

A How-To guide on preparing your submission

Presenter:

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A brief introduction

Regulatory development

- **Reducing Youth Access and Appeal of Vaping Products: Potential Regulatory Measures**

April 11 2019 - May 25 2019

Without any explanation, HC lumped the 23000 postcards sent to them and counted them as a single submission.

If we *include* those postcards (as should be the case) over 90% of responses HC received were **opposed** to further restrictions.

Over 24 000 submissions were received in response to this consultation, including 288 unique responses from a variety of stakeholders, 100 template submissions from health professionals, health organizations and the general public, nearly 23 000 postcards and almost 1 450 template emails from people who vape.⁵⁶

The consultation asked Canadians whether flavour categories for which promotion is prohibited (Schedule 3 to the TVPA) should be expanded and/or whether the manufacture and sale of vaping products with certain flavours or flavouring ingredients (Schedule 2 to the TVPA) should be prohibited. This issue garnered the most responses in the consultation. Excluding postcard responses, 66% were supportive of further restrictions, 20% were unclear or did not state a position and 14% were opposed. Few respondents differentiated between prohibiting the manufacture and sale of certain flavours or flavouring ingredients and prohibiting the promotion of certain flavours.

Instrument choice

Health Canada puts forward 4 regulatory options:

- Option 1: Baseline scenario (no further restriction on flavoured vaping products). *STATUS QUO*
- Option 2: Further restrict the promotion of flavoured vaping products by adding fruit flavours to the existing list of prohibited flavours in Schedule 3. *No flavour restrictions, restrictions on promotion of fruit flavours.*
- Option 3: Further restrict the promotion of all flavours other than tobacco in vaping products by amending Schedule 3. *No flavour restrictions, restrictions on promotion of all flavours except tobacco.*
- Option 4: Further restrict the promotion of all flavours other than tobacco or mint/menthol by amending Schedule 3, and prescribe standards on sensory attributes such that vaping products only bring to the user smell, taste and chemesthetic sensations typical of tobacco or mint/menthol



Option 4 is the one Health Canada is recommending.

STEP 1: A couple of MUSTS

EMAIL: hc.pregs.sc@canada.ca

SUBJECT: Submission - Order Amending
Schedules 2 and 3 to the Tobacco and Vaping
Products Act (Flavours) Canada Gazette Part I,
Vol. 155, No. 25 on June 19th, 2021

Your submission must be in a PDF or Word doc
format.

Submitted by: (your full name here)
To: Manager, Vaping Products Regulations
Division
Tobacco Products Regulatory Office
Tobacco Control Directorate
CSCB, Health Canada
0301A-150 Tunney's Pasture Driveway
Ottawa, ON K1A 0K9
Email: hc.pregs.sc@canada.ca

STEP 2: INTRODUCTION

To whom it may concern,

Please find below my submission in response to Order Amending schedule 2 and 3 to the Tobacco and Vaping Products Act (Flavours) as published in Canada Gazette Part I, Vol. 155, No. 25 on June 19th, 2021.

IMPORTANT: It is very important to stipulate which of the four options put forward by Health Canada is the one which you support.

For instance, if you support maintaining the status quo on the matter of flavours in vaping products, then you should include language to that effect in your introduction. An example of this would be **“My submission is in support of Option 1: Baseline scenario (no further restriction on flavoured vaping products).”**

STEP 2: INTRODUCTION (cont'd)

Who are you? Start with giving your name, age, and location.

Are you / Were you a smoker? When did you start smoking? How many years did you smoke? How much did you smoke? What were the impacts of smoking to your health / wellbeing / quality of life?

For non-smokers / non-vapers who support tobacco harm reduction, describe the impacts of tobacco use among friends and family. Highlight facts such as smoking being the number one cause of preventable death in Canada, or that smoking kills 1 out of every 2 smokers.

STEP 3: PAST QUIT ATTEMPTS

Prior to vaping, have you ever tried to quit smoking? How many attempts? What methods did you use (patch, gum, champix or other prescribed medication, behavioural support, cold turkey, etc.)? Were these attempts difficult? Did they succeed?

For non-smokers / non-vapers who support tobacco harm reduction, describe those attempts among the smokers in your life.

STEP 4: QUITTING WITH VAPING

How did vaping compare to other quit methods? Have you significantly reduced the number of cigarettes smoked? Have you completely quit smoking? If so, how long have you been smoke-free? What are the impacts of vaping to your health / wellbeing / quality of life?

For non-smokers / non-vapers who support tobacco harm reduction, describe your loved ones' experience with significantly reducing or quitting smoking with vaping.

STEP 5: FLAVOURS

What category of flavour(s) do you vape (fruit, dessert, flavoured tobacco, plain tobacco, plain mint/menthol, flavourless)? How important are non-tobacco flavours to you? What impact would a ban of all flavours except for tobacco and mint/menthol have on your health / wellbeing / quality of life? Is there a risk of increased smoking / a complete return to cigarettes? Why?

For non-smokers / non-vapers who support tobacco harm reduction, describe the impact a ban on all flavours but tobacco and mint/menthol would have on your loved ones successfully making the switch to vaping or remaining smoke-free.

STEP 6: CONCLUSION

What do you hope will be the outcome of the consultation process? What are your demands? Be clear and concise.

You can re-state which of the four options you support in your conclusion.

Close with a polite salutation (Regards, Respectfully, Salutations, etc.)

If you opt to cite any studies or statistics in your submission, remember to add those at the end of your document.

FINAL NOTES

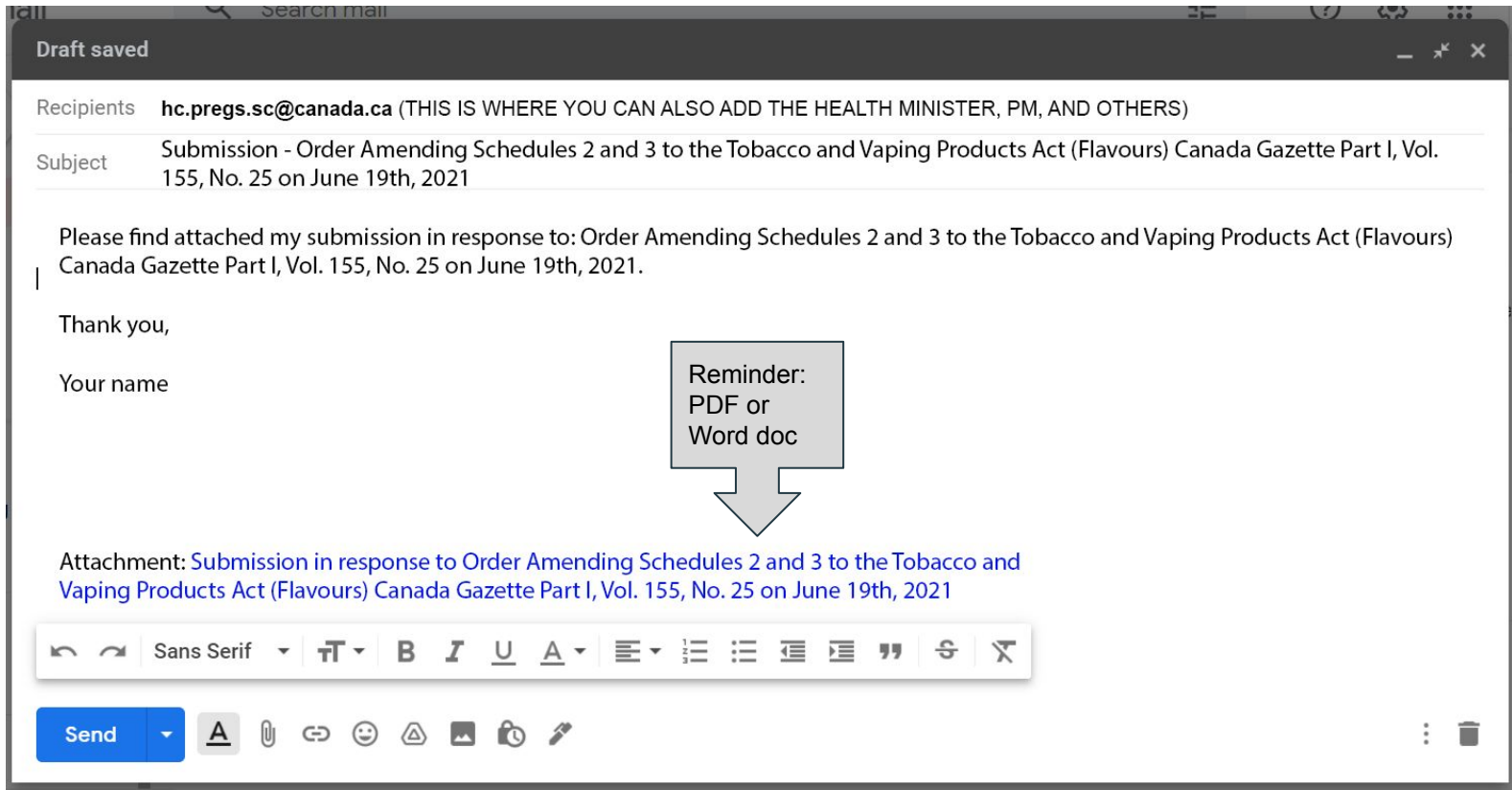
“Conflicts of interest”

Health Canada stipulates that "Any perceived or actual conflicts of interest with the tobacco industry must be declared when providing input to this consultation," and that "Members of the vaping and/or pharmaceutical industry, an affiliated organization or an individual acting on their behalf are asked to clearly indicate this in their submission."

CC'ing others

You can CC and/or BCC a number of people to add more pressure on lawmakers. Consider CC'ing federal Health Minister Patty Hajdu, Prime Minister Justin Trudeau, the leaders of the other federal parties, and your own federal MP (<https://www.ourcommons.ca/members/en>). Also consider BCC'ing vaping advocacy groups such as Rights4Vapers (info@rights4vapers.com) or the CDVQ (info@droitsdesvapeurs.ca).

**DEADLINE FOR
SUBMISSIONS:
SEPTEMBER 2nd**



(DATE)

Submitted by: **(your full name here)**

To: Manager, Vaping Products Regulations Division
Tobacco Products Regulatory Office
Tobacco Control Directorate
CSCB, Health Canada
0301A-150 Tunney's Pasture Driveway
Ottawa, ON K1A 0K9
Email: hc.pregs.sc@canada.ca

Subject: Submission in response to Order Amending Schedules 2 and 3 to the Tobacco and Vaping Products Act (Flavours) Canada Gazette Part I, Vol. 155, No. 25 on June 19th, 2021

To whom it may concern,

Please find below my submission in response to Order Amending schedule 2 and 3 to the Tobacco and Vaping Products Act (Flavours) as published in Canada Gazette Part I, Vol. 155, No. 25 on June 19th, 2021. My submission is in support of Option 1: Baseline scenario (no further restriction on flavoured vaping products).

INTRODUCTION

PAST QUIT ATTEMPTS

QUITTING WITH VAPING

FLAVOURS

CONCLUSION

Regards,

Your name

Your address



Thank you so much for your time.
LET'S FIGHT TO WIN!