

February 28, 2017

**Two days of discussion regarding the future of tobacco control in Canada is too short to address tobacco control measures in detail. Any discussion of detailed measures will distract from discussion of the fundamental elements that need to be part of the next strategy.** At the same time, preventing youth uptake, protecting non-smokers and helping smokers quit are long-standing goals that have been included in every federal strategy since the 1970s and continue to benefit from near-unanimous support.

**We therefore recommend that Forum participants direct discussions towards the following essential elements of tobacco control** that we have identified as being critical to achieving substantial reductions in tobacco use and related health harms:

**1. A whole-of-government approach**

Only some of the measures in a comprehensive tobacco control strategy are under the direct authority of Health Canada. For this reason it is critical that a *federal* tobacco control strategy include a whole-of-government approach, where the relevant policies of other federal ministries, including Finance, Public Safety, Agriculture, Global Affairs, Indigenous and Northern Affairs, Industry, etc., are aligned with Health Canada's tobacco control objectives.

**2. Accountability for targets**

In past decades, the government of Canada has set a series of goals for tobacco use and has usually failed to reach them, in part because there have been no consequences applied to industry or government for failure to reach these goals. The consultation paper sets a target of less than 5% tobacco use by 2035. Reaching this bold target will require that both the industry and the government are held accountable. One possible means of ensuring government accountability is an annual progress report to Parliament to be reviewed by a Parliamentary committee. Another is to have short-term binding benchmarks placed within the span of the next strategy.

**3. Effective controls on the tobacco industry**

The next strategy must acknowledge the fundamental role of the tobacco industry as the continuing vector of tobacco-related disease and achieve substantial progress in transforming how the industry operates in Canada. In addition, the industry should be made to pay for government tobacco control efforts, as France and the US have done. And the government needs to implement the full range of measures to prevent industry interference in policy-making, as required under Article 5.3 of the global tobacco control treaty, the Framework Convention on Tobacco Control (FCTC).

**4. An urgency to implementing other legislative measures**

The federal *Tobacco Act* is the centrepiece of federal tobacco control policy. Although Bill S-5 represents the first major amending of the *Tobacco Act* in 20 years, the Bill as introduced does little to address the many weaknesses in the *Act* identified by health groups more than 10 years ago or to provide an adequate response to recent industry innovations. It is vital that the *Tobacco Act* be amended as soon as possible to include a much broader scope of reforms.

**5. A harm reduction framework**

Bill S-5 introduces one specific harm reduction measure (legalizing and controlling vaping products) without any reference to the larger framework in which vaping should be situated. Allowing any new/less harmful product on the market should be part of a broader harm reduction strategy that directs consumers away from the most harmful products—combustible cigarettes—for example, by including their mandatory withdrawal from the market (gradual or otherwise).

**6. Effective tax/pricing policies for tobacco**

Tobacco taxation is at its core a highly effective public health measure, not just a source of government revenue. It is vital that the next strategy include a federal tobacco taxation strategy that prioritizes public health objectives and ensures policy coherence on this issue between Health Canada and Finance Canada, while at the same time discrediting the tobacco industry's disinformation campaign regarding taxation and its impact the contraband market. Another vital consideration is the fact that the industry manipulates prices, for example through price segmentation and retailer incentive programs, in order to undermine the impact of tobacco taxes. The next federal strategy must include a comprehensive pricing policy to counter such tactics.

**7. An approach to the introduction of new tobacco products**

In the past month, Philip Morris demonstrated that it can introduce a new product (iQOS) and a new route to market (web-based sales) without having to even notify Health Canada. This contrasts with other jurisdictions such as the US, where the government received scientific and market information on the product and its likely population health impact, and Australia and New Zealand, where the industry has no automatic entitlement to market new products. A new strategy should allow Health Canada to anticipate potential problems with new products and deal with them in a timely manner (instead of 5 or 10 years later, as with flavoured cigarillos and e-cigarettes). Requiring pre-approval of any new product containing tobacco is one possible mechanism to achieve this goal.

**8. Sustained, effective and well-funded mass media campaigns**

Beginning in 2001, Health Canada was authorized to spend up to \$50 million a year on mass media in support of tobacco control, not only to educate Canadians about the dangers of tobacco, but also to support tobacco control initiatives and policy development. However, very little was subsequently spent on mass media campaigns, and the funding completely disappeared as of 2007-08. A long-term, sustained and intensive mass media campaign needs to be reinstated, and it needs to focus primarily on changing social norms, including through industry denormalization.