing 75 empirical studies, was prepared by University of Waterloo Professor David Hammond for the Irish Government, which concluded that plain packaging will: reduce smoking initiation among youth and young adults; promote smoking cessation among established smokers; support former smokers to remain abstinent; and help to denormalize tobacco use.<sup>6</sup>

Reducing the prevalence of cigarette smoking especially among youth and young adults, is central to the Smoke-Free Ontario Strategy. Ontario aspires to become the Canadian jurisdiction with the lowest smoking rate in the country.<sup>7</sup> Plain packaging would respond to previous scientific recommendations, strengthen existing protective measures, reduce tobacco use, and promote better public health in Ontario.

The OPHA also urges that the regulations be comprehensive, and in particular that packages be required to be in the slide and shell format, and that regulations apply to the dimensions of the cigarette itself such as by banning slims and superslims cigarettes promoted to women as a more attractive option.<sup>8</sup>

Finally, it is encouraging to see that many other countries are implementing plain packaging as part of their comprehensive tobacco control strategy. We strongly endorse a requirement in Canada for plain and standardized packaging to lead with the international community. Thank you for providing us with an opportunity to provide feedback.

Sincerely,



Ellen Wodchis  
President

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<sup>4</sup> Smoke-Free Ontario – Scientific Advisory Committee. Evidence to Guide Action: Comprehensive Tobacco Control in Ontario. Toronto, ON: Ontario Agency for Health Protection and Promotion, 2010.

<sup>5</sup> Tobacco Strategy Advisory Group (TSAG). Building on Our Gains, Taking Action Now: Ontario's Tobacco Control Strategy for 2011-2016. Toronto, ON: TSAG, October 18, 2010.

<sup>6</sup> Hammond D., "Standardized Packaging of Tobacco Products: Evidence Review. Prepared on behalf of the Irish Department of Health" March 2014. <http://health.gov.ie/wp-content/uploads/2013/12/2014-Ireland-Plain-Pack-Main-Report-Final-Report-July-26.pdf>

<sup>7</sup> Government of Ontario – Ministry of Health and Long-Term Care (MOHLTC). "Building on the Smoke-Free Ontario Strategy". Toronto, ON: MOHLTC, May 26, 2015. Available at: <https://news.ontario.ca/mohltc/en/2015/05/building-on-the-smoke-free-ontario-strategy.html>

<sup>8</sup> Haglund M. Women and tobacco: a fatal attraction. National Institute of Public Health. Bulletin of the World Health Organization 2010;88:563-563. doi: 10.2471/BLT.10.080747. Stockholm, Sweden. <http://www.who.int/bulletin/volumes/88/8/10-080747/en/>