



April 5, 2017

Consultations on the Future of Tobacco Control in Canada
Room 1605-626
Mail Stop 0301A
150 Tunney's Pasture Driveway
Ottawa, Ontario
K1A 0K9

Re: Consultation on the renewal of Federal Tobacco Control Strategy

On behalf of the Canadian Medical Association (CMA), I am responding to your request for consultation on renewal of the Federal Tobacco Control Strategy (FTCS) and on the consultation document: "Seizing the Opportunity: The Future of Tobacco Control in Canada." We are pleased that Health Canada is renewing the FTCS.

The most recent Canadian Community Health Survey reports that 17.7% of the population aged 12 and older were current daily or occasional smokers in 2015 (5.3 million smokers); that is down from 18.1% in 2014. The decrease is welcome news but much more needs to be done to ensure the decline continues.

We support the Endgame Summit's goal of less than 5% tobacco use by 2035. It must be recognized that specific sub-populations, such as Indigenous populations, will require different targets along with prevalence reduction goals that recognize their unique circumstances and needs. Tobacco has ceremonial significance among Indigenous peoples; the harm associated with tobacco arises not from its ceremonial use but from its daily, repeated abuse.

As the Summit suggests a renewed strategy must go beyond the traditional approaches of incremental stricter measures by focussing on the activities of the tobacco industry while offering more assistance to those affected by tobacco products. The whole-of-government approach recommended by the Summit and the framework it proposes are essential for the success of the strategy in the long-term.

The CMA believes that despite the reduction in smoking rates, tobacco control remains a priority and should continue to be supported by a sustained, well-funded federal strategy and strong leadership and support from Health Canada, including a coordinated, comprehensive



national cessation strategy. We recommend that the next version of the FTCS make the following initiatives a priority:

- **Pricing** There is abundant evidence that high prices are crucial to discouraging tobacco use, especially among young people who are particularly sensitive to price increases. The Summit's recommendation of a joint pricing strategy developed by Health Canada and Finance Canada that combines substantial excise tax increases and other measures will be key in that regard. As in reducing prevalence, pricing strategies that recognize the unique circumstances and needs of specific sub-populations will need to be developed.
- **Plain and Standardized Tobacco Packaging** The CMA recommends only the "slide-and-shell" style of package be authorized and that the "flip-top" package be removed. This would reduce the permitted style to one standard package and allow for the largest possible surface area to be used to convey health warnings and other health-related information. The CMA also supports a single allowable length of cigarette and that a minimum diameter or width be established. The purpose is to eliminate the sale of "slims" and "super slims" cigarettes to eliminate the possibility of these products as being considered "healthier."
- **Retailing** The CMA recommends tightening the licensing system to limit the number of outlets where tobacco products can be purchased. The more restricted is tobacco availability, the easier it is to regulate.
- **Age of sale** The CMA supports continued health promotion and social marketing programs aimed at addressing the reasons why young people use tobacco, preventing them from starting to use tobacco and encouraging them to quit, and raising their awareness of tobacco industry marketing tactics so that they can recognize and counteract them. The CMA supports raising the minimum age of sale to 21 years.
- **Promotion** Tobacco manufacturers make frequent use of subtle marketing messages to render smoking attractive and glamorous to young people. The CMA supports educational and public relations initiatives aimed at countering these messages. For example, movie classification systems should restrict access by children and youth to films that portray tobacco use and tobacco product placement. The CMA also supports a total ban on promotion, including tobacco-branded tobacco accessories and non-tobacco products.

- **Industry interference** The CMA supports the Endgame Summit's recommendations with respect to preventing the tobacco industry's interference with health policy (i.e., Article 5.3 Guidelines to the Framework Convention on Tobacco Control).

It is the CMA's position that the federal government has a vital role to play in smoking cessation. A fully funded and resourced tobacco control strategy that meets the challenges of the 21st century will help accomplish that goal.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Blackmer", with a long horizontal flourish extending to the right.

Jeff Blackmer, MD, MHSc, FRCPC

Vice-president, Medical Professionalism