

From: Elizabeth Milne
To: allhealthunits@lists.alphaweb.org
Subject: Strengthened Measures to Limit Youth Access, Appeal and Advertising of Vaping Products
Date: November 25, 2019 3:46:26 PM
Attachments: [image001.jpg](#)
[MLHU-vaping-2019-10-17-report-059-19.pdf](#)

ATTENTION: ONTARIO BOARDS OF HEALTH

At its meeting on October 17, 2019 the Middlesex-London Board of Health voted to send a copy of the attached report, and its appendices, to local members of the federal and provincial parliaments, and to Ontario Boards of Health.

Kind regards,
Elizabeth Milne

Elizabeth Milne

Executive Assistant to the Board of Health and Communications Coordinator
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TO: Chair and Members of the Board of Health

FROM: Christopher Mackie Medical Officer of Health / CEO

DATE: 2019 October 17

COLLABORATIVE ACTION TO ADDRESS VAPING CONCERNS

Recommendations

It is recommended that the Board of Health:

1. *Receive Report No. 059-19 re: “Collaborative Action to Address Vaping Concerns”;*
2. *Endorse the HEAL Youth Advisory Council’s (HEALYAC) position statement “Vaping in Schools and Student Health,” attached as [Appendix A](#), expressing its support of youth advocacy on vaping;*
3. *Submit a letter, attached as [Appendix B](#), along with the HEALYAC’s position statement, to the Tobacco Control Directorate of Health Canada and the federal Minister of Health, expressing its support for strengthened measures to limit youth access, appeal, and advertising of vaping products;*
4. *Submit a letter, attached as [Appendix C](#), along with the HEALYAC’s position statement, to the Ontario Minister of Health, expressing its support for strengthened measures to limit youth access, appeal, and advertising of vaping products; and,*
5. *Send a copy of this report and its appendices to local members of the provincial and federal parliaments, and to the Association of Local Public Health Agencies for dissemination to all Ontario boards of health.*

Key Points

- The number of cases of severe pulmonary illness associated with vaping continues to rise across the United States, and investigations are ongoing across the United States and Canada to understand the scope of this issue and the health consequences associated with vaping.
- The Middlesex-London Board of Health has a history of supporting the enactment of strong policy measures to help prevent the initiation of vaping product use and to promote a smoke-free and vapour-free culture.
- Western University’s Human Environments Analysis Laboratory Youth Advisory Council (HEALYAC) identified vaping as one of the most important health issues facing youth in the London community, and created a position statement (attached as [Appendix A](#)) highlighting recommendations for action.
- Due to growing concerns related to the health consequences of vaping and the uptick in youth vaping across Canada, Health Unit staff prepared letters for Board of Health approval ([Appendices B](#) and [C](#)) to express its support for strengthened measures to limit youth access, appeal, and advertising of vaping products.

Growing Concerns Related to Health Harms Associated with Vaping

The number of cases of severe pulmonary illness associated with vaping continues to rise across the United States. According to the Centres for Disease Control and Prevention (CDC), as of October 3 there were 18 confirmed deaths and more than 1,000 cases of illness under investigation, affecting almost every state. At the time of writing of this report, the source of these illnesses remains unclear; however, according to the CDC, chemical exposure is likely the cause, with no consistent product, substance, or additive being identified.

While investigations are ongoing in the United States, the Public Health Agency of Canada and the Council of Chief Medical Officers of Health have convened a federal, provincial, and territorial task group to develop a uniform approach to identifying and reporting cases of severe pulmonary illness related to vaping. With the growing number of cases under investigation across Canada and the United States, the reporting of confirmed and probable cases will provide information necessary to understand the scope of this issue and the health consequences associated with vaping. Health Unit staff will continue to monitor this situation.

Vaping in Schools and Student Health

Public Health Nurses from the Child Health and Young Adult teams, the Health Unit's Enforcement Officers, and the Vaping Prevention Health Promoter have been working in collaboration with Southwestern Public Health staff to support school administrators in their efforts to address the increased use of vaping products by youth. This collaboration is creating a comprehensive vaping strategy that includes staff education, vaping curriculum supports, in-school vaping awareness and educational activities for students, cessation supports for students, parent outreach, and enforcement. Implementation of a public awareness campaign, using social media and targeted paid advertisements, is planned for later this fall in partnership with health units from the Southwest Tobacco Control Area Network.

In 2018, Western University's Human Environments Analysis Laboratory (HEAL) established a Youth Advisory Council (HEALYAC) with the goal of integrating youth voices and perspectives into research. The HEALYAC is comprised of fourteen high school students aged 13 to 18, representing diverse communities within the City of London, who work collectively toward the goal of improving the health of young people through authentic collaboration and participatory research with the HEAL. In 2019, the HEALYAC identified vaping as one of the most important health issues facing youth in the London community and suggested that youth input would strengthen future actions aimed at minimizing vaping among young people. In order to share their concerns with stakeholders and community members, the HEALYAC collectively wrote a position statement (attached as Appendix A) that provides an overview of the problem of vaping in schools and advances several key recommendations to address the issue. Leveraging its strong relationships with school and community partners, the Health Unit intends to work in partnership with the HEALYAC to support the development and implementation of a "by youth, for youth" vaping prevention campaign to be disseminated through media channels frequented by youth in Middlesex-London in 2020.

Opportunity for Protective Policy Measures through Federal and Provincial Regulation

The Board of Health has a history of supporting the enactment of strong policy measures to prevent the initiation of vaping product use and to promote a smoke-free and vapour-free culture (see reports [016-18](#), [048-18](#), [068-18](#), [026-19](#), and [040-19](#)). Due to growing concerns related to the health harms associated with vapour product use and the uptick of youth vaping across Ontario and Canada, Health Unit staff prepared two letters for Board of Health approval (attached as Appendices B and C) in support of strengthened measures to limit youth access, appeal, and advertising of vaping products. Vapour products that contain nicotine are addictive and alter brain development in youth, including areas of the brain that control memory, concentration, impulse control, and addiction pathways. With a 74% increase in youth vaping and a 45% increase in youth smoking in Canada from 2017 to 2018 ([Report 055-19](#)), and given the growing concerns about the health harms associated with vapour product use, the public health sector should be concerned about growing rates of nicotine addiction among young people following decades of decline in youth smoking rates.

This report was prepared by the Healthy Living Division.



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

The HEALYAC is a Youth Advisory Council (YAC) in London, Ontario, Canada that informs youth-related health research conducted by the Human Environments Analysis Laboratory (HEAL). The HEALYAC represents the diverse voices and perspectives of 14 teenagers from across the city.

POSITION STATEMENT: VAPING IN SCHOOLS AND STUDENT HEALTH

We, the HEALYAC, are concerned about the rising prevalence of vaping in our schools. Easy access to these products leaves all high school students, both those who vape and their peers, vulnerable to the uncertain consequences of vaping. The lack of evidence and awareness involving the health effects of vaping and the impacts of exposure to vaping, is a key health issue facing teenagers in Canada. We are calling for additional research, and immediate implementation of government regulation, improved detection and enforcement in schools, and cessation and coping support for youth

THE PROBLEM

Vaping Enforcement and Exposure

In recent years, vaping products have gained significant traction in Canada [1-2]. Vapes, or e-cigarettes, are becoming especially popular amongst teenagers, particularly in school settings [3-4]. As members of the HEALYAC, we are not only concerned about our daily involuntarily exposure to vaping, but also the distraction that e-cigarette use causes in educational environments. Despite potential consequences, many teens are using vaping products on school property at an alarming rate. This could be attributed to the fact that vaping is largely undetected and restrictions remain unenforced. The undetectable nature of vaping allows for high school students to vape not only on the property surrounding schools, but also in classrooms, gyms, and bathrooms [3,5]. This poses both a distraction and a barrier to learning. We feel that most vaping occurs in areas that are not monitored or have little to no security, including bathrooms. This frequent and involuntary exposure can lead to students feeling pressured by peers to experiment with vaping. Thus, we strongly encourage stricter enforcement in schools to mitigate this issue and reduce the prevalence of vaping in educational settings. Optimizing enforcement and restricting vaping within and around schools would improve adolescent health and foster safe spaces for learning.

Access to Products

The Tobacco and Vaping Products Act regulates the marketing, sale, and use of vaping devices and their associated products in Canada. Legally, only those of majority age (typically 19+) in their province or territory may purchase vaping devices and products. However, teenagers have reported significantly elevated use of nicotine and other products via vaping devices [6-7]. In Canada, users report purchasing their devices from traditional retail outlets, which highlights that the lack of regulatory enforcement enables teenagers to easily access vaping products in their community [8]. In addition, online sales of vaping products in Canada do not require age verification upon purchase, and only include a loosely enforced guideline for age verification on delivery [7]. It is clear the lack of enforcement, and desire to balance regulatory demands, has made it easier for us, and other teenagers, to access vaping devices, and associated nicotine-based products.

Vaping and Mental Health

In our schools, many students experience academic stress and anxiety, and we have noticed that some students are using vaping to cope with these feelings. We are deeply concerned about associated risks with vaping that can lead to nicotine addiction and physical dependence. Those who wish to quit may experience the hardships of withdrawal [9]. Exposure to nicotine can lead to reduced impulse control, and cognitive and behavioural problems [9]. Youth are especially susceptible to its negative effects, as it is known to alter their brain development and can affect memory and concentration [10]. Stress during adolescence is a risk factor for the initiation of nicotine consumption and studies have shown that vaping is a mediator in the decision to start smoking in previously nonsmoking adolescents [11, 12]. Stress during adolescence may further augment the rewarding properties of nicotine and alter behavioral responses to nicotine later in life. In addition, nicotine addiction can exacerbate symptoms of depression and anxiety [13]. Further, given the prevalence of vaping in our schools, we believe that it has not only become a classroom distraction, but has also a new avenue for peer pressure to consume controlled substances.

Lack of Evidence and Awareness Related to Health Impacts of Vaping

There is a lack of scientific evidence available for young people to make informed decisions about vaping. The liquid solution used in vapes contains several ingredients that are potentially harmful and addictive, including nicotine, propylene, and glycol. Vaping devices can also be used to consume marijuana or cannabis products [3]. While the long-term consequences of inhaling vaping products are unclear, recent studies provide preliminary evidence related to the health effects of nicotine and tobacco use. For example, studies show that daily e-cigarette use is associated with an elevated risk of heart attack [14], and with regard to youth and adolescents specifically, nicotine use has been found to negatively affect brain development [10,15,16] and lead to tobacco smoking initiation [17]. Furthermore, the risk that vaping fumes may pose to bystanders is unknown. Our concerns are that teens are either unaware of the potential health effects of vaping or that the uncertainty of the evidence around vaping is leading to an assumption that there are no negative consequences.

Given the serious consequences that vaping can have on youth's health and wellbeing, we believe immediate action is necessary. As representatives of youth in our community, we propose the following recommendations to address this complex public health issue.

RECOMMENDATIONS

Conduct Longitudinal Research

Although research is limited on the health impacts of vaping, we believe there is enough evidence to justify efforts to prevent the use of vaping products by youth. The long-term safety of inhaling some of the chemicals found in vaping liquid is unknown and should continue to be assessed. Identifying the health impacts of these chemicals and the differences between adolescents and adults in response to vaping, particularly on measures associated with nicotine addiction and mental health, is critical to creating effective prevention and reduction programs and policies.

Promote Mental Health and Coping Strategies

Vaping is not intended for youth and non-smokers, nor is it an appropriate tool for stress management. Early addiction to nicotine can exacerbate symptoms of depression and alter brain development. Since stress is often cited as a reason to engage in vaping, effective stress management programs that are age appropriate should be created. Conversations with youth should include facts of mental health issues and consequences of nicotine addiction that may arise from vaping. We should have improved access to support and healthier alternatives to vaping to cope with stress and anxiety. Teachers, school administrators, parents, and students should be provided with information on effective vaping prevention and cessation strategies, as well as mental health resources for teens.

Control Access to Products

In no case should those younger than 19 years be able to access vaping devices and associated products. We recommend that local, provincial, and federal regulations be modified to introduce strict marketing rules, and new safeguards on the online purchase of vaping products.

Local: Local governments should dedicate resources to the monitoring and inspection of retail outlets selling vaping devices and their products. In addition, the sale of vaping devices and their products should be banned at establishments frequented by youth.

Provincial: The health curriculum should be modified to discourage vaping and inform students about the negative health effects of using vaping-associated products. The province should work with the federal government to establish a secure electronic identity system to verify the age of online purchasers of vaping products.

Federal: Government agencies should invest in research to understand the health effects and uptake of vaping among young people, and work with local and provincial governments to ensure enforcement of existing regulations on vaping.

Develop Youth-Oriented Educational Campaigns

Given the overall uncertainty and lack of awareness surrounding vaping, we emphasize that, in addition to policy and government action to restrict vaping, greater efforts should be made to educate students and the wider public about the potential health-related consequences. We feel that the current messaging from the government about the consequences of vaping need to be more youth oriented. We recommend that health education campaigns about vaping be developed with content and messaging relevant to and targeted at youth, and subsequently disseminated through channels and platforms accessed by youth.

Improve Enforcement and Reduce Exposure

We would like to see vaping prohibited on school property. We recommend that education infrastructure is a key area for intervention, specifically in relation to detection, training and awareness, and security.

Detection: Infrastructure additions, such as vape detection sensors, could reduce the prevalence of vaping in schools and deter teens from vaping on school property.

Training: Training for teachers and school staff to recognize and detect the presence of vaping on school property could prove to be an effective means for enforcing vaping regulations in schools.

Security: Additional security and monitoring in educational settings may curb the use of vapes and e-cigarettes. Regular supervision of common 'places of usage', or areas that have high instances of vaping (i.e., gyms, hallways, classrooms, libraries) is needed.

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October 18, 2019

James Van Loon, Director General
Tobacco Products Regulatory Office
Tobacco Control Directorate, Controlled Substances and Cannabis Branch
Health Canada
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Ottawa, Ontario K1A 0K9
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Dear Mr. Van Loon;

The Middlesex-London Board of Health and its staff share Health Canada's concerns regarding the increase in vapour product use by young people in Canada. The Board of Health applauds Health Canada's commitment to work with provincial and territorial partners to enhance national collaborative and cooperative efforts to reduce youth vaping. With the growing concerns related to the health consequences of vaping, and the ongoing investigation of severe pulmonary illnesses across the United States and Canada, the need for strengthened policy measures to limit youth access, vapour product appeal and advertising is amplified.

At its meeting on October 17, 2019, the Middlesex-London Board of Health heard a delegation from Western University's Human Environments Analysis Laboratory Youth Advisory Council (HEALYAC). HEALYAC is comprised of 14 high school students (13-18 years) representing diverse communities within the city of London. The HEALYAC identified vaping as one of the most important health issues facing youth in the London community. To share their concerns with public health and other community stakeholders, they wrote the attached Position Statement, "*Vaping in Schools and Student Health*". The Board of Health and its staff share the concerns that are outlined in the HEALYAC position statement, which is attached for your consideration, and commend them for their youth advocacy.

With a 74% increase in youth vaping and a 45% increase in youth smoking from 2017 to 2018 in Canada ([Hammond, D. et al., 2019](#)), in addition to growing concerns about the health harms associated with vapour product use, the Board of Health is concerned about the growing rates of nicotine addiction in young people, after decades of decline in youth smoking rates. To reduce youth access, appeal and advertising of vapour products, please consider the following regulatory measures under the *Tobacco and Vaping Products Act*:

- Align the restrictions for vaping product advertising with the approach taken to regulate the promotion and advertising of tobacco products: promotion of vaping products should be prohibited at premises where vape products are sold and youth are permitted access, in/at all places of entertainment, and on all forms of broadcast media, including online advertisements.
- Restrict the retail display of vaping products, as well as all images and models of these products in places where children and youth have access.
- Strengthen the current approach to regulating flavoured e-substances to include tighter prohibitions on the manufacturing and sale of e-substance flavours that are attractive to youth and adolescents, with an overall reduction/market cap on the number of flavours available for sale in Canada.
- The nicotine concentration level for e-substances should not exceed 21 mg/ml, which is in alignment with the European Union Tobacco Products Directive, which states that this concentration allows for delivery of nicotine that is comparable to a standard cigarette.
- Use the same approach that has been applied to tobacco and cannabis products, by enacting plain and standardized vapour product design and packaging requirements, and the enactment of stringent health warnings.

- Strict age-verification measures should be required for online sales, including age-verification at time of purchase (photo technology of government-issued ID) and proof of legal age at delivery. Online sales should be enforced by Health Canada.
- Vaping products are not regulated as an approved cessation aid in Canada; therefore, a prohibition on the use of cessation and health claims by manufacturers, distributors, and retailers about vaping products is warranted.
- Product manufacturers should be held to the same level of accountability and scrutiny as tobacco product manufacturers, through the enactment of vapour product information and reporting regulations.
- Dedicate research funding to better understand the potential benefits and risks associated with the use of vapour products. Research findings can be used to inform the development of future regulations.

Growing concerns related to health harms associated with vaping product use and the uptick of vaping across Ontario and Canada is a significant public health concern, and we thank you for your consideration and continued efforts to develop and refine health protective measures that will help to safeguard the health of our community. The Middlesex-London Board of Health and its staff are committed to working with Health Canada to address this emerging issue of public health concern.

Sincerely,

Trish Fulton, Chair
Middlesex-London Board of Health

Attachments:

Middlesex-London Board of Health Report 059-19, "Collaborative Action to Address Vaping Concerns"
HEALYAC Position Statement: Vaping in Schools and Student Health

cc: The Honourable Ginette Petitpas Taylor, Minister of Health
hcminister.ministresc@canada.ca

Mr. Peter Fragiskatos, MP London North Centre
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Ms. Irene Mathyssen, MP London-Fanshawe
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Ms. Karen Vecchio, MP Elgin-Middlesex-London
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October 18, 2019

The Honourable Christine Elliott
Deputy Premier and Minister of Health
Ministry of Health and Long-Term Care
777 Bay Street, 5th Floor
Toronto, Ontario M7A 2J3
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Dear Minister Elliott;

The Middlesex-London Board of Health and its staff share the Ministry of Health's concerns regarding the increase in vapour product use by young people in Ontario and the growing concerns related to severe pulmonary illness related to vaping. The Board of Health commends you for issuing the Minister's Order under section 77.7.1 of the *Health Protection and Promotion Act*, and for the work that is being done collaboratively with the Public Health Agency of Canada and the Council of Chief Medical Officers of Health, to establish a uniform approach to identifying and reporting cases of severe pulmonary illness related to vaping. With the growing number of cases under investigation across Canada and the United States, the reporting of confirmed and probable cases will provide information necessary to understand the scope of this issue and the health consequences associated with vaping.

At its meeting on October 17, 2019, the Middlesex-London Board of Health heard a delegation from Western University's Human Environments Analysis Laboratory Youth Advisory Council (HEALYAC). HEALYAC is comprised of 14 high school students (13-18 years) representing diverse communities within the city of London. The HEALYAC identified vaping as one of the most important health issues facing youth in the London community. To share their concerns with public health and other community stakeholders, they wrote the attached Position Statement, "*Vaping in Schools and Student Health*". The Board of Health and its staff share the concerns that are outlined in the HEALYAC position statement, which is attached for your consideration, and commend them for their efforts to be a voice for young people within our community.

With a 74% increase in youth vaping and a 45% increase in youth smoking from 2017 to 2018 in Canada ([Hammond, D. et al., 2019](#)), in addition to growing concerns about the health harms associated with vapour product use, the Board of Health is concerned about the growing rates of nicotine addiction in young people, after decades of decline in youth smoking rates.

To reduce youth access, appeal and advertising of vapour products, please consider an amendment to the *Smoke-Free Ontario Act, 2017 (SFOA, 2017)* that would prohibit the promotion and advertising of vaping products in/at places where vaping products are sold and youth have access. In Middlesex-London, there are electronic screen ads, lit display cases, signs affixed to gas pumps and even 7-foot tall stand up displays at gas stations and convenience stores across our jurisdiction. The promotional materials use slogans like "Bold and Stylish", "Genius", "Experience the Breakthrough – make the switch", and "You've Got to Try it", which are attractive and enticing to young people, perpetuating misinformation that these products are safe to use without risk.

Secondly, to reduce youth access to vapour products from retailers with a history of routine non-compliance, please consider amending Section 22 of the *SFOA, 2017* to include vapour product sales offences. The automatic prohibition policy measure has proven effective in curbing tobacco sales to persons under the age of 19 years. Age restrictions for the sale and supply of vaping products have been in effect in Ontario since 2016; the inclusion of vaping product sales offences within the automatic prohibition order is timely.

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Growing concerns related to health harms associated with vaping product use and the uptick of vaping across Ontario and Canada is a significant public health concern, and we thank you for your consideration and continued efforts to develop and refine health protective measures that will help to safeguard the health of our community. The Middlesex-London Board of Health and its staff are committed to working with the Ministry of Health and the Ontario Government as a whole, to address this emerging issue of public health concern.

Sincerely,

Trish Fulton, Chair
Middlesex-London Board of Health

Attachments:

Middlesex-London Board of Health Report 059-19, "Collaborative Action to Address Vaping Concerns"
HEALYAC Position Statement: Vaping in Schools and Student Health

cc: The Honourable Jeff Yurek, Minister of Environment, Conservation and Parks, MPP Elgin-Middlesex-London
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