

December 5, 2024

Minister of Mental Health and Addictions  
The Honourable Ya'ra Saks  
Minister of Health  
Mark Holland  
House of Commons  
Ottawa, ON  
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**RE: Health Canada's Order Amending Schedules 2 and 3 to the Tobacco and Vaping Products Act (Flavours) and Standards for Vaping Products' Sensory Attributes Regulation**

The Board of Health for Haliburton, Kawartha, Pine Ridge District Health Unit (HKPRDHU) is writing in support of Health Canada's Order Amending Schedules 2 and 3 to the Tobacco and Vaping Products Act to ban all e-cigarette flavours excluding mint, menthol and tobacco. The Board of Health also recommends strengthening Health Canada's amendment by including mint and menthol in the ban. This legislation is a necessary step in addressing the growing public health crisis of youth vaping in our communities.

Flavoured e-cigarettes are particularly popular among youth, contributing significantly to their decision to start vaping<sup>1</sup>. In 2024, 9 out of 10 middle to high school students reported using vape flavours, with fruit, candy and mint being the most popular<sup>1</sup>. The Canada Gazette reports 99% of e-cigarettes sold in Canada are flavoured<sup>2</sup>, which enhances their appeal while also concealing the harsh effects of nicotine<sup>3</sup>. Additionally, documents from the tobacco industry

<sup>1</sup> Centers for Disease Control and Prevention (CDC). "Why Youth Vape." [Why Youth Vape | Smoking and Tobacco Use | CDC](#)

<sup>2</sup> Canada Gazette. "Regulations Amending the Tobacco Products Regulations." 2021. [Canada Gazette, Part 1, Volume 155, Number 25: Order Amending Schedules 2 and 3 to the Tobacco and Vaping Products Act \(Flavours\)](#)




<sup>3</sup> A Review of the Use and Appeal of Flavored Electronic Cigarettes." PubMed Central (PMC). <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6709993>



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indicate that adolescents and young adults not only prefer flavoured tobacco products, but they are particularly susceptible to them<sup>3</sup>. Furthermore, the Canadian Lung Association highlights that mint and menthol are the second most desired flavours after candy and fruit<sup>4</sup>. They further emphasize that 70.3% of youth aged 15 to 19 prefer candy or fruity flavours, while 10.3% opt for mint or menthol<sup>4</sup>. Similarly, among those aged 20 to 24, 62.3% choose fruity or candy flavours, with 20.9% selecting mint or menthol<sup>4</sup>.

The 2023 Ontario Student Drug Use and Health Survey reports that among youth who identified vaping in the past year, 87% reported vaping nicotine<sup>5</sup>. The appeal of flavoured vaping liquid contributes to nicotine addiction, which adversely affects mental and physical health, exacerbating conditions such as anxiety, depression and stress<sup>6</sup>. Furthermore, research suggests that vaping can lead to smoking combustible cigarettes, despite it being advertised as a smoking cessation option<sup>7</sup>. In fact, some research shows that youth who vape are 3.6 times more likely to begin smoking tobacco later in life<sup>7</sup>. While it is important to have smoking cessation options available, it is crucial to disincentivize youth from being lured into vaping through appealing flavours and other deceptive tactics.

The widespread use of flavours and their impact on youth highlight the urgent need for regulatory action. In addition to banning the flavours, we also recommend banning mint and menthol as they are the second most desired flavour. This measure will address the primary factor driving youth to vaping and reduce the overall appeal of e-cigarettes. We strongly encourage the government to move forward with this legislation and remain dedicated to ensuring the health and safety of youth.

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<sup>4</sup> Canadian Lung Association. "New Vaping Regulations a Positive Step Towards a Nicotine-Free Generation." [New vaping regulations: Steps in the right direction | Canadian Lung Association](#)

<sup>5</sup> Drug Use Trend Report 2023." Ontario Student Drug Use and Health Survey, Centre for Addiction and Mental Health (CAMH). <https://www.camh.ca/en/>.

<sup>6</sup> Truth Initiative. "Mental Health and Nicotine Resources." 2023. <https://truthinitiative.org/mental-health-and-nicotine-resources>.

<sup>7</sup> Association Between E-Cigarette Use and Future Combustible Cigarette Use: Evidence from a Prospective Cohort of Youth and Young Adults, 2017–2019." ScienceDirect. [Association between e-cigarette use and future combustible cigarette use: Evidence from a prospective cohort of youth and young adults, 2017–2019 - ScienceDirect](#)



Yours truly,

BOARD OF HEALTH FOR THE HALIBURTON,  
KAWARTHA, PINE RIDGE DISTRICT HEALTH UNIT

David Marshall  
Chair, Board of Health  
Haliburton, Kawartha, Pine Ridge District Health Unit  
Encl.

Cc: Honourable Michael Tibollo, Associate Minister of Mental Health and Addictions  
Dr. Kieran Moore, Chief Medical Officer of Health  
Honourable David Piccini, MPP, Northumberland-Peterborough South  
Laurie Scott, MPP, Haliburton-Kawartha Lakes-Brock  
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Association of Local Public Health Agencies