



Consultation on the Legislative Review of the *Tobacco and Vaping Products Act*

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Introduction

The Canadian Centre on Substance Use and Addiction (CCSA) is grateful to provide feedback on Health Canada's Consultation on the Legislative Review of the Tobacco and Vaping Products Act. The consultation provides the opportunity to discuss the rise of vaping among young cannabis users and why it is important to maintain the existing list of prohibited ingredients and aromas in the act. CCSA supports maintaining an evidence-based public health approach to cannabis regulation. This includes continued oversight to protect young people from vaping products.

CCSA was created by an act of Parliament to provide national leadership to address substance use in Canada. As trusted counsel, we provide national guidance to decision makers by harnessing the power of research, curating knowledge and bringing together diverse perspectives.

Prohibited Ingredients and Aromas

An important avenue of protecting young persons is to prohibit the promotion of product flavourings. Vaping rates of different substances among youth and young adults are much higher than those 25 years and older (Chadi et al., 2021; Fataar & Hammond, 2019; Goodman, 2021). As a result, advertising and promotion of cannabis vaping products are more likely to target or influence young people. This is concerning when promotional representations create the impression that cannabis extract has a flavour that is appealing to youth, regardless of the nature of the flavouring agent used. Flavours can create a pleasant taste and smell, which can reinforce and encourage cannabis use (Werts et al, 2021).

The *Cannabis Regulations* of the *Cannabis Act* refers to the prohibited ingredients and flavours in schedules 2 and 3 of the *Tobacco and Vaping Products Act*. The retention of these lists is important in addressing the rise in vaping among younger people who use cannabis.

Youth, Cannabis and Vaping

Canadian youth consistently rank as the most prevalent and youngest consumers of cannabis in the world. Butler et al (2021) found that students who used cannabis, e-cigarettes and cigarettes were likely to continue their use of each substance at a two-year follow-up. Furthermore, those who reported using cannabis were more likely to report using cigarettes and e-cigarettes during follow-up surveys, and vice versa. This raises concern due to sustained and increased youth consumption patterns and the risk of negative health effects. Some concerns include the predisposition of youth to cannabis or nicotine addiction and harm in their brain development due to early exposure to



cannabis (Lisdahl et al, 2014). Also, vaping cannabis could expose youth to aerosols containing chemicals with known and unknown respiratory toxicity (Braymiller et al, 2020).

Conclusion

The *Tobacco and Vaping Product Act* must continue to support public health and safety in line with the intent of the Cannabis Regulations. This includes keeping measures to protect young persons from vaping products, such as schedules 2 and 3 of the *Tobacco and Vaping Products Act*.

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