



February 11, 2019

Mr. James Van Loon  
Director General  
Tobacco Control Directorate  
Controlled Substances and Cannabis Branch  
Health Canada

Email: [hc.pregs.sc@canada.ca](mailto:hc.pregs.sc@canada.ca)

Dear Mr. Van Loon:

**Re: Consultation on Potential Measures to Reduce the Impact of Vaping Products Advertising on Youth and Non-users of Tobacco Products**

I am writing on behalf of the Ottawa Council on Smoking or Health (OCSH) regarding the consultation on vaping products advertising.

The OCSH was established in 1978 as a volunteer organization with the goals of: creating an environment where non-smoking is the norm; assisting in establishing smoke-free environments; encouraging smokers to quit; and advocating for better smoking cessation resources.

The OCSH recommends:

**A. Placement of advertisements:**

**1. Point of sale:**

- a. Prohibiting vaping product advertisements at all points of sale, including online.
- b. Allowing signs indicating the availability and price of vaping products under certain conditions.
- c. Allowing catalogues or pamphlets that provide information on vaping product brands at point of sale, provided that they are not publicly displayed and that they are only made available to adult customers upon request.
- d. These restrictions **should apply** to all points of sale, regardless of whether or not youth have access (e.g. a vape shop that does not allow youth on its premises or its website).

**2. Public places:** Prohibiting all vaping product advertisements in all public places, regardless of whether they are considered youth or adult venues.

**3. Broadcast Media:** Prohibiting all vaping product advertising on broadcast media.

**4. Publications:** Prohibiting all vaping product advertising in publications, including online websites and social media platforms.

**B. Content of advertisements:**

1. Placing health warnings on all vaping products, regardless of whether or not they contain nicotine.
2. Applying plain packaging requirements for all tobacco products to all vaping products.

**C. Other forms of retail production:** Eliminating all displays of vaping products at all points of sale.

The OCSH urges Health Canada to take immediate action on this serious public health threat and to prohibit vaping products advertising in the same way that it prohibits tobacco advertising.

Thank you for considering our comments.

Respectfully submitted,

Carol McDonald  
Ottawa Council on Smoking or Health

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**REFERENCES**

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2. American Psychological Association. Wilcox B L, Kunkel D, Cantor J Dowrick, Linn S, Palmer E. Report of the APA Task Force on Advertising and Children, 2004.  
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