January 10, 2017

Mathew Cook
Manager, Scientific Regulations Division
Tobacco Products Regulatory Office
Tobacco Control Directorate
Healthy Environments and Safety Branch
Health Canada
hc.pregs.sc@canada.ca

Dear Mr. Cook:

The Canadian Medical Association (CMA) is pleased to provide this response to Health Canada’s Proposed Order Amending the Schedule to the Tobacco Act (Menthol), as found in the Canada Gazette, Part I, on November 5, 2016.

The CMA believes that the federal government has an important role in prevention and smoking cessation, particularly among youth, to end smoking within Canada. As early as 2008, the CMA called for the federal government to ban menthol in tobacco products. In 2014, the CMA submitted a brief to Health Canada on the proposal to amend the Tobacco Act to restrict the use of additives in tobacco products. One of the CMA’s concerns at that time was that the Act excluded menthol as a flavouring agent in tobacco products.

Therefore, the CMA strongly supports Health Canada’s proposed order to prohibit menthol in cigarettes, blunt wraps and cigars. The proposed order has the ability to deter youth from smoking since menthol makes smoking more palatable by masking the harshness of tobacco smoke. This may lead to not only a decline in youth smokers but a decline in the number of smokers in the overall Canadian population as well.

The CMA issued its first warning to the public about the dangers of tobacco in 1954, and we continue to advocate for stronger measures to control smoking. Banning the use of menthol is one step towards achieving this goal.

Sincerely,

Jeff Blackmer, MD, MHSc, FRCPC
Vice-President, Medical Professionalism