



July 24, 2018

Plain and Standardized Packaging Division
Tobacco Products Regulatory Office
Tobacco Control Directorate
Healthy Environments and Consumer Safety Branch
Health Canada
150 Tunney's Pasture Driveway
Ottawa, ON K1A 0K9
Email: hc.pregs.sc@canada.ca

Dear Sir or Madam:

Re: Proposed Plain Packaging Regulations for All Tobacco Products

The Ottawa Council on Smoking or Health (OCSH) commends Health Canada for proposing the strongest plain packaging regulations in the world.

The OCSH supports all of the proposed plain packaging regulations for all tobacco products, including:

- Eliminating brand colours and logos on all tobacco packages.
- Banning branding, graphics, logos, and colours on individual cigarettes.
- Requiring the same drab brown colour (Pantone colour 448C) for all tobacco packages. This is the same colour used for tobacco packages in other countries that have adopted plain packaging.
- Requiring a slide and shell format for all cigarette packages to increase the size of the health warnings.
- Banning slim and superslim cigarettes which the tobacco industry uses to target young women and girls.
- Banning long cigarettes.

Since Canada has delayed implementing plain packaging for 24 years,¹ we urge the federal government to implement these regulations without any further delay.

Lastly, the OCSH strongly recommends that the federal government enact additional tobacco control measures to reduce tobacco use to 5% of the Canadian population by 2035. We urge the federal government to update the *Non-Smokers' Health Act* by prohibiting the use of all weeds and substances that can be lit, heated, burned or combusted (e.g., tobacco, electronic cigarettes, cannabis, hookahs, and heat-not-burn products) in all indoor and outdoor federal government workplaces and public places before the recreational use of cannabis is legalized on October 17, 2018.

The OCSH was disheartened to learn that Ottawa Bluesfest in Ottawa created a designated smoking area for tobacco and medical cannabis users for the first time this year.² This is a step backwards, as Ottawa Bluesfest adopted a 100% smoke-free policy in 2013 in response to public complaints about second-hand smoke from tobacco and cannabis products.³ However, since Ottawa Bluesfest is held on NCC land in front of the Canadian War Museum, it does not have to adhere to the City of Ottawa's smoke-free outdoor bylaws. Ottawa Bluesfest's new policy risks the health and safety of the public, festival workers and volunteers. It also confuses the public because Ottawa Bluesfest organizers had declared the main concert bowl a smoke-free zone while permitting smoking adjacent to the main concert stage. The OCSH has already received complaints about second-hand smoke exposure in the area that was designated smoke-free. We are also concerned that this new policy on NCC land will set a precedent, given the lack of federal legislation to protect the public and workers on federal lands from second-hand smoke from tobacco and cannabis products, and from electronic cigarette vapour.

Thank you for considering our comments.

Respectfully submitted,

Carol McDonald, President
Carmela Graziani, Secretary
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www.smokefreeottawa.com

REFERENCES

¹ Physicians for a Smoke-Free Canada. Plain and standardized tobacco products and packaging move closer to reality in Canada. Blog, June 22, 2018.
http://smoke-free-canada.blogspot.com/2018/06/plain-and-standardized-tobacco-products.html?utm_source=feedburner&utm_medium=email&utm_campaign=Feed%3A+PhysiciansForASmoke-freeCanada+%28Physicians+for+a+Smoke-Free+Canada%29

² "Ottawa Bluesfest creates smoking zone for medical marijuana and cigarettes," Lynn Saxberg, The Ottawa Citizen, July 4, 2018.
<http://ottawacitizen.com/news/local-news/ottawa-bluesfest-creates-marijuana-smoking-zone-for-medical-users>

³ The Ottawa Council on Smoking or Health and the Academy of Medicine Ottawa Congratulate the RBC Royal Bank Bluesfest and the National Capital Commission on their New Smoke-Free Policy. News Release, January 21, 2013.
http://www.smokefreeottawa.com/uploads/1/1/7/4/11742147/ocsh_amo_news_release_nnsn_2013_bluesfest_ncc_smoke-free.pdf