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**IMPERIAL TOBACCO CANADA TO HEALTH CANADA:
PROPOSED VAPOUR FLAVOUR BAN IS NOT SUPPORTED BY SCIENCE, WILL BE
INEFFECTIVE AND WILL UNDERMINE PUBLIC HEALTH GOALS**

COMPANY URGES REGULATOR TO MAINTAIN FLAVOURED VAPOUR PRODUCTS

Montreal (Quebec) – September 2, 2021 – In its submission filed today, Imperial Tobacco Canada outlines the risks to public health posed by Health Canada’s proposal to ban most flavoured vapour products and calls on them to instead support effective measures that advance harm reduction and limit youth access.

The proposed flavour ban is evidently draconian. According to Health Canada’s own estimate at least 80% of current vapour flavours will have to be taken off the market in the event that their current proposal becomes law.

Evidence demonstrates that the widespread availability and use of flavoured vapour products has been an important factor in the large numbers of cigarette smokers switching to vapour products. Flavoured vapour products are an essential element of the harm reduction offering, as they satisfy the preferences of adult smokers looking for a reduced risk* alternative to traditional cigarettes.

Since vapour products were legalised in Canada in 2018, there has been widespread and increasing misperceptions about them that has resulted in increased opposition to the entire product category, much of it related to youth usage.

“Let me be clear, we agree that youth should not vape. But the proposed flavour restrictions will do nothing to dissuade youth from vaping and will only encourage adult vapers to return to smoking, not to mention the likely re-emergence of the illicit vapour market and tampering with devices and home-mixing of e-liquids” said Eric Gagnon, Vice President, Corporate and Regulatory Affairs at Imperial Tobacco Canada.

Health Canada’s own analysis demonstrates that most adult vapers prefer the flavours it is seeking to ban. Furthermore, Health Canada readily admits its proposed restrictions will lead some vapers to return to smoking or dissuade existing smokers from switching.

“Getting more smokers who would otherwise continue to smoke to switch to vaping should be a key public health goal, not the opposite, and that is what we are seeing from more progressive governments elsewhere in the world,” stated Gagnon.

Health Canada’s proposed ban on all flavours except tobacco, mint and menthol exists in stark contrast to the approaches adopted by leading proponents of tobacco harm reduction, such as the United Kingdom. In the UK, a wider range of flavours are allowed, including fruit, and regular vaping amongst youth remains low¹. Imperial Tobacco Canada’s submission highlights a number of studies that point to the importance of vapour flavours in supporting adult smokers to switch.

“Around the world we’ve got organisations like Public Health England stating that vaping is 95% less harmful than smoking, and multiple scientific reports that demonstrate that flavours play an important role in migrating smokers away from tobacco. But here in Canada excessive regulation and misinformation have resulted in the public believing vaping to be worse than smoking. Health Canada’s own website states that vaping is less harmful than smoking,² yet they choose to undermine vaping’s harm reduction potential by banning flavours. This is not only scientifically wrong; it goes against Health Canada’s mandate and will damage public health,” said Mr. Gagnon.

Imperial Tobacco Canada maintains there are better solutions to address youth vaping that do not undermine public health, including stricter enforcement of the current laws and leveraging smart technology. Imperial Tobacco Canada’s submission highlights a range of other solutions to mitigate youth vaping including: mandatory training programs for all retailers, robust age verification processes for all sales (including online) and deliveries of vapour products and strong enforcement and penalty regimes for retailers and other third parties.

“There is no compelling evidence that Health Canada’s flavour ban will significantly reduce youth vaping,” explained Mr. Gagnon. “But we know that retail enforcement programs are effective, and cutting-edge technology can further reduce youth access to vapour products. If Health Canada is serious about both harm reduction and limiting youth access, they would embrace the science and technology instead of introducing damaging and ill-advised restrictions.”

¹ <https://ash.org.uk/wp-content/uploads/2021/07/Use-of-e-cigarettes-among-young-people-in-Great-Britain-2021.pdf>

*Based on the weight of evidence and assuming a complete switch from cigarette smoking. These products are not risk free and are addictive.

² <https://www.canada.ca/en/health-canada/services/smoking-tobacco/vaping/smokers.html>

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