



Ottawa Council on
Smoking or Health

Conseil d'Ottawa sur le
tabagisme ou la santé

August 17, 2016

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

Re: Consultation on Plain and Standardized Packaging for Tobacco Products

The Ottawa Council on Smoking or Health (OCSH) is writing in support of plain and standardized packaging for tobacco products in order to protect youth and to help smokers quit.

The OCSH is a volunteer organization established in 1978. Our goals are to: create a social environment where non-smoking is the norm; to assist in establishing smoke-free environments; to prevent youth from starting to smoke; to encourage smokers to quit; and to advocate for better smoking cessation resources.

We therefore support **the strongest possible measures to regulate the appearance, shape, and size of ALL tobacco packages and ALL tobacco products, including:**

- Prohibiting flip top format packaging, and requiring **all** tobacco packages to be in the slide and shell format in order to accommodate larger health warnings.
- A single, unattractive colour for **all** tobacco products and packages.
- A standard font type, size, and colour for product brand names displayed on packages.
- A standard shape and size for cigarette packages and single cigar tubes.
- Prohibiting brand elements and promotions on packages.
- Limiting the number of words in the brand name displayed.
- Prohibiting space fillers in cigarette packages.
- Regulating the thickness of cigarette package walls.
- Regulating the dimensions of the cigarette itself (e.g. length and diameter).
- Prohibiting filter colours or designs (e.g. grooves, hole, or recess) in cigarette filters.
- Banning slims and super slims cigarettes which are attractive to women.

Since Canada is a party to the World Health Organization Framework Convention on Tobacco Control, we urge Health Canada to set even higher standards for plain packaging than those that are currently used in other countries, including Australia, the United Kingdom, Ireland, and France.

A new scientific study of the Canadian population found that unhealthy behaviours, including smoking, reduced life expectancy by six years.¹ The study also found that “smoking, by itself, contributed 32% to 39% of the difference in life expectancy across social groups.”²

Health Canada must adopt, without delay, the strongest possible tobacco control strategies to:

- Reduce smoking rates, especially among youth;
- Reduce the burden of tobacco-related diseases;
- Prevent premature deaths; and
- Reduce health care costs.

Respectfully submitted,

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REFERENCES

¹ DG Manuel, R Perez, C Sanmartin, M Taljaard, et al. Measuring Burden of Unhealthy Behaviours Using a Multivariable Predictive Approach: Life Expectancy Lost in Canada Attributable to Smoking, Alcohol, Physical Inactivity, and Diet. *PLOS Medicine*. August 16, 2016.
<http://journals.plos.org/plosmedicine/article?id=10.1371/journal.pmed.1002082>

² Ibid.