

Restriction of the use of additives in tobacco

Canadian Medical Association Submission to Health
Canada's *Notice of proposed order to amend the
schedule to the Tobacco Act*

November 10, 2014



The Canadian Medical Association (CMA) is the national voice of Canadian physicians. Founded in 1867, CMA's mission is to help physicians care for patients.

On behalf of its more than 80,000 members and the Canadian public, CMA performs a wide variety of functions. Key functions include advocating for health promotion and disease prevention policies and strategies, advocating for access to quality health care, facilitating change within the medical profession, and providing leadership and guidance to physicians to help them influence, manage and adapt to changes in health care delivery.

The CMA is a voluntary professional organization representing the majority of Canada's physicians and comprising 12 provincial and territorial divisions and 51 national medical organizations.



The Canadian Medical Association (CMA) is pleased to provide this submission in response to Health Canada's *Notice of proposed order to amend the schedule to the Tobacco Act*¹, from October 14, 2014, on the restriction of the use of additives.

Canada's physicians have been working for decades toward the goal of a smoke-free Canada. The CMA issued its first public warning concerning the hazards of tobacco in 1954 and has continued to advocate for the strongest possible measures to control its use.

Background

Flavoured tobacco products include candy or fruit flavoured products including cigarillos, water pipe tobacco, smokeless tobacco and blunt wraps. They come in flavours that are appealing to youth such as chocolate, mint, cherry, peach, or strawberry. Flavouring makes the tobacco products more palatable to youth and young adult smokers because they have a lower tolerance for irritation and an underdeveloped taste for tobacco smoke.² Menthol is a long standing and common flavour used in cigarettes and is used to reduce the harshness of cigarette smoke. It is the most popular flavour among youth. Almost three out of 10 Canadian youth who smoked cigarettes in the last 30 days (29 per cent) reported smoking menthol cigarettes.³

Tobacco Use and Youth

While tobacco use has declined in Canada we must remain vigilant in our efforts to reduce smoking rates. Today 16 per cent of Canadians continue to smoke on a regular basis and physicians are particularly concerned about the smoking prevalence among young adults and youth with 20 per cent of those aged 20-24, and 11 per cent of youth aged 15–19 currently smoking on a regular basis.⁴

Flavoured tobacco products, with their appeal to young Canadians are a major threat to the health and well-being of our youth. A recent report, *Flavoured Tobacco Use: Evidence from Canadian Youth based on the 2012/13 Youth Smoking Survey*, shows that young people are using flavoured tobacco products at high levels. Results show that 50 per cent of high school students in Canada who used tobacco products in the previous 30 days used flavoured tobacco products.⁵

Previous Amendments Regarding Flavouring Agents

The CMA supported efforts of the federal government in 2009 to limit the addition of flavouring agents to tobacco products through the 2010 *Act to Amend the Tobacco Act*. But the Act did not cover all tobacco products and it excluded menthol as a flavouring agent. Manufacturers have been able to modify the weight and packaging of their products to technically comply with the Act while they continue to market flavoured products.

CMA Recommendations

It is the CMA's position that the federal government has an important role in smoking cessation and prevention among youth. The CMA supports the proposed extension of the prohibitions on the use of certain flavouring additives in relation to the manufacture and sale of little cigars to cigars weighing more than 1.4 g but less than 6 g.

The CMA remains very concerned that these amendments do not ban menthol flavouring in tobacco products. To that end, the CMA recommends that Health Canada extend its prohibition on flavouring additives to include a ban on the addition of menthol in all tobacco products.

¹ Health Canada. *Notice of proposed order to amend the schedule to the Tobacco Act*. October 14, 2014. Accessed at: http://www.hc-sc.gc.ca/hc-ps/consult/_2014/tobacco-act-loi-tabac/index-eng.php

² Carpenter CM, Wayne GF, Pauly JL, Koh HK, Connolly GN. New cigarette brands with flavors that appeal to youth: Tobacco marketing strategies: Tobacco industry documents reveal a deliberate strategy to add flavors known to appeal to younger people. *Health Affairs* 2005;24(6):1601-1610.

³ Manske SR, Rynard VL, Minaker LM. 2014 (September). *Flavoured Tobacco Use among Canadian Youth: Evidence from Canada's 2012/2013 Youth Smoking Survey*. Waterloo: Propel Centre for Population Health Impact, 1-18. cstads.ca/reports.

⁴ Canadian Tobacco Use Monitoring Survey 2012 , accessed at http://www.hc-sc.gc.ca/hc-ps/tobac-tabac/research-recherche/stat/ctums-esutc_2012-eng.php.

⁵ Manske SR, Rynard VL, Minaker LM. 2014 (September). *Flavoured Tobacco Use among Canadian Youth: Evidence from Canada's 2012/2013 Youth Smoking Survey*. Waterloo: Propel Centre for Population Health Impact, 1-18. cstads.ca/reports.

Minaker L, Manske S, Rynard VL, Reid JL & Hammond D. *Tobacco Use in Canada: Patterns and Trends, 2014 Edition - Special Supplement: Flavoured Tobacco Use*. Waterloo, ON: Propel Centre for Population Health Impact, University of Waterloo.