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**Re: Consultation on Proposals for the Regulation of Vaping Products**

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

The OCSH is a volunteer organization that was 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.

The OCSH supports:

- Health Canada's regulatory proposals on labelling which would apply to all vaping products.
- Clear and accurate labelling of the concentrations of nicotine.
- Proposal No. 1, which would require nicotine content to be displayed in milligrams/millilitres.
- Proposal No. 2, which would consider a product to contain nicotine if nicotine is present at a concentration of 0.1 mg/ml or higher.
- Proposal No. 3, which would require that vaping products that contain nicotine display a warning about the health risks.
- Proposal No. 4, which would require that products that contain a vaping liquid display a complete list of ingredients in descending order by weight.

- Proposal No. 5, which would require manufacturers to report information to Health Canada on all vaping products and activities of companies that manufacture, sell and market vaping products.
- Proposal No. 6, which would require manufacturers of vaping products to provide supplementary information to Health Canada.
- Proposal No. 7, which would provide manufacturers of vaping products 30 days to address any deficiency in the reporting of information prescribed by the regulations.
- Proposal No. 8, which would require manufacturers of vaping products to maintain all records and documents used to prepare their information reports for a period of six (6) years after the end of the year to which the document relates.
- Proposal No. 9, which would require manufacturers, retailers and others to use relative risk statements in vaping products promotions.
- Proposal No. 10, which would limit youth exposure to information and brand-preference advertising of vaping products; limit advertising in or near locations that are attended predominantly by youth, such as schools, parks, recreational and sporting facilities; and limit advertising in certain media.
- Require that all vaping products be brought under the Canada Consumer Product Safety Act, 2001 in order to comply with labelling requirements.

#### **OCSH Recommendations:**

In addition to these proposals, the OCSH strongly recommends that Health Canada:

- Place the same restrictions on vaping product advertising as tobacco product advertising.
- Require the use of relative risk statements that are developed independently from manufacturers, retailers and promoters of vaping products (as per Proposal No. 9).
- Continue to monitor the relative health risks of vaping products since the harmful consequences of vaping products continue to emerge.<sup>1, 2,3,4,5,6,7,8</sup>
- Consider the potential harm to bystanders from second-hand electronic cigarette vapour.<sup>9,10</sup>
- Consider the health risks to youth and to other individuals who use electronic cigarettes to vape illicit drugs, including fentanyl,<sup>11 12,13</sup> which is contributing to the opioid crisis.

Lastly, Health Canada's proposals do not address the hand-to-mouth behaviour associated with the use of vaping products which, aside from the addictive nature of nicotine, forms part of the habitual pattern of smoking, whether it be electronic cigarettes, tobacco cigarettes or rolled cannabis cigarettes (also known as joints or blunts).

Thank you for considering our comments.

Respectfully submitted,

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