

Madam Chair, members of the committee:

My name is Eva Campbell and I am co-owner of the End Vapor Shop in New Glasgow and Truro. I thank you for allowing me to speak today.

We ask that electronic cigarettes NOT be associated with traditional tobacco cigarettes simply because the product contains no tobacco and is in fact in direct competition with tobacco. I submit to you a sampling of test results that indicates that the eliquid we and other vendors sell has no tobacco content. As the bill is presently worded, it is clear that the honorable minister of health is not aware of the distinction between tobacco flavors and flavored tobacco.

As vendors and a consumers, we welcome sensible regulation of the electronic cigarette industry separate from tobacco. In fact, we already self regulate, in that we refuse to sell to minors. We require proper labeling of the ejuice, child proof bottles, proper safety certifications on all our hardware and independent lab testing of the liquid by a Health Canada accredited testing facility. I submit also our suggestions on regulating electronic cigarettes as a separate entity from tobacco.

What I and others object to is electronic cigarettes being labeled as a tobacco product. I personally object to the Honorable minister of health's attempt to redefine tobacco to include something that is absolutely not a tobacco product.

I am perplexed as to why the Honorable Minister of Health thinks we need anything else besides age restrictions for entry to vape shops. That alone would obviously negate the concern that we would be marketing to children. Perhaps time would be better served extending that requirement to the NSLC stores, which openly display bubblegum flavored vodka and Caramilk cream liquor.

Flavored ejuice is just that...flavored. It consists of propylene glycol (flavorless), vegetable glycerine (flavorless), may or may not contain nicotine (also flavorless) and food grade flavoring. Even tobacco flavored ejuice is just that....tobacco flavored, not flavored tobacco. The distinction must be made and I think this is where the Honorable minister of health is confused. Take away the flavoring and we are left with flavorless vapor. People don't even drink flavorless water anymore.

The majority of our customers are over 40 and enjoy having a variety of flavors available to them. I enjoy vaping fruit and candy flavors. Tobacco 'flavors' (not to be confused with tobacco that is flavored) in no way appeals to me. Saying that flavors only appeal to children is ludicrous, unless you contend that all Canadians upon reaching the age of 19 exist on cream of wheat and water? I did not think so.

Removing the flavorings from ejuice will effectively shut down the legitimate industry and send those consumers into either the black market or worse, back to smoking traditional tobacco. Today I can tell you I will never smoke another tobacco cigarette, as long as this is an available alternative.

Not letting the public see their choices in delivery systems (which incidentally look nothing like

cigarettes) and prohibiting point of sale marketing would be crippling to our business. Again, this is not a cigarette where all you have to do is light the right end and go. People benefit from hands on demonstration of the product and instruction on care, use, proper handling of the device.

It is distressing to me that our honorable minister of health has brought forth this bill without the slightest understanding as to what this product is or how it works.

Please consider what this will do, not only to the dozen or so strictly vaping businesses in Nova Scotia that will inevitably be shut down, but also how this will affect the thousands of Nova Scotian tax payers that will lose this ability to continue on with this safer alternative to traditional tobacco.

This bill is old fashioned slight of hand designed to make it impossible for any MLA in the house (regardless of their affiliation) to vote against it. It's battle cry? THINK OF THE CHILDREN AND GET RID OF FLAVORED TOBACCO ONCE AND FOR ALL. Then in the fine print it exempt the only flavored tobacco that anyone is even aware of. In reality it is a direct shot across the bow of anyone who tries to compete with big tobacco.

I am NOT a smoker, this is NOT tobacco and must not be lumped into the same category. We suggest that you remove mention of electronic cigarettes from this bill. If the Honorable minister of Health would like to propose sensible regulation on electronic cigarettes as its own consumer product, I am sure we would all be open to that.

The only thing this bill, as presently worded, will accomplish is the destruction of the most effective form of tobacco harm reduction to date and serves only to protect traditional tobacco from its only real competition.

Thank you for your time.

Madam Chair, members of the committee:

My name is Eva Campbell and I am co-owner of the End Vapor Shop in New Glasgow and Truro.

I thank you for allowing me to speak today on the matter of amendments proposed to the smoke free places act. Bill #60

Electronic cigarettes must not be defined as a tobacco product because it, quite simply, is NOT a tobacco product and in fact is in direct competition with tobacco. That being said, I submit test results that indicates that the eliquid we and other vendors sell has no tobacco content. As the bill is presently worded, it is clear that the honorable minister of health is not aware of the obvious distinction between tobacco flavors and flavored tobacco.

Looking at the list of 4000+ chemicals and known carcinogens in traditional tobacco cigarettes and comparing them with the 4 ingredients in the eliquid (none of which are tobacco by the way) I personally concluded (albeit, not scientifically) that you really don't have to be a rocket scientist to figure out that this is safer alternative. But you don't have to take my word for that, in recent years, there have been an overabundance of scientific research that proves just that. And my business partner will supply you with that information.

As vendors and a consumers, we welcome sensible regulation of the electronic cigarette industry separate from tobacco. In fact, we already self regulate, in that we refuse to sell to minors. We require proper labeling of the ejuice, child proof bottles, proper safety certifications on all our hardware and independent lab testing of the liquid by a Health Canada accredited testing facility. I submit also our suggestions on regulating electronic cigarettes as a separate entity from tobacco.

What I and others object to is electronic cigarettes being labeled as a tobacco product. Aside from the fact there is no tobacco present in the liquid, we view traditional tobacco as a direct competitor to our industry. I personally object to the Honorable minister of health's attempt to redefine tobacco to include something that is absolutely not a tobacco product.

This is like saying, we will be banning apples and by the way the definition of apples will now be extended to include... staplers. I am thinking Webster's may take issue with that.

I am perplexed as to why the Honorable Minister of Health thinks we need anything else besides age restrictions for entry to vape shops. That alone would obviously negate the concern that we would be marketing to children. Now, I am not a drinker so I was aghast to learn that this was not a requirement for the NSLC stores, which openly displays bubblegum flavored vodka and Caramilk cream liquor. (what's more kid friendly than a chocolate bar?)

Flavored ejuice is just that...flavored. It consists of propylene glycol (flavorless), vegetable glycerine (flavorless), may or may not contain nicotine (also flavorless) and food grade flavoring. Even tobacco flavored ejuice is just that...tobacco flavored, not flavored tobacco. The distinction must be made and I think this is where the Honorable minister of health is confused. Take away the flavoring and we are left with flavorless vapor. People don't even drink flavorless water anymore.

Vapers may start off with a tobacco flavoring, but most quickly find the flavor of tobacco objectionable. After all it was never the taste of a cigarette that got us hooked. The majority of our customers are over 40 and enjoy having a variety of flavors available to them.

Clearly I am not a child. However, I enjoy vaping fruit and candy flavors. Tobacco 'flavors' (not to be confused with tobacco that is flavored) in no way appeals to me. Saying that flavors only appeal to children is ludicrous, unless you contend that all Canadians upon reaching the age of 19 exist on cream of wheat and water? I did not think so.

Removing the flavorings from ejuice will effectively shut down the legitimate industry and send those consumers into either the black market or worse, back to smoking traditional tobacco. Today I can tell you I will never smoke another tobacco cigarette, as long as this is an available alternative.

Not letting the public see their choices in delivery systems (which incidentally look nothing like cigarettes) and prohibiting point of sale marketing would be crippling to our business. Again, this is not a cigarette where all you have to do is light the right end and go. People benefit from hands on demonstration of the product and instruction on care, use, proper handling of the device.

It is distressing to me that our honorable minister of health has brought forth this bill without the slightest understanding as to what this product is or how it works. Please, stop calling it tobacco. There is no more tobacco in this than there is in the coffee you drank this morning.

All I am asking is that before you jump on to this particular band wagon, you avail yourselves of the research that is available and make an informed decision about the inclusion of electronic cigarettes in Bill No. 60 and the proposed changes to the amendment. Please consider what this will do, not only to the dozen or so strictly vaping businesses in Nova Scotia that will inevitably be shut down, but also how this will affect the thousands of Nova Scotian tax payers that will lose this ability to continue on with this safer alternative to traditional tobacco.

This bill is old fashioned slight of hand designed to make it impossible for any MLA in the house (regardless of their affiliation) to vote against it. It's battle cry? **THINK OF THE CHILDREN AND GET RID OF FLAVORED TOBACCO ONCE AND FOR ALL.** Then in the fine print it exempt the only flavored tobacco that anyone is even aware of. In reality it is a direct shot across the bow of anyone who tries to compete with big tobacco.

I am NOT a smoker, this is NOT tobacco and must not be lumped into the same category. I suggest that you remove mention of electronic cigarettes from this bill. If the Honorable minister of Health would like to propose sensible regulation on electronic cigarettes as its own consumer product separate from tobacco, I am sure we would all be open to that.

The only thing this bill, as presently worded, will accomplish is the destruction of the most effective form of tobacco harm reduction to date and serves only to protect traditional tobacco from its only real competition.

Thank you for your time.





**West Yorkshire  
Analytical Services**

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Dr. Duncan Campbell B.Sc., D. Phil., M.Chem.A., C.Chem.,  
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Public Analyst and Agricultural Analyst

Report No: BC13339.DOC cmh

12 November 2013

Rainbow Vapor  
PO Box 3007  
Elmvale  
Ontario  
Canada  
L0L 1P0

**Sample Description:** Nicotine solution  
**Sample Identifier:** Dragon fruit 24mg  
**Laboratory Reference:** BC13339  
**Submitted by:** C Lanning  
**Date Received:** 24 October 2013  
**Date analysis completed:** 12 November 2013

**TEST REPORT**

The above sample has been analysed for nicotine by isotope-dilution gas chromatography-mass spectrometry and for other compounds and contaminants by gas chromatography-mass spectrometry with results as under.

Sample description	Parameter	Result
Clear pale yellow liquid	Nicotine	2.4 g/100g (24 mg/g)
		2.8 g/100ml (28 mg/ml)

Detection limit for nicotine is 0.01 g/100ml, 0.01 g/100g, 0.1 mg/ml

**Other compounds detected**

Propylene glycol  
Ethanol

Note – The compounds listed above under "other compounds" have been tentatively identified from their mass spectra and have not been confirmed by comparison with standard materials.

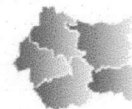
Ethylene glycol (CAS No 107-21-1), diethylene glycol (Digol, CAS No 111-46-6) and diacetyl (CAS No 431-03-8) were not detected in the sample (detection limit 0.1% approximately)

If I can be of any further assistance regarding these results, please do not hesitate to contact me.

C M Hunt B.Sc., M.Chem.A., C.Chem., F.R.S.C.,  
Registered Analytical Chemist  
Senior Principal Analyst

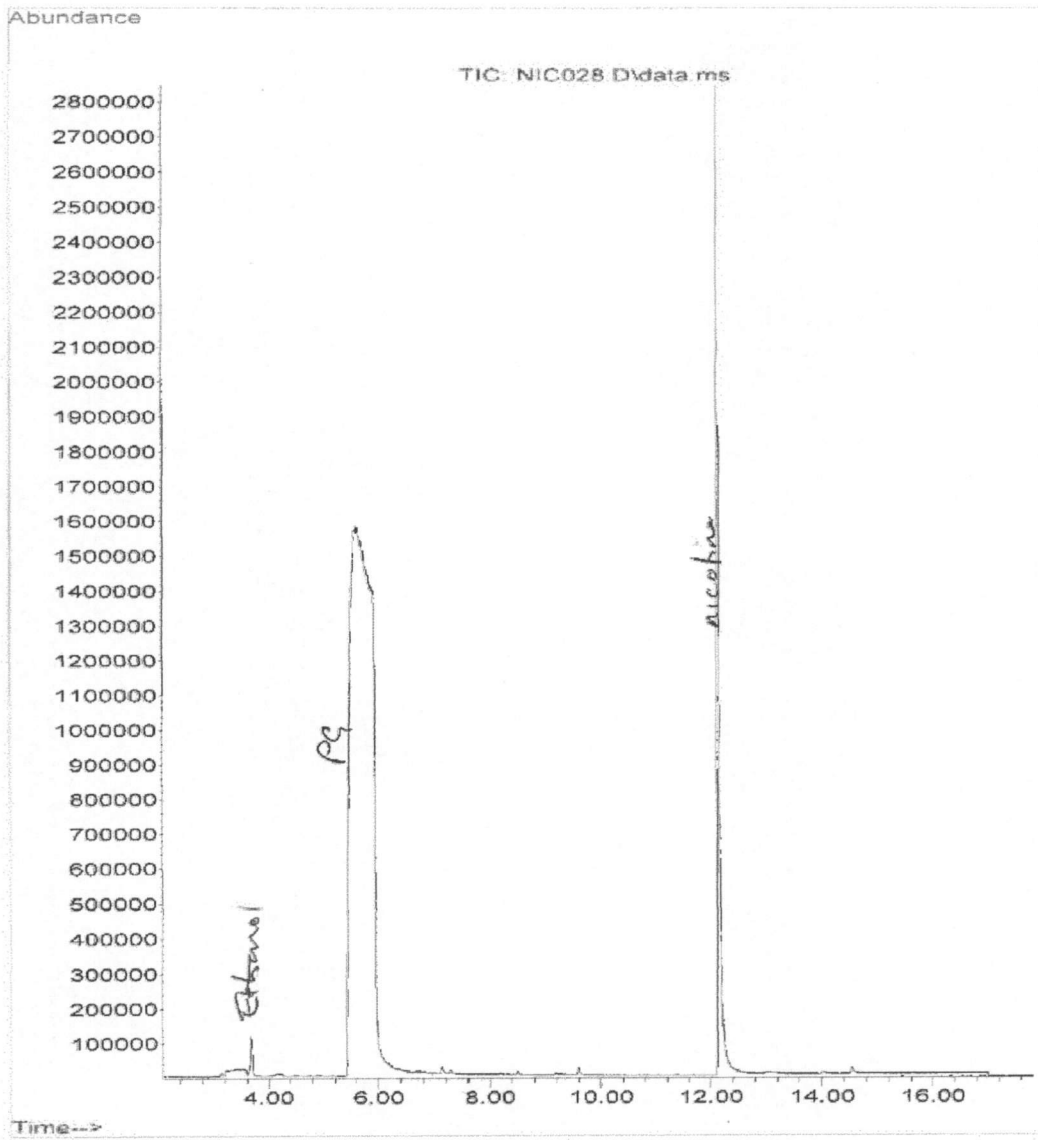
Direct line 0113 3837 555

Email [chunt@wyjs.org.uk](mailto:chunt@wyjs.org.uk)



D:\GCMS data 160309\1\DATA\FoodBC\Nicotine\bc13339\NIC028.D

Sample Name BC13339





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Dr. Duncan Campbell B.Sc., D. Phil., M.Chem A., C.Chem.,  
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Public Analyst and Agricultural Analyst

Report No: BC13340.DOC cmh

12 November 2013

Rainbow Vapor  
PO Box 3007  
Elmvale  
Ontario  
Canada  
L0L 1P0

**Sample Description:** Nicotine solution  
**Sample Identifier:** Johnny be good PG 26mg  
**Laboratory Reference:** BC13340  
**Submitted by:** C Lanning  
**Date Received:** 24 October 2013  
**Date analysis completed:** 12 November 2013

### TEST REPORT

The above sample has been analysed for nicotine by isotope-dilution gas chromatography-mass spectrometry and for other compounds and contaminants by gas chromatography-mass spectrometry with results as under.

Sample description	Parameter	Result
Clear pale brown liquid	Nicotine	2.5 g/100g (25 mg/g) 2.9 g/100ml (29 mg/ml)

Detection limit for nicotine is 0.01 g/100ml, 0.01 g/100g, 0.1 mg/ml

#### Other compounds detected

Propylene glycol	Corylone
Glycerol	Tetramethyl pyrazine
Ethanol	
Trimethyl pyrazine	

Note - The compounds listed above under "other compounds" have been tentatively identified from their mass spectra and have not been confirmed by comparison with standard materials.

Ethylene glycol (CAS No 107-21-1), diethylene glycol (Digol, CAS No 111-46-6) and diacetyl (CAS No 431-03-8) were not detected in the sample (detection limit 0.1% approximately)

If I can be of any further assistance regarding these results, please do not hesitate to contact me.

C M Hunt B.Sc., M.Chem.A., C.Chem., F.R.S.C.,  
Registered Analytical Chemist  
Senior Principal Analyst

Direct line 0113 3837 555

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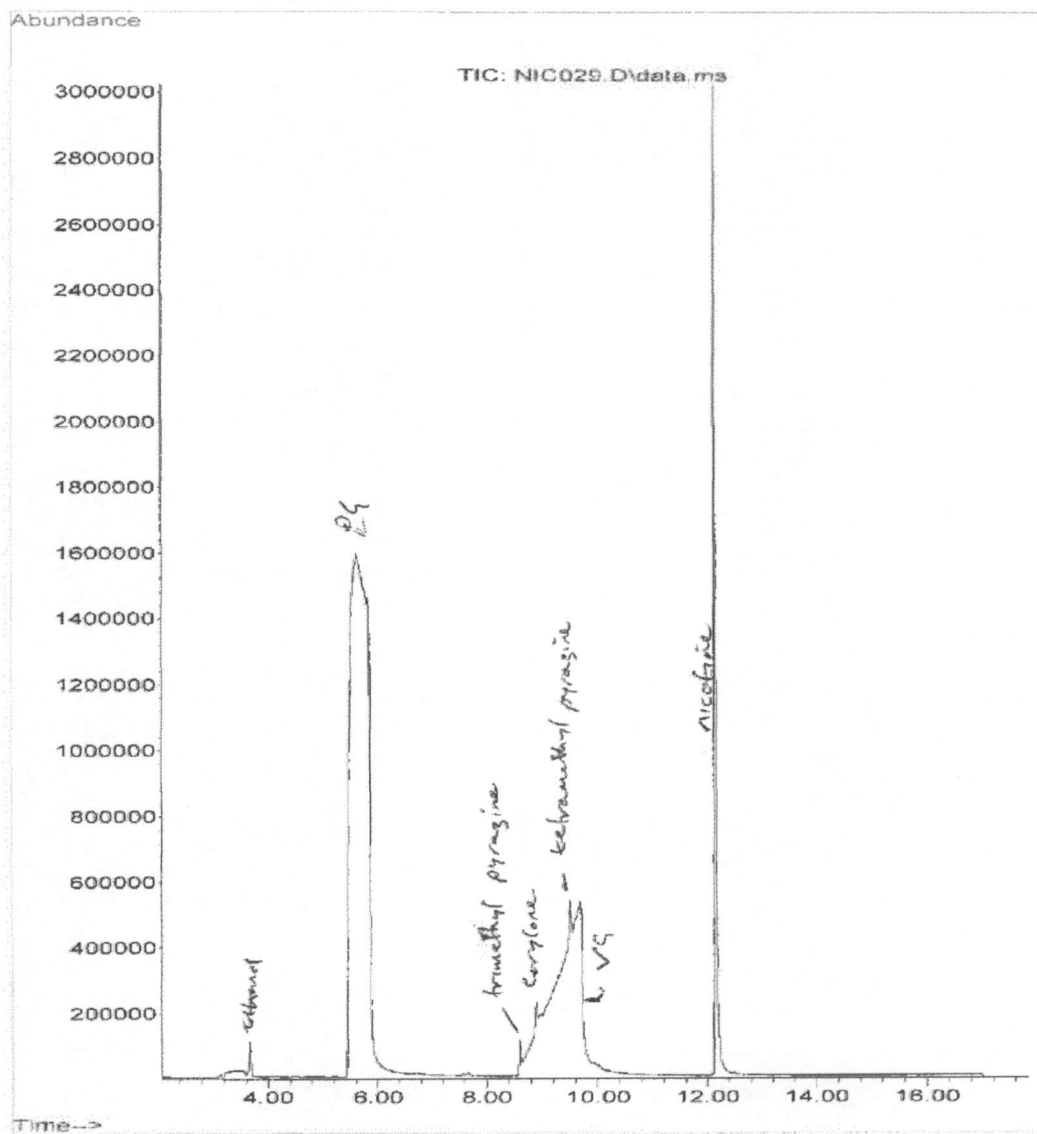
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West Yorkshire Joint Services are provided by a Joint Committee of the Metropolitan Districts of  
Bradford, Calderdale, Kirkstall, Leeds and Wakefield.



Sample Name BC13340.1





*Duncan Campbell*



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*Dr. Duncan Campbell B.Sc., D. Phil., M.Chem A., C.Chem.,  
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Public Analyst and Agricultural Analyst*

Report No: BC00264.DOC cmh

09 April 2013

Rainbow Vapor  
PO Box 3007  
Elmvale  
Ontario  
Canada  
L0L 1P0

**Sample Description:** Nicotine solution  
**Sample Identifier:** Unflavoured base 36mg  
**Laboratory Reference:** BC00264  
**Submitted by:** C Lanning  
**Date Received:** 04 April 2013  
**Date analysis completed:** 09 April 2013

### TEST REPORT

The above sample has been analysed for nicotine by isotope-dilution gas chromatography-mass spectrometry and for other compounds and contaminants by gas chromatography-mass spectrometry with results as under.

Sample description	Parameter	Result
Clear pale yellow liquid	Nicotine	3.6 g/100g 37 mg/ml (assuming density of 1.04 g/ml)

#### Other compounds detected

Propylene glycol

Note – other compounds have been tentatively identified from their mass spectra and have not been confirmed by comparison with standard materials.

Ethylene glycol (CAS No 107-21-1), diethylene glycol (Digol, CAS No 111-46-6) and diacetyl (CAS No 431-03-8) were not detected in the sample (detection limit 0.1% approximately)

If I can be of any further assistance regarding these results, please do not hesitate to contact me.

C M Hunt B.Sc., M.Chem.A., C.Chem., F.R.S.C.,  
Registered Analytical Chemist  
Senior Principal Analyst

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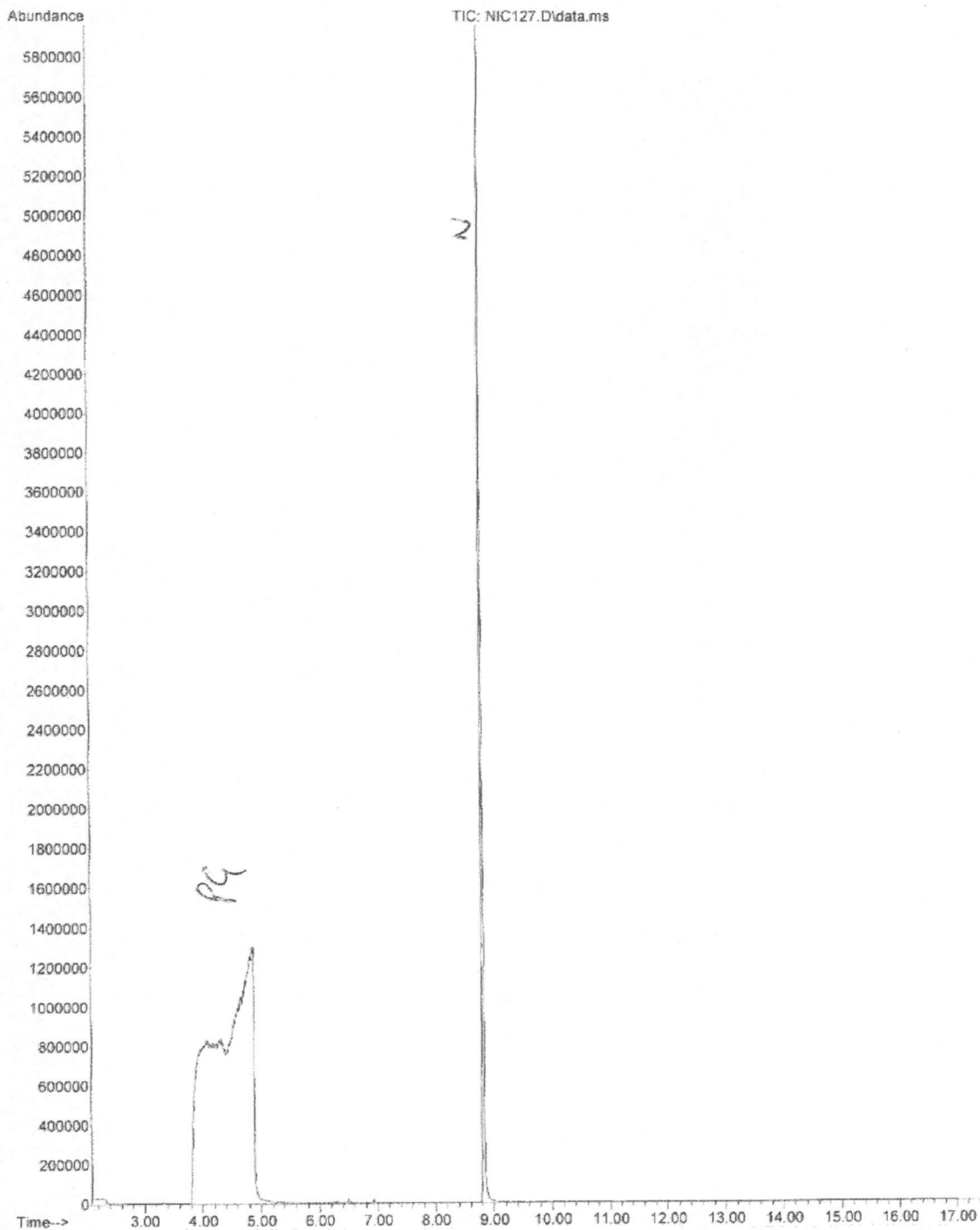
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Page 1 of 1

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Bradford, Calderdale, Kirkstall, Leeds and Wakefield.



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Operator : lb  
Acquired : 8 Apr 2013 4:18 using AcqMethod NICOSIMSCAN.M  
Instrument : Instrument #1  
Sample Name: BC00264  
Misc Info : BC00264  
Vial Number: 41





## West Yorkshire Analytical Services

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Dr. Duncan Campbell B.Sc., D. Phil., M.Chem A., C.Chem.,  
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Public Analyst and Agricultural Analyst

Report No: BC00265.DOC cmh

09 April 2013

Rainbow Vapor  
PO Box 3007  
Elmvale  
Ontario  
Canada  
L0L 1P0

**Sample Description:** Nicotine solution  
**Sample Identifier:** French vanilla 18mg  
**Laboratory Reference:** BC00265  
**Submitted by:** C Lanning  
**Date Received:** 04 April 2013  
**Date analysis completed:** 09 April 2013

### TEST REPORT

The above sample has been analysed for nicotine by isotope-dilution gas chromatography-mass spectrometry and for other compounds and contaminants by gas chromatography-mass spectrometry with results as under.

Sample description	Parameter	Result
Clear pink liquid	Nicotine	1.75 g/100g 18 mg/ml (assuming density of 1.04 g/ml)

#### Other compounds detected

Propylene glycol	Caprolactone (CAS 695-06-7)	Anisaldehyde propylene glycol acetal
Hydroxybutanone	Isopentylisovalerate (659-70-1)	Unidentified peaks at 10.8 min
Trimethyl dioxolane	Ethyl maltol	Unidentified peaks at 11.1 min
Benzyl alcohol	Vanillin	

Note – other compounds have been tentatively identified from their mass spectra and have not been confirmed by comparison with standard materials.

Ethylene glycol (CAS No 107-21-1), diethylene glycol (Digol, CAS No 111-46-6) and diacetyl (CAS No 431-03-8) were not detected in the sample (detection limit 0.1% approximately)

If I can be of any further assistance regarding these results, please do not hesitate to contact me.

C M Hunt B.Sc., M.Chem.A., C.Chem., F.R.S.C.,  
Registered Analytical Chemist  
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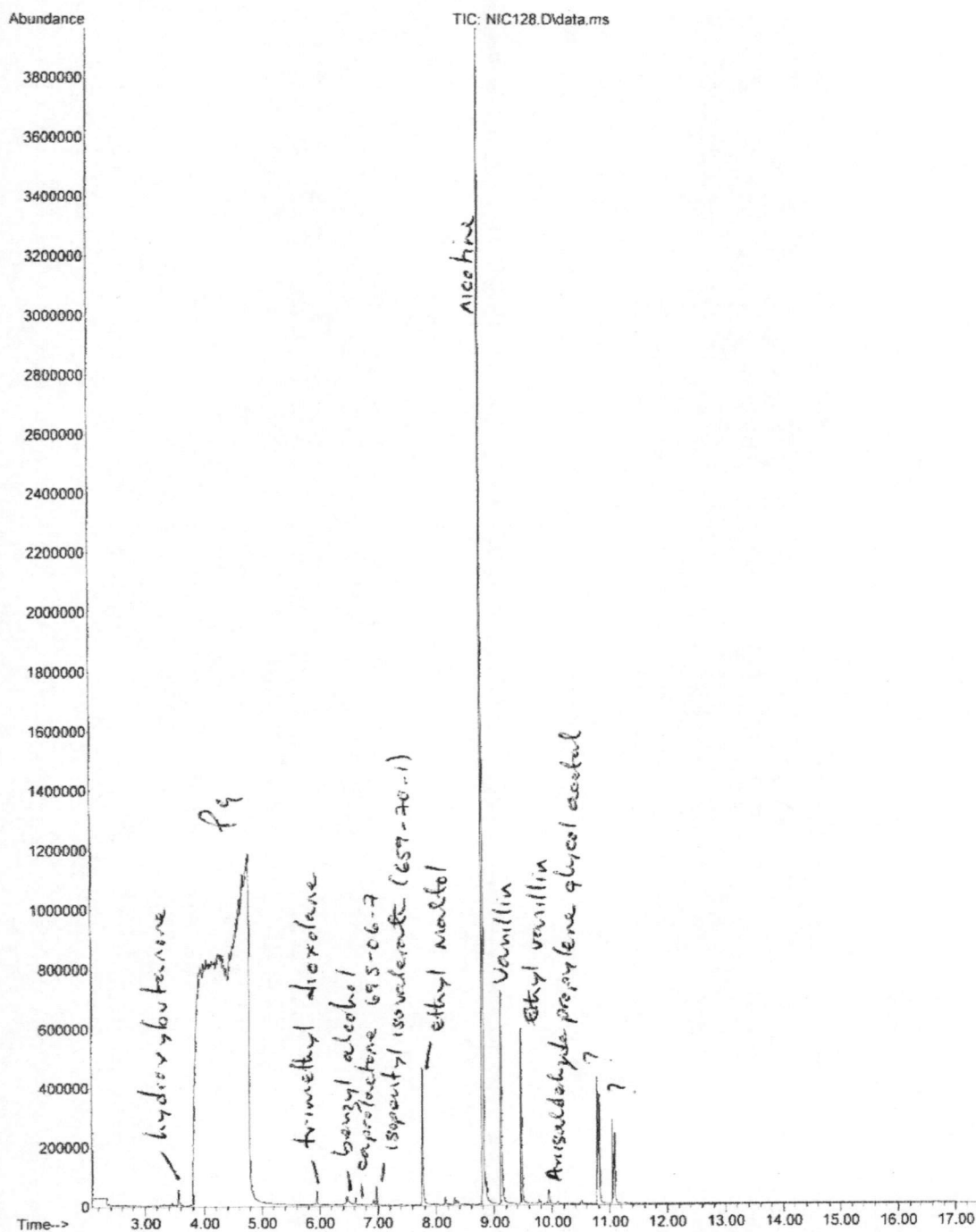
Direct line 0113 3837 555

Email [chunt@wyjs.org.uk](mailto:chunt@wyjs.org.uk)

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Page 1 of 1

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Operator : lb  
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Instrument : Instrument #1  
Sample Name: BC00265  
Misc Info : BC00265  
Vial Number: 42



## **An Act To Regulate The Sale And Usage of Vapor Products (Electronic Cigarettes)**

### **Be it enacted by the Governor and Assembly as follows:**

- 1 The sale of electronic cigarettes and e-liquid (also known as e-juice) which contain nicotine must not be sold to any person under the age of majority. Government issued identification must be requested and inspected by the seller before completing a transaction for purchase of said items to confirm that the age requirement has been met.
- 2 E-Liquid should be considered a consumer product and should be sold and labeled as such. E-liquid packaging and labels should be up to the standards set out and described by the Canadian Consumer Chemicals & Containers Act as per *SOR/2001-269*
- 3 A vapor product is distinguished from and is different from a tobacco product and does not create smoke, but a vapor. Vapor products are not tobacco products and do not fall under the scope of the Tobacco Act regulations.
- 4 Vapor products are not tobacco products and shall not be taxed as a tobacco product.
- 5 The use of electronic cigarettes should fall under the 'Smoke Free Places Act' and only be used in designated areas that cater specifically to electronic cigarettes.
- 6 E-liquid may have a wide array of flavoring from tobacco flavors, fruit, bakery, beverage, menthol and candy. As per conducted study the flavor variability with the electronic cigarettes plays a crucial role in the effectiveness and dedication to the product as taste buds develop and become more vivid.

### **Definitions**

**"Vapor Product"** – A vapor product, also known as an electronic cigarette, e-cig, personal vaporizer, is a non-combustible product that may or may not contain nicotine and employs a mechanical heating element, battery, or electronic circuit that can be used to heat liquid to create a vapor contained in a cartridge or wicking material. These products do not create smoke, but a vapor which looks like smoke but is very different from smoke as shown in countless peer reviewed research studies.

**"E-Liquid"** – Also known as "E-Juice" is a liquid solution made up of Propylene Glycol, Vegetable Glycerin, Food Grade Flavoring and may or may not contain nicotine for use in electronic cigarette or vapor products.



## CCCR Label & Packaging


E-Liquid should be considered a consumer product and should be sold and labeled as such. E-liquid packaging and labels must be up to the standards set out and described by the Canadian Consumer Chemicals & Containers Act. [1]

E-liquid container labels must meet a quality standard in which it is indelible, clear, legible, and measured properly per bottle per mL. All covers and/or caps should be childproof and/or contain vacuum sealed packaging.

Proper sizing for 30mL bottling system:

With or without nicotine: 30 mL Bottle of 1 7/16 × 4 in. or 3.65 × 10.16 cm [See Figure A]

[Figure A]

<p><b>CONTENTS HARMFUL</b> Do not swallow. Do not get in eyes or on skin or clothing. Keep out of reach of children and pets. <b>TO OPEN:</b> Push down, turn counterclockwise. <b>TO CLOSE:</b> Place cap over nozzle, turn clockwise.</p> <p><b>INGREDIENTS:</b> Propylene Glycol (&lt;70%), Glycerin (30%), Nicotine (1.2%), Food Grade Alcohol, Natural and Artificial Flavourings.</p> <p>BATCH: MFFN12483859 EXPIRES: JUNE 2016</p> <p>Produced by: JuiceDude, ON, Canada</p>	<p><b>YOUR LOGO HERE</b></p> <p><b>MY FAVOURITE FLAVOUR NAME</b></p> <p>Medium Strength: 12mg</p> <p>May contain traces of nuts</p> <p> DANGER</p>	<p><b>CONTENIR NOCIF</b> Ne pas avaler. Ne pas obtenir dans les yeux ou sur la peau ou les vêtements. Tenir hors de la portée de enfants et des animaux de compagnie. <b>POUR OUVRIR:</b> Enfoncez et tournez, sens anti-horaire. <b>POUR FERMER:</b> Placez le bouchon sur le bec et tournez, sens horaire.</p> <p><b>INGREDIENTS:</b> Propylène Glycol (&lt;70%), glycérine (30%), de la nicotine (1.2%), l'alcool de qualité alimentaire, arômes naturels et artificiels.</p> <p>Approx: 30 mL Produit par: JuiceDude, ON, Canada</p>
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Proper sizing for 10mL bottling system:

With or without nicotine: 10 mL Bottle of 1 × 2 1/8 in. or 2.54 × 6.65 cm

## Overview

Nicotine is not a carcinogen, it does not cause lung disease nor does it stiffen the arteries in the heart. Nicotine can not be classified as a medication. As per Dr. Konstantinos Farsalinos: *"Definition: nicotine is not a medication. Or, if it is a medication, you cannot discriminate and consider it a medication in some products only and not in others. Since tobacco cigarettes cannot be regulated as medications, all attempts to regulate e-cigarette liquid based on nicotine presence will fail."*

Renormalization by definition of the word cannot apply to electronic cigarettes in comparison to tobacco cigarettes. As per Webster's Dictionary; *Renormalization; a method used in quantum mechanics in which unwanted infinities are removed from the solutions of equations by redefining parameters such as the mass and charge of subatomic particles.* Unfortunately the Electronic Cigarette VS Tobacco Cigarette being in direct competition have no play within quantum theories therefore making the act of renormalization impossible for this argument.

By moral standards the electronic cigarette and it's E-juice should not be sold to those under the age of majority. In saying this we ask for regulation to be passed on this matter. No sales to those under the age of majority whether or not the E-juice or electronic cigarette contains nicotine.