

CMA response:

HEALTH CANADA'S CONSULTATION ON NEW HEALTH- RELATED LABELLING FOR TOBACCO PRODUCTS

Date December 14, 2018

The Canadian Medical Association (CMA) is the national voice of Canadian physicians. Founded in 1867, the CMA's mission is to empower and care for patients and its vision is to support a vibrant profession and a healthy population.

On behalf of its more than 85,000 members and the Canadian public, the CMA performs a wide variety of functions. Key functions include advocating for health promotion and disease/injury 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 over 60 national medical organizations.

The Canadian Medical Association (CMA) is pleased to provide this submission in response to Health Canada's Consultation on "New Health-Related Labelling for Tobacco Products - Document for Consultation, October 2018".¹

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 and for the past 30 years we have reiterated our long-standing support for the concept of tobacco products being sold in standardized packages in several briefs and policy statements. Our response will follow the questions posed in the consultation document.

Labelling on Individual Cigarettes

Displaying a warning on individual cigarettes provides another means of conveying important health warnings about the hazards of smoking. The warnings should be like those that will be displayed on the leaflets included in the cigarette packages as well as the packages themselves. They should be of sufficient size, font and colour that will draw the attention of the smoker to the message. They should also be placed as close to the filter end of the cigarette as possible to remain visible for as long as possible.

Health Information Messages

The CMA has always supported educational and public health initiatives aimed at countering tobacco manufacturers messages that would render smoking attractive and glamorous to their customers.² The health information messages and any leaflets included in the package must be of sufficient size, colour and font to prevent manufacturers from using the leaflet as any sort of a promotional platform to minimize, for example, the impact of health warnings on the package exterior.

The CMA supports strongly the concept of tobacco products being sold in standardized packages and we have recommended that only the "slide-and-shell" style of package be authorized and that the "flip-top" package be removed.³ This would allow for the largest possible surface area to be used to convey health warnings and other health-related information. The CMA has recommended that the measurements for the regular and king size cigarette packages be amended to allow for more surface area for warnings and to standardize packaging regulations across all Canadian jurisdictions.⁴

Toxic Statements (Includes Toxic Emissions Statements and Toxic Constituents Statements)

The size, colour and design of new Toxic Statements proposed in the consultation document should be sufficient to be read and easily understood. The Statements should be rotated periodically to include new and updated information related to emissions and toxic constituents.

Connecting Labelling Elements/ Quitline Information

Tobacco manufacturers make frequent use of subtle marketing messages to render smoking attractive and glamorous, especially to young people. The CMA supports packages displaying prominent, simple and powerful health warnings, such as the graphic pictorial warnings, as well as quit tips and information on product content and health risks.² Connecting the themes should help to reinforce the messages being conveyed with these labels. The size, colour, and placement of the proposed quitline and website information should be sufficient to maximize the noticeability of the information on various types of tobacco product packaging.

Percentage of Coverage/Minimum Size of Health Warnings on Tobacco Products Other than Cigarettes and Little Cigars

The amount of space given to the warnings should be sufficient to convey the maximum amount of information while remaining clear, visible, and legible. The warnings should be in proportion to the packaging available, like that of a regular cigarette package.

Labelling for All Tobacco Products that Do Not Currently Require Labels

The CMA supports mandatory health warnings being applied equally to all tobacco products.⁵ If package size allows, Health Warnings, Health Information Messages, and Toxic Statements should all be included. The messages should be relevant to the types of tobacco products they are covering.

Labelling Rotation

The rotation timeframe suggested in the consultation document of 12 to 18 months is a reasonable period.

¹ Government of Canada. *New Health-Related Labelling for Tobacco Products. Document for Consultation* Ottawa: Health Canada; 2018. Available: <https://www.canada.ca/en/health-canada/programs/consultation-tobacco-labelling.html> (accessed 2018 Oct 29).

² Canadian Medical Association (CMA) *Tobacco Control (Update 2008)*. Ottawa: The Association; 2008. Available: <http://policybase.cma.ca/dbtw-wpd/Policypdf/PD08-08.pdf> (accessed 2018 Dec 5).

³ Canadian Medical Association (CMA). *Letter in response to Health Canada's Consultation on "Plain and Standardized Packaging" for Tobacco Products. Potential Measures for Regulating the Appearance, Shape and Size of Tobacco Packages and of Tobacco Products. Document for Consultation*. Ottawa: The Association; 2016. Available: <http://policybase.cma.ca/dbtw-wpd/Briefpdf/BR2016-09.pdf> (accessed 2018 Nov 19).

⁴ Canadian Medical Association (CMA). *Health Canada Consultation on Tobacco Products Regulations (Plain and Standardized Appearance)*. Ottawa: The Association; 2018. Available: <http://policybase.cma.ca/dbtw-wpd/Briefpdf/BR2019-01.pdf> (accessed 2018 Nov 19).

⁵ Canadian Medical Association (CMA). *Policy Resolution BD88-03-64 - Smokeless tobacco*. Ottawa: The Association; 1987. Available: <https://tinyurl.com/y7eynl5q> (accessed 2018 Dec 5).