October 31, 2019

The Honourable Christine Elliott  
Minister of Health  
Hepburn Block 10th Floor  
80 Grosvenor Street  
Toronto ON M7A 1E9

Re: Promotion and Display of Vapour Products in Ontario

On September 27, 2019 at a regular meeting of the Board for the Grey Bruce Health Unit, the Board considered the attached correspondence from alPHa regarding implementing restrictions on the display and promotion of vaping products. The following motion was passed:

GBHU BOH Motion 2019-80

Moved by: Anne Eadie  
Seconded by: Brian Milne  
“THAT, the Board of Health support the correspondence from alPHa regarding Vapour Products Display and Promotion.”  
Carried

Sincerely,

Mitch Twolan  
Chair, Board of Health  
Grey Bruce Health Unit

Encl.

Cc: Honourable Michael Tibollo, Associate Minister of Mental Health and Addictions  
Dr. David Williams, Chief Medical Officer of Health  
Alex Ruff, MP Bruce-Grey-Owen Sound  
Terry Dowdall, MP Simcoe-Grey  
Benn Lobb, MP Huron-Bruce  
Association of Local Public Health Agencies  
Ontario Health Units
Hon. Christine Elliott  
Minister of Health  
10th Flr, 80 Grosvenor St,  
Toronto, ON M7A 2C4

September 19, 2019

Re: Vapour Products Display and Promotion

On behalf of the Association of Local Public Health Agencies (alPHa) and its member Medical Officers of Health, Boards of Health and Affiliate organizations, I am writing to reiterate our concerns about the ongoing proliferation of the promotion and display of vapour products in Ontario, especially as we deal with the emerging issue of vape-related severe respiratory illness.

While research has shown that vaping is less harmful than smoking tobacco, this same research shows that vaping still introduces poisonous substances into the body. In addition to this, the use of vape technology as a vehicle for nicotine and cannabis has become much more common and therefore aligns these products more closely to tobacco, for which we rightly have strict prohibitions on promotion and display.

Ontario has seen a sharp increase in youth vaping over the past two years and this will likely continue without strict prohibitions on their promotion and marketing. Emerging reports of ER admissions for incidences of vaping-related severe pulmonary disease are an immediate cause for alarm, and it is not unreasonable to anticipate more of these as the popularity of vaping increases.

Section 4.1 of the Smoke-Free Ontario Act, 2017 clearly prohibits the display and promotion of vapour products in any place where vapour products are sold or offered for sale, except in accordance with the regulations (RSO 2018, c. 12, Sched. 4, s. 3).

Regulation 268 sets out exemptions from this section, which include permission for retailers of vapour products to promote them (O. Reg. 439/18, s. 4). We strongly urge the immediate removal of this exemption and a return to the Smoke-Free Ontario Act’s original intent of placing the same prohibitions on the promotion and display of vape products as it does on tobacco.

The appeal and popularity of these products among children and youth is well established, and our existing concerns are now sharply magnified by reports of hospital admissions related to the use of vape products. We are pleased that you have publicly expressed your own concerns about the prevalence and possible health consequences of vaping, particularly as they affect our youth, and we hope you agree that placing stronger restrictions on vape promotion is in fact one of the most obvious solutions to this emerging issue.
I would be pleased to meet with you to discuss our positions in more detail. Please contact Loretta Ryan, Executive Director, aPHa at 647-325-9594 or loretta@alphaweb.org to make arrangements for a meeting.

Yours sincerely,

Carmen McGregor
aPHa President

COPY:  Hon. Michael Tibollo, Associate Minister, Mental Health and Addictions
       Helen Angus, Deputy Minister, Ministry of Health
       Dr. David Williams, Chief Medical Officer of Health
       Dianne Alexander, Director, Health Promotion and Prevention Policy and Programs Branch
       Nina Arron, Director, Health Protection and Surveillance Policy and Programs Branch
October 31, 2019

The Honourable Christine Elliott
Minister of Health
Hepburn Block 10th Floor
80 Grosvenor Street
Toronto ON M7A 1E9

Re: Display and Promotion of Vaping Products

On September 27, 2019 at a regular meeting of the Board for the Grey Bruce Health Unit, the Board considered the attached correspondence from Simcoe Muskoka District Health Unit regarding implementing restrictions on the display and promotion of vaping products. The following motion was passed:

GBHU BOH Motion 2019-79

Moved by: Anne Eadie Seconded by: Brian Milne
“THAT, the Board of Health support the correspondence from Simcoe Muskoka District Health Unit regarding Restrictions on the Display and Promotion of Vaping Products.” Carried

Sincerely,

Mitch Twolan
Chair, Board of Health
Grey Bruce Health Unit

Encl.

Cc: Honourable Michael Tibollo, Associate Minister of Mental Health and Addictions
Dr. David Williams, Chief Medical Officer of Health
Alex Ruff, MP Bruce-Grey-Owen Sound
Terry Dowdall, MP Simcoe-Grey
Benn Lobb, MP Huron-Bruce
Association of Local Public Health Agencies
Ontario Health Units
September 18, 2019

Honourable Ginette Petitpas Taylor
Minister of Health of Canada
House of Commons
Ottawa, ON K1A 0A6

Honourable Christine Elliott
Minister of Health 10th Floor, Hepburn Block
80 Grosvenor Street
Toronto, Ontario M7A 2C4

Dear Ministers:

On September 18, 2019 the Board of Health for the Simcoe Muskoka District Health Unit approved a motion to write to the Ontario and the federal Ministers of Health calling for stringent restrictions on the display and promotion of vaping products and to ban flavoured e-cigarettes to help prevent the further uptake of vaping (and with it, the potential risk of smoking commencement) by youth.

Vaping has been rapidly increasing in our youth. A 74% increase in vaping among youth aged 16-19 in Canada was reported from 2017 to 2018 (jumping to 14.6% from 8.4%).\(^1\) Cigarette smoking in the same period increased 45% to reach 15.5% of youth in this age group from 10.7% a year earlier. This is a concerning given that surveys initiated prior to 2018 had reported an ongoing decline in youth smoking; a finding which is consistent with the conclusions of research suggesting that vaping increases the risk of smoking in youth.\(^2\) Research has also demonstrated that marketing of vaping products at retail stores is associated with youth and young adult initiation of vaping.\(^3\)

Although vaping is likely to be less harmful than smoking, vaping is not harm free. Vaping can cause ear, eye, and throat irritation. The fine particles and chemicals that are inhaled into the lungs can aggravate existing lung conditions making it harder to breath.\(^4\) The risk of heart attack increases with vape use and using both cigarettes and e-cigarettes increases this risk further.\(^5\) Nicotine addiction is a significant concern associated with youth vaping. Nicotine can change how the teenage brain develops

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\(^3\) Loukas, A, Paddock, M., Li, S., Harrell, M., Pasch, E., Perry, C (2019) Electronic Nicotine Delivery Systems Marketing and Initiation Among Youth and Young Adults
affecting cognitive functions like memory and concentration as well as impulse control and can cause behavioural problems.6

A number of serious lung issues associated with vaping occurring in the United States with an unknown etiology has also recently been reported. Health Canada warned in a recent safety alert that vaping products can carry a risk of pulmonary illness. This follows five recent deaths in the U.S. that have been linked to vaping. Health Canada reported that no similar pulmonary illness incidents have been reported in Canada, but the agency is in communication with the Centre for Disease Control (CDC) who is investigating 450 cases in 33 states which involve e-cigarettes or other vaping product use.7

Complicating matters further in lieu of regulation and restriction are flavoured vapour products. There are over 7000 flavours of e-juice available including candy and fruit flavoured varieties with names that appeal to youth.8 There is a strong body of evidence to support that flavours attract youth to e-cigarette use where research concludes that flavour influences youth to try and buy e-cigarettes and the appeal of ads promoting flavours is linked to uptake of vaping by youth.9

Presently, there are limited federal restrictions associated with the marketing and promotion of e-cigarettes. Unlike cigarettes, vaping advertising is currently permitted on mainstream media including television, radio, newspapers, outdoor signs, print and billboards. There are some regulations to protect youth related to the sale, promotion and flavour of vaping products; however, these regulations are clearly not adequate to stem the increasing uptake of vaping by youth.

Provincially, the Smoke-Free Ontario Act, 2017 (SFOA, 2017) originally put comprehensive restrictions on the display and promotion of vaping products similar to tobacco. However, those restrictions were not implemented by the Ontario provincial government before the SFOA, 2017 was enacted. As a result, point of sale display and promotion of vapour products at corner convenience stores, gas stations and grocery chains is widespread and promotional materials from posters to three-dimensional cutouts and packaging displays.

In order to prevent a further increase of vaping among youth and non-smokers in Simcoe Muskoka and to prevent the associated possible risk of cigarette smoking uptake, bans on the display and promotion of vapour products at both the Federal and Provincial level are required immediately. Provincially, the Smoke-Free Ontario Act regulations need to be strengthened to include a ban on flavoured vape products, as well on the display and promotion of vapour products mirroring the ban on tobacco products. Federally, the Tobacco and Vaping Products Act (TVPA) should also be revised to ban display, promotion and advertising, also mirroring the restrictions on tobacco in the TVPA.

7 https://www.cdc.gov/tobacco/basic_information/e-cigarettes/severe-lung-disease.html
Thank you for your attention to this very important matter for the protection of the health of our youth.

Sincerely,

ORIGINAL Signed By:

Anita Dubeau
Board of Health Chair

Cc: Ontario Boards of Health
    Association of Local Public Health Agencies
    Ontario Public Health Association
    Ontario Tobacco Research Unit
    Ontario Campaign for Action on Tobacco
    Municipal Councils of Simcoe Muskoka
    Members of Parliament in Simcoe Muskoka
    Members of Provincial Parliament in Simcoe Muskoka
    Central Local Health Integration Network
    North Simcoe Muskoka Local Health Integration Network