

Sarah Blades – IWK Health Centre Mental Health & Addictions Program

My name is Sarah Blades and I am a Prevention and Health Promotion specialist with the Mental Health & Addictions Program at the IWK Health Centre in Halifax. The focus of the work I do is to address the social determinants of health that significantly influence mental health outcomes and substance use risk among Nova Scotian youth. This work includes influencing the policy environment in which Halifax's children and youth live, learn and play.

It is a pleasure and a privilege to appear today and speak in support of Bill 233 and the proposed legislative amendments to the Smoke-Free Places Act and the Tobacco Access Acts of Nova Scotia.

The proposed amendments will strengthen supportive smoke free environments, pave the way for provincial regulation over highly addictive nicotine concentration limits in vaping products, and will begin to match enforcement over electronic cigarettes with other types of tobacco.

Sarah Blades – IWK Health Centre Mental Health & Addictions Program

This government should be applauded for the comprehensive approach it is taking on regulation, thereby reducing the harms of nicotine addiction for youth especially with respect to increased taxation, removing retail access to flavoured vaping products, restricting nicotine concentration limits and improving smoke free environments. These important amendments will certainly contribute to healthier futures for our children and youth.

ENVIRONMENT

When legislation reduces the amount of smoking in public places, the behavior becomes denormalized. For this reason among others, it is important that the entirety of restaurants and patios remain smoke free places. The amendment in the Smoke Free Places Act clarifying the definition of a patio and closing related loopholes will sustain the protection for establishments as smoke free places not just for children and youth, but for everyone.

Sarah Blades – IWK Health Centre Mental Health & Addictions Program

Other environmental considerations include the social policy and marketing environments. In a recent study by Dr. David Hammond and colleagues, international comparisons of youth vaping behaviour between 2017 and 2018 show that while US and Canadian youth have increased regular vaping between the two time points, youth in England have not increased their vaping over time, and remain at lower rates than in the US and Canada. Data from 2019 soon to be released by Dr. Hammond and colleagues indicate that this effect continues to strengthen. In England, marketing is restricted and nicotine concentrations are capped much lower than what is permitted in North America. These findings reinforce the impact that strong regulatory environments can have in reducing the spread of a youth vaping epidemic.

Further success in reducing vaping harms can be achieved when we also consider the online environment. Increased marketing via promotion by influencers on social media platforms that youth

Sarah Blades – IWK Health Centre Mental Health & Addictions Program

frequently access is of concern. In late December 2019, Facebook and Instagram took a strong stance in banning influencers from advertising vape products on their platforms. The relatively unregulated online sale of vape products can be another access point for children and youth. It would be prudent for the province to consider the implementation of an online retail ban, to ensure vape products are only being purchased by people over the legal age limit.

EMERGING PRODUCTS

The proposed amendments additionally provide a solid base for our government to regulate emerging nicotine delivery products. This is essential as the tobacco industry will very likely evolve product development to respond to consumer preferences and changing regulatory landscapes across the globe. This amendment language enables the province to be nimble in responding to new nicotine delivery products that may be enticing to children and youth.

NICOTINE CONCENTRATION LIMITS

Medical experts concur that nicotine exposure has a severe negative impact on the developing brain. Early, regular exposure to nicotine predisposes youth for other addiction problems and concentration problems among other challenges in life.

Working in the area of the social determinants of health, we know that educational achievement correlates with higher socioeconomic status.

When a young person experiences challenges in school because of addiction, impaired concentration, and other barriers, they are disproportionately impacted by poorer or insecure work opportunities, insecure housing and poverty. In turn, disadvantages in these areas are correlated with poorer health overall. Nicotine addiction is not a habit, but a treatable illness. Regulatory structures like these additionally reduce the burden on our social and dependence treatment systems.

Sarah Blades – IWK Health Centre Mental Health & Addictions Program

Attractive candy and sweet flavours are a key factor in youth initiation of vaping. In addition, potent nicotine salt formulas of vaping liquid deliver a large amount of nicotine without the harshness of regular cigarettes, facilitating addiction to develop. The cost for 4 highly concentrated nicotine liquid pods is significantly less than what the equivalent in 4 packages of combustible cigarettes would cost, making them further attractive to youth. These products are readily available at gas stations, convenience stores and grocery store tobacconists. Based on the current state regulatory environment, it does not seem difficult to understand why so many Nova Scotian youth, their schools, and their caregivers are concerned about increasing vaping rates.

ENFORCEMENT

The amendments to the Tobacco Access Act empowering officers and inspectors to confiscate electronic cigarettes more accurately reflect the validity of the harms presented by these items.

We support the non-punitive approach of confiscation and not charging children and youth. It is also our position to increase enforcement activities in the direction of retailers and specialty vape shops, so that the burden is placed with adults who are responsible for the sale of products under the act rather than youth.

Finally, we also support strengthening the proposed amendments with the concurrent bills introducing higher taxation of vaping products and licensure for their retail sale, and the previously introduced vaping product flavour ban. According to recent local data, many youth who vape indicate that they would quit if flavoured vape products were no longer available. There is an international consensus that youth are

Sarah Blades – IWK Health Centre Mental Health & Addictions Program

very sensitive to the price of products. After implementation of increased cigarette taxation in Nova Scotia, rates of youth smoking plummeted. We look forward to similar success with the proposed amendments and the comprehensive approach tabled in the Legislature.

CLOSING

In summary, the IWK Mental Health & Addictions program supports the proposed amendments in Bill 233. In making these changes, Nova Scotia would join a long list of jurisdictions that are taking direct, impactful regulatory action to protect the health of youth. Just recently, PEI has implemented a restriction of the sale of tobacco products to people over age 21. The same has been applied within many of the United States. Strong legislative changes are being made on the West Coast of Canada in British Columbia including lower

Sarah Blades – IWK Health Centre Mental Health & Addictions Program

nicotine concentration limits and unique taxation structures. These are examples by which Nova Scotia, and the rest of the country, can be inspired to act.

It is incumbent upon the IWK to improve and protect conditions for our children and youth to thrive. One of the ways we can do this is by enabling Nova Scotia's youth to grow up free from the impacts of nicotine addiction and to live long and healthy lives.

Members of the Law Amendments Committee, thank you for your time and I am happy to address your questions.

Sarah Blades – IWK Health Centre Mental Health & Addictions Program

Q&A

Q1. Why would you restrict adults from access to ++ nicotine concentration liquid for titration/cessation?

- Restriction on nicotine content is important especially in pod/nicotine salt devices as they are most easily obtained by youth from corner stores and the peer to peer market.
- Devices that can modify nicotine content from vape liquid are readily available to adults in 19+ vape shops.
- Adults who smoke are unlikely to progress to cessation of nicotine addiction, when they switch to vape products, and only are switching the nicotine delivery system from commercial tobacco cigarettes to vaping devices.
- The small inconvenience of reduced access for adult smokers does not outweigh the obligation for our government to protect children and youth from these products.

Q2. Why would you restrict vaping on patios when the risk of second hand smoke is low?

- The move to close loopholes in the Smoke Free Places Act serves to protect the environment from any exposure to second hand smoke. When we restrict the places where smoking is permitted, we continue to build a supportive environment that does not normalize smoking.
- This is especially important when we consider the impact of environmental cues for people who are attempting cessation and for children & youth.

Q3. Vaping flavoured e-juice is the best way for me to quit smoking, why is it further restricted and making it harder for me to quit cigarettes?

- Vaping is not considered to be an evidence based quit method, and is not like regulated Nicotine Replacement Therapies regulated by Health Canada.
- The risk to youth of continuing to offer flavoured vape products for retail in Nova Scotia far outweighs the benefit of providing the product for a small portion of adult smokers who choose to vape over smoking cigarettes. The IWK supports a healthy future for women, children, youth and families – including an environment that reduces harms from nicotine addiction.
- Although flavoured vape juice is popular among adults who vape, it is one of the leading factors in a young persons introduction to vaping. OR>>> Most young people who vape have never smoked, and a common enticing factor is flavoured vapes.
- <https://truthinitiative.org/research-resources/emerging-tobacco-products/few-adults-start-using-juul-quit-smoking-new-study> Vaping does not usually turn into quitting for adult smokers.
- Smokers' support for tobacco endgame measures in Canada: findings from the 2016 International Tobacco Control Smoking and Vaping Survey
<http://cmajopen.ca/content/6/3/E412.full>

Sarah Blades – IWK Health Centre Mental Health & Addictions Program

Results: Among cigarette endgame policies, support was highest for reducing nicotine content (70.2%), raising the legal age for purchase (69.8%), increasing access to alternative nicotine products (65.8%) and banning marketing (58.5%). Among e-cigarette policies, there was majority support for restricting youth access (86.1%), restricting nicotine content (64.9%), prohibiting use in smoke-free places (63.4%) and banning marketing (54.8%).

Q4. There's a lot of talk about enforcement, what novel practices would be successful in reducing access and marketing?

- The IWK Health Centre advocates for a stronger retail structure for tobacco and vape products, in that raising the age to purchase to 21 would largely remove a peer to peer source for youth. International evidence agrees that raising the legal purchasing age of tobacco to 21 means that a 21 year old is much less likely to be in a peer group with 17 and 18 year olds, than a 19 year old. This removes the legal purchaser from a peer group and results in less access to tobacco or vape products for youth.
- We support the recent announcements in the provincial budget for 20/21 include measures to increase taxes on vaping products. We know from international evidence that youth are price sensitive when likelihood to purchase is concerned. Increasing the price of tobacco products has historically produced dramatic reductions in youth smoking rates in NS.
- We would also applaud a move to only allow advertising of vape products in specialty vape shops where only 19+ persons can enter. This further denormalizes the sale of vapes in corner stores and other locations.

Q5. There are a lot of unknowns about vaping, isn't it premature to restrict these items in such a harsh way?

- Vaping may be less harmful than smoking combustible tobacco, however it is not risk free.
- The more research evolves on vaping, the more we know about EVALI, vape smoke particulate contents and the impact on human health.
- The purview of public health approaches are to adopt measures according to the precautionary principle and until shown safe and effective, to restrict.
- These proposed amendments also mobilize the NS Government in reducing risks that may quickly arise from the ever changing landscape of nicotine delivery methods developed by the tobacco industry (hookah, snus, tobacco free chew, gels, etc). The industry will continually adapt to a regulatory framework and this frees NS to address concerns as they arise.
- NS is just one additional jurisdiction in a long list of jurisdiction that is seeking to highly regulate these products.
- As researcher Dr. David Hammond indicates, cigarettes have been commercially available in Canada for decades. Only recently have they been regulated, taxed and plain packaged to reflect the need to restrict access to these products.