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Woodstock, ON
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September 11, 2019

christine.elliott@ontario.ca

The Honourable Christine Elliott
Minister of Health
College Park 5th Floor
777 Bay St.
Toronto, ON M7A 2J3

Dear Honourable Christine Elliott:

Re: Expanding alcohol retail outlets

The Government of Ontario continues to outline their plans to increase the accessibility of beverage alcohol in Ontario. Recently, the province announced plans to introduce legislation to end the near monopoly on beer sales and expand alcohol sales to corner, big-box, and more grocery stores, resulting in more retail outlets. Research has long established that increasing access to alcohol is related to a subsequent increase in alcohol use and, in turn, alcohol related harms (e.g., alcohol-related diseases, injuries, violence, crime, and traffic crashes). Therefore, this proposed change to legislation is concerning considering alcohol use is already a leading preventable cause of morbidity and mortality in Ontario.

Where alcohol privatization and deregulation has occurred elsewhere in Canada (e.g. Alberta and British Columbia), alcohol availability has risen significantly, with subsequent increases in consumption and related harms.^{1,2,3} Additionally, following the 2015 partial deregulation of alcohol sales in Ontario, increases in the number of alcohol outlets and longer average hours of operation were positively associated with increased emergency department visits attributable to alcohol.⁴ Alcohol costs to the individual and society are significant. A recently published document shows that alcohol costs Ontario \$5.34 Billion for healthcare, lost productivity, criminal justice and other direct costs.⁵

Furthermore, it is important to consider that the impacts of increased alcohol availability may disproportionately impact vulnerable populations. In British Columbia, privatization is associated to reduced compliance with age of sale policies, which can be observed by the low rates of compliance in privatized stores in comparison to government stores.⁶ The implication is that the sale of alcohol becomes easier for underage drinkers, increasing the risk of alcohol-related harms for a population that is already considered especially vulnerable to the negative impacts of alcohol.

We are requesting the Ontario government consider the impact of increasing the number of retail outlets on the health and safety of Ontarians before moving forward with more legislative changes.

We also request the Ontario Government consider the following recommendations proposed by the Council of Ontario Medical Officers of Health and The Centre for Addiction and Mental

Health to mitigate the potential harms associated with new policy and regulatory changes to increase alcohol availability in Ontario. We believe it is possible to create a culture of lower risk alcohol use in Ontario that balances interests in public health, government revenue, economic development and consumer preference.

Some measures we request be implemented include:

- Regulate retail availability, including the density, location, hours of sale, and access restrictions.
- Give municipalities the authority to restrict outlet density and hours and days of sale.
- Conduct a risk-based assessment for every tailgating event.
- Ensure operational compliance by expanding the current Mystery Shopper Program to encompass bi-annual visits to every alcohol outlet with publicly reported penalties that escalate with repeat offences.
- Conduct annual education visits to retail outlets.
- Implement pricing policies that will increase provincial revenue while also reducing alcohol-related harms.

Now is the time for Ontario to take leadership and address the harms of alcohol use. Therefore, as outlined in the government's report, we are interested in ensuring the government work with public health experts to ensure increasing convenience does not lead to increased social and healthcare costs related to alcohol. Thank you for your consideration.

Sincerely,



Larry Martin
Chair, Board of Health

- c. The Honourable Doug Ford, Premier of Ontario
Ernie Hardeman, MPP, Oxford
Jeff Yurek, MPP, Elgin-Middlesex-London
Pegeen Walsh, Executive Director, Ontario Public Health Association
Loretta Ryan, Executive Director, Association of Local Public Health Agencies
Association of Local Public Health Agencies
Ontario Boards of Health
Area municipalities served by Southwestern Public Health

References

1. Flanagan, G. Sobering Result: The Alberta liquor retailing industry ten years after privatization. Canadian Centre for Policy Alternatives and Parkland Institute; 2003. Retrieved from: https://www.policyalternatives.ca/sites/default/files/uploads/publications/National_Office_Pubs/sobering_result.pdf
2. Statistics Canada (2015). Impaired driving in Canada, 2015. Retrieved from: <https://www150.statcan.gc.ca/n1/en/daily-quotidien/161214/dq161214b-eng.pdf?st=ZXKFqtLj>.
3. Solomon, R., Cardy, J. Noble, I., & Wulkan, R. Mapping Our Progress to Safer Roads: The 2012 Provincial and Territorial Legislative Review. London, ON; MADD; 2012. Retrieved from: http://www.madd.ca/media/docs/MADD_Canada_2012_Provincial_and_Territorial_Legislative_Review_FINAL.pdf.
4. Myran, DT, Chen JT, Giesbrecht N, Rees, VW. The association between alcohol access and alcohol-attributable emergency department visits in Ontario, Canada. *Addiction*. 2019;114(7), 1183-91.
5. Canadian Substance Use Costs and Harms Scientific Working Group. Canadian Substance Use Costs and Harms in the Provinces and Territories (2007–2014). Ottawa, ON: Canadian Centre on Substance Use and Addiction; 2018. Available from: <http://csuch-cemusc.ccsa.ca/Resource%20Library/CSUCH-Canadian-Substance-Use-Costs-Harms-Provincial-Territorial-Report-2018-en.pdf>
6. MADD. Provincial Liquor Boards: Meeting the Best Interests of Canadians. 2014. Retrieved from: http://www.madd.ca/media/docs/MADD_Canada_Provincial_Liquor_Boards.pdf.
7. Centre for Addiction and Mental Health (2019). Alcohol Policy Framework. Toronto: CAMH.



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September 18, 2019

The Honourable Christine Elliott
Deputy Premier
Minister of Health
Ministry of Health and Long-Term Care
5th Floor, 777 Bay St.
Toronto, ON M7A 2J3

Dr. David Williams
Chief Medical Officer of Health
Ministry of Health and Long-Term Care
21st Floor, 393 University Avenue
Toronto, ON M7A 2S1

Attention: The Honourable Minister Elliott and Dr. David Williams, Chief Medical Officer of Health

Dear Minister Elliott and Dr. Williams:

Re: Provincial Plans for the Modernization of Public Health Service Delivery

During its meeting on September 4, 2019, the County of Lambton Board of Health received a staff report dated August 22, 2019 regarding *Provincial Plans for Modernization of Public Health Service Delivery*. As a result of those discussions, the Board of Health passed the following motion:

#7: Marriott/Stark:

- b) *That the Warden, as Chair of the Board of Health, write a letter to the Minister of Health, Chief Medical Officer of Health, all Ontario Boards of Health, and the Association of Local Public Health Agencies, to request the following:*
- a) *That the geographic area of the restructured public health entity include only the geographic area of Lambton County;*
 - b) *That any changes in the cost-shared formula for public health be phased in over five years commencing in fiscal 2021-22; and highlight opposition to the cost-sharing changes which are estimated to increase the tax levy contributions to Lambton Public Health in the range of \$1.1 million;*

- c. *That the governance and operating model of the restructured public health entity maintain the integrated service model which currently exists for Lambton Public Health, to continue leveraging all of the municipal activities towards addressing the social determinants of health;*
- d. *That the Province delay the implementation of any organizational and financial changes to local public health until no earlier than April 1, 2021, with a commitment to engage in meaningful consultation with Lambton County Council over the next 18 months; and*
- e. *That the core functions of public health, including population health assessment and surveillance, promotion of health and wellness, disease prevention, health protection and emergency management be protected.*

Carried

Public Health as a Department of the County has proved that it is a good manager of services, and a valuable partner with the Province, capable of living within its means. Because Lambton County has for two decades been sharing of administrative resources and internal support services such as: payroll, human resources, IT, legal, purchasing, etc., many of the cost savings the Province expects to realize here have already been achieved.

In closing, we believe strongly that Lambton County's service model is nimble and effective and that the Provincial government's plan to regionalize local public health units will have significant impacts. The Province's plan will significantly reduce and dilute the ability of Lambton County to have a say and input towards local health planning and service delivery. The strength of public health lies in its local connectedness. Public health needs to remain local to continue the positive work it does in contributing to strong and healthy communities.

Sincerely,



Warden Bill Weber
Chair, County of Lambton Board of Health

cc: Bob Bailey, MPP, Sarnia-Lambton
Monte McNaughton, MPP, Lambton-Kent-Middlesex
Linda Stewart, Executive Director, Association of Local Public Health Agencies
Ontario Boards of Health
Dr. Ranade, Medical Officer of Health
Andrew Taylor, General Manager

September 18, 2019

Honourable Ginette Petitpas Taylor
Minister of Health of Canada
House of Commons
Ottawa, ON K1A 0A6

Honourable Christine Elliott
Minister of Health 10th Floor, Hepburn Block
80 Grosvenor Street
Toronto, Ontario M7A 2C4

Dear Ministers:

On September 18, 2019 the Board of Health for the Simcoe Muskoka District Health Unit approved a motion to write to the Ontario and the federal Ministers of Health calling for stringent restrictions on the display and promotion of vaping products and to ban flavoured e-cigarettes to help prevent the further uptake of vaping (and with it, the potential risk of smoking commencement) by youth.

Vaping has been rapidly increasing in our youth. A 74% increase in vaping among youth aged 16-19 in Canada was reported from 2017 to 2018 (jumping to 14.6% from 8.4%).¹ Cigarette smoking in the same period increased 45% to reach 15.5% of youth in this age group from 10.7% a year earlier. This is a concerning given that surveys initiated prior to 2018 had reported an ongoing decline in youth smoking; a finding which is consistent with the conclusions of research suggesting that vaping increases the risk of smoking in youth.² Research has also demonstrated that marketing of vaping products at retail stores is associated with youth and young adult initiation of vaping.³

Although vaping is likely to be less harmful than smoking, vaping is not harm free. Vaping can cause ear, eye, and throat irritation. The fine particles and chemicals that are inhaled into the lungs can aggravate existing lung conditions making it harder to breath.⁴ The risk of heart attack increases with vape use and using both cigarettes and e-cigarettes increases this risk further.⁵ Nicotine addiction is a significant concern associated with youth vaping. Nicotine can change how the teenage brain develops

¹ Hammond, D., Reid, J.L., Rynard, V.L., Fong, G.T., Gummings, K.M., McNeill, A., & O'Conner, R. (2019). Prevalence of vaping and smoking among adolescents in Canada, England, and the United States: repeat national cross sectional surveys. *Bjm*, 365, 12219.

² <http://nationalacademies.org/hmd/Reports/2018/public-health-consequences-of-e-cigarettes.aspx>

³ Loukas, A, Paddock, M., Li, S., Harrell, M., Pasch, E., Perry, C (2019) Electronic Nicotine Delivery Systems Marketing and Initiation Among Youth and Young Adults

⁴ Health Canada. (2019-02-04). Vaping: Get the Facts.

⁵ Hess, CA., Olmedo, P., Navas-Acien, A., Goessier, W., Cohen, JE., & Rule, AM. E-cigarettes as a source of toxic and potentially carcinogenic metals. *Environmental Research*, 2017; 152:221 DOI: 10. 1016/j.envres.2016.09.026

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affecting cognitive functions like memory and concentration as well as impulse control and can cause behavioural problems⁶.

A number of serious lung issues associated with vaping occurring in the United States with an unknown etiology has also recently been reported. Health Canada warned in a recent safety alert that vaping products can carry a risk of pulmonary illness. This follows five recent deaths in the U.S. that have been linked to vaping. Health Canada reported that no similar pulmonary illness incidents have been reported in Canada, but the agency is in communication with the Centre for Disease Control (CDC) who is investigating 450 cases in 33 states which involve e-cigarettes or other vaping product use.⁷

Complicating matters further in lieu of regulation and restriction are flavoured vapour products. There are over 7000 flavours of e-juice available including candy and fruit flavoured varieties with names that appeal to youth.⁸ There is a strong body of evidence to support that flavours attract youth to e-cigarette use where research concludes that flavour influences youth to try and buy e-cigarettes and the appeal of ads promoting flavours is linked to uptake of vaping by youth.⁹

Presently, there are limited federal restrictions associated with the marketing and promotion of e-cigarettes. Unlike cigarettes, vaping advertising is currently permitted on main stream media including television, radio, newspapers, outdoor signs, print and billboards. There are some regulations to protect youth related to the sale, promotion and flavour of vaping products; however, these regulations are clearly not adequate to stem the increasing uptake of vaping by youth.

Provincially, the Smoke-Free Ontario Act, 2017 (SFOA, 2017) originally put comprehensive restrictions on the display and promotion of vaping products similar to tobacco. However, those restrictions were not implemented by the Ontario provincial government before the SFOA, 2017 was enacted. As a result, point of sale display and promotion of vapour products at corner convenience stores, gas stations and grocery chains is widespread and promotional materials from posters to three-dimensional cutouts and packaging displays.

In order to prevent a further increase of vaping among youth and non-smokers in Simcoe Muskoka and to prevent the associated possible risk of cigarette smoking uptake, bans on the display and promotion of vapour products at both the Federal and Provincial level are required immediately. Provincially, the Smoke-Free Ontario Act regulations need to be strengthened to include a ban on flavoured vape products, as well on the display and promotion of vapour products mirroring the ban on tobacco products. Federally, the Tobacco and Vaping Products Act (TVPA) should also be revised to ban display, promotion and advertising, also mirroring the restrictions on tobacco in the TVPA.

⁶ England, L.J., Bunnell, R.E., Pechacek, T.F., Tong, V.T. and McAfee, T.A., 2015. Nicotine and the developing human: a neglected element in the electronic cigarette debate. *American journal of preventive medicine*, 49(2), pp.286-293.

⁷ https://www.cdc.gov/tobacco/basic_information/e-cigarettes/severe-lung-disease.html

⁸ Zhu SH, Sun JY, Bonnevie E, Cummins SE, Gamst A, Yin L, Lee M. Four hundred and sixty brands of e-cigarettes and counting: implications for product regulation. *Tobacco Control*, 2014 Jul 1;23(suppl 3):iii3-9

⁹ Vasiljevic M, Petrescu DC, Marteau TM. Impact of advertisements promoting candy-like flavoured e-cigarettes on appeal of tobacco smoking among children: An experimental study, *Tobacco Control*, 2016;25(e2):e107-e112.

Thank you for your attention to this very important matter for the protection of the health of our youth.

Sincerely,

ORIGINAL Signed By:

Anita Dubeau
Board of Health Chair

Cc: Ontario Boards of Health
Association of Local Public Health Agencies
Ontario Public Health Association
Ontario Tobacco Research Unit
Ontario Campaign for Action on Tobacco
Municipal Councils of Simcoe Muskoka
Members of Parliament in Simcoe Muskoka
Members of Provincial Parliament in Simcoe Muskoka
Central Local Health Integration Network
North Simcoe Muskoka Local Health Integration Network

September 19, 2019

Honourable Christine Elliott
Deputy Premier and Minister of Health
Hepburn Block
10th Floor
80 Grosvenor Street
Toronto, ON M7A 1E9
Sent via email: christine.elliott@pc.ola.org

Dear Minister Elliott

RE: Immunization for School Children – Seamless Immunization Registry

At its meeting held on September 19, 2019, the Board of Health for the Haliburton, Kawartha, Pine Ridge District Health Unit discussed correspondence received from York Region with regard to protecting school-age children through immunization.

York Region's Regional Council adopted the following recommendations on May 16, 2019.

- Regional Council endorse the position of the Council of Ontario Medical Officers of Health in support of a seamless immunization registry whereby health care providers directly input immunization information at the time of vaccine administration.

Immunizing children is one of the safest and most effective ways to prevent illness and death from many serious contagious diseases. Vaccines are one of the most cost-effective health interventions in modern medicine.

An electronic system of immunization registry is of critical importance for centralizing data records. Accessing immunization data through Electronic Medical Records (EMR) and the Digital Health Immunization Repository (DHIR) Integration Project will allow for safe, reliable and seamless access for health care providers to report immunizations directly to public health. This will not only save health care dollars in the long term but will provide an integrated system that will be more efficient and effective.

.../2

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Fax · 705-457-1336

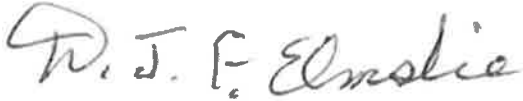


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Minister Elliott
September 19, 2019
Page 2

We appreciate your support for this important public health initiative.

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

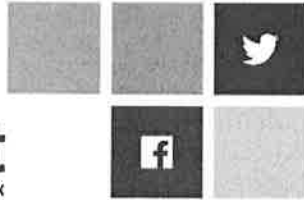
A handwritten signature in black ink that reads "D. J. F. Elmslie". The signature is written in a cursive style with a large initial "D".

Doug Elmslie, Chair, Board of Health

DE/aa

Cc (via email): The Hon. Doug Ford, Premier
 Jamie Schmale, MP, Haliburton-Kawartha Lakes-Brock,
 Kim Rudd, MP, Northumberland-Peterborough South
 The Hon. Laurie Scott, MPP Haliburton-Kawartha Lakes-Brock
 David Piccini, MPP Northumberland-Peterborough South
 Dr. David Williams, Ontario Chief Medical Officer of Health
 Dr. Paul Roumeliotis, Chair, Council of Medical Officers of Health
 Ontario Boards of Health
 Loretta Ryan, Association of Local Public Health Agencies

Attachment



September 27, 2019

The Honorable Christine Elliott
Minister of Health and Long-Term Care
Hepburn Block 10th Floor
80 Grosvenor Street
Toronto, ON M7A 1E9

Dear Minister Elliott:

On September 19, 2019, the Windsor-Essex County Board of Health passed the following Resolution regarding the **Completion of Consumption and Treatment Services Application and Site Location** to address rising rates of opioid use in Windsor and Essex County.

PROPOSED MOTION

Whereas the Government of Ontario announced its funding commitment and endorsement of Consumption and Treatment Services in October 2018, and

Whereas Windsor and Essex County is experiencing significant public health concerns related to the use of opioids and other substance use, including illnesses, deaths, blood borne infections, and public discarding of used needles, and

Whereas Consumption and Treatment Services have the potential to address such public health issues, in addition to reducing health care costs, and

Whereas the Windsor-Essex County Health Unit's (WECHU) lead role in the Windsor-Essex Community Opioid Strategy and understanding of harm-reduction services in the community, creates an opportunity for the WECHU to lead the successful completion of a comprehensive and collaborative application for Consumption and Treatment Services in our community, and

Whereas the results of the WECHU-led *Supervised Injection Services Community Consultations Report* demonstrate support and openness among the general public, key stakeholders, and people who inject drugs for an SIS in WEC, and

Whereas the final submission of a CTS application as well as the application for an exemption to the federal *Controlled Drugs and Substances Act* requires community consultation and the selection of a proposed location in which to operate.

Now therefore be it resolved that the Windsor-Essex County Board of Health supports the submission of a *Consumption and Treatment Services Application* for the City of Windsor to the Ministry of Health, including the submission of an *Exemption for Medical Purposes under the Controlled Drugs and Substances Act for Activities at a Supervised Consumption Site Application* required by Health Canada, and

FURTHER THAT an additional comprehensive community consultation be conducted by the Windsor-Essex County Health Unit to determine a suitable and accessible location for a CTS in the City of Windsor.

We would be pleased to discuss this resolution with you and thank you for your consideration.

Sincerely,

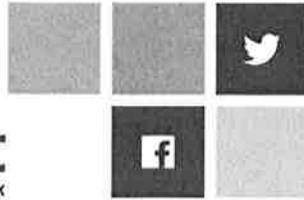


Gary McNamara
Chair, Board of Health



Theresa Marentette
Chief Executive Officer

c: Hon. Doug Ford, Premier of Ontario
Hon. Christine Elliott, Minister of Health & Long-Term Care
Hon. Ginette Petitpas Taylor, Minister of Health
Chris Harold, Ministry of Health, Manager, Addiction and Substances Policy and Programs
Hon. David Lametti, Minister of Justice and Attorney General of Canada
Dr. David Williams, Chief Medical Officer of Health, Ministry of Health & Long Term Care
Pegeen Walsh, Executive Director, Ontario Public Health Association
Centre for Addiction and Mental Health
Association of Local Public Health Agencies – Loretta Ryan
Ontario Boards of Health
WECHU Board of Health
Corporation of the City of Windsor – Clerk's office
Corporation of the County of Essex – Clerk's office
Local MPP's – Percy Hatfield, Lisa Gretzky, Taras Natyshak, Rick Nicholls
Local MP's – Brian Masse, Cheryl Hardcastle, Tracy Ramsey



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Essex 360 Fairview Avenue West, Suite 215, Essex, ON N8M 3G4
Leamington 33 Princess Street, Leamington, ON N8H 5C5

September 27, 2019

The Honorable Rod Phillips
Minister of Finance
Frost Building South
7th Floor
7 Queen's Park Cres.
Toronto, ON M7A 1Y7

Dear Minister Phillips:

Council of Ontario Medical Officers of Health – Alcohol Choice & Convenience

On behalf of the Windsor-Essex County Board of Health we are writing to you in support of a letter we received from Dr. Chris Mackie, Chair, Council of Ontario Medical Officers of Health (COMOH) opposing **expanding alcohol retail sales in Ontario**.

Dr. Mackie refers to the Governments release of *The Case for Change: Increasing Choice and Expanding Opportunity in Ontario's Alcohol Sector* Report, and, in particular to Recommendation 8 of the Report stating, "the government should work with retailers, beverage alcohol manufacturers and public health experts to ensure increasing convenience does not lead to increased social costs related to alcohol".

The Windsor-Essex County Health Unit fully supports the above recommendation, and thanks you for your consideration.

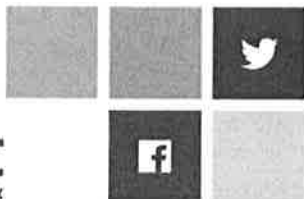
Sincerely,

Gary McNamara, Chair
Chair, Board of Health

Theresa Marentette
Chief Executive Officer

c: Premier Doug Ford
Ontario Boards of Health
Dr. David Williams, Chief Medical Officer of Health, MOHLTC
Council of Medical Officers of Health (COMOH)
Local MPP's – Percy Hatfield, Lisa Gretzky, Taras Natyshak, Rick Nicholls

Hon. Christine Elliott
Loretta Ryan, Association of Local Public Health Units
WECHU Board of Health
Local MP's – Brian Masse, Cheryl Hardcastle, Tracy Ramsey



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September 27, 2019

The Honorable Todd Smith
Minister of Children, Community and Social Services
Hepburn Block
6th Floor, 80 Grosvenor St.
Toronto, ON M7A 1E9

Dear Minister Smith:

Changes to Provincial Autism Supports

On behalf of the Windsor-Essex County Board of Health we are writing to you in support of a letter from Peterborough Public Health where they received a delegation at their June 12, 2019 Board of Health meeting who provided a detailed presentation of the planned changes to the Ontario Autism Program.

The Windsor-Essex County Board of Health supports the province's plan to address long waiting lists and to expand Ontario's five autism diagnostic hubs.

Children on the waitlist will transition to Childhood Budgets with direct funding that will include behavioural services, including assessments and consultations, speech language pathology, occupational therapy and physiotherapy as well as family/caregiver capacity building and training, respite services, technology aids and travel.

We also share Peterborough Public Health's concern that through these changes funding will be provided directly to families rather than towards a provision of evidence-based programs. We also believe that amounts should be based on a child's need and not their age. Children with autism benefit from appropriate interventions from qualified practitioners (i.e. needs-based supports).

The Windsor-Essex County Health Unit supports the above recommendation, and thanks you for your consideration.

Sincerely,

Handwritten signature of Gary McNamara.

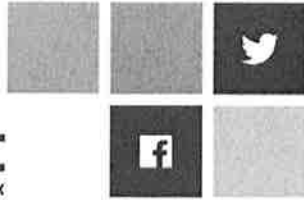
Gary McNamara, Chair
Chair, Board of Health

Handwritten signature of Theresa Marentette.

Theresa Marentette
Chief Executive Officer

c: Premier Doug Ford
Hon. Steven Lecce, Minister of Education
Loretta Ryan, Association of Local Public Health Units
WECHU Board of Health
Margaret Spoelstra, Co-Chair, Ontario Autism Advisory Panel
Corporation of the City of Windsor – Clerk's office
Local MP's – Brian Masse, Cheryl Hardcastle, Tracy Ramsey

Hon. Christine Elliott, Minister of Health
Ontario Boards of Health
Dr. David Williams, Chief Medical Officer of Health, MOHLTC
Council of Medical Officers of Health (COMOH)
Dr. Marie Bountrogianni, Co-Chair, Ontario Autism Advisory Panel
Corporation of the County of Essex – Clerk's office
Local MPP's – Percy Hatfield, Lisa Gretzky, Taras Natyshak, Rick Nicholls



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September 27, 2019

The Honorable Christine Elliott
Minister of Health and Long-Term Care
Hepburn Block 10th Floor
80 Grosvenor Street
Toronto, ON M7A 1E9

Dear Minister Elliott:

Public Mental Health – Parity of Esteem Position Statement

On behalf of the Windsor-Essex County Board of Health we are writing to you in support of a letter we received from Public Health Sudbury and Districts formally adopting the **Parity of Esteem Position Statement**. This Position Statement asserts that public health equally values mental and physical health.

At its meeting on May 16, 2019, the Sudbury and Districts Board of Health carried the following resolution #15-19:

Whereas the Board of Health for Public Health Sudbury & Districts recognizes that there is no health without mental health; and

Whereas Public Health Sudbury & Districts intentionally adopts the term, public mental health, to redress the widespread misunderstanding that public health means public physical health;

Therefore be it resolved that the Board of Health for Public Health Sudbury & District endorse the Public Mental Health – Parity of Esteem Position Statement, May 16, 2019.

The Windsor-Essex County Health Unit fully supports the above recommendation, and thanks you for your consideration.

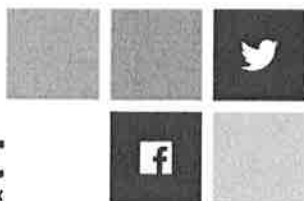
Sincerely,

Gary McNamara, Chair
Chair, Board of Health

Theresa Marentette
Chief Executive Officer

c: Premier Doug Ford
Loretta Ryan, Association of Local Public Health Units
WECHU Board of Health
Council of Medical Officers of Health (COMOH)
Local MPP's – Percy Hatfield, Lisa Gretzky, Taras Natyshak, Rick Nicholls

Ontario Boards of Health
Dr. David Williams, Chief Medical Officer of Health, MOHLTC
Ms. Pagen Walsh, Executive Director, Ontario Public Health Agencies
Local MP's – Brian Masse, Cheryl Hardcastle, Tracy Ramsey



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September 27, 2019

The Honorable Christine Elliott
Minister of Health and Long-Term Care
Hepburn Block 10th Floor
80 Grosvenor Street
Toronto, ON M7A 1E9

Dear Minister Elliott:

Funding Cancelled for Leave the Pack Behind

On behalf of the Windsor-Essex County Board of Health we are writing to you in support of a letter we received from Peterborough Public Health where they expressed concern at their June 12, 2019 Board of Health meeting over the provincial government's decision to cease funding for *Leave the Pack Behind*.

After 19 years, since the year 2000, of helping young adults quit smoking at campuses across Ontario, *Leave The Pack Behind* learned in a phone call that its funding had actually ended weeks ago — a casualty of Ontario Premier Doug Ford's quest to reduce the province's \$348-billion debt.

Leave The Pack Behind has expanded to 44 post-secondary institutions, worked with 35 public-health units and helped 40,600 people quit smoking, according to Kelli-an Lawrance, the group's director and Associate Professor of Health Sciences at Brock University. She credited the group's success to working with young people to design campaigns that appeal to their peers, as well as the fact *Leave the Pack Behind* offers support via social media campaigns, counselling, phone apps and online tips.

Leave The Pack Behind created an environment that supported and inspired all young adults to live their best life, tobacco-free by fulfilling their mission in 4 ways:

1. Help young adults access free quitting methods that work
2. Advocate for healthy, smoke-free spaces
3. Disrupt the social acceptance of cigarettes and alternative tobacco products
4. Build and share knowledge about how to help young adults avoid and quit smoking

The group was one of the lead authors of Make our Campus Smoke-Free, a manual for students aimed at helping them organize anti-smoking campaigns tailored to the circumstances of their school and student body. The guide has also been adopted by students in other provinces.

The Windsor-Essex County Health Unit supports the above recommendation, and thanks you for your consideration.

Sincerely,



Gary McNamara, Chair
Chair, Board of Health



Theresa Marentette
Chief Executive Officer

c: Premier Doug Ford
Loretta Ryan, Association of Local Public Health Units
WECHU Board of Health
Corporation of the City of Windsor – Clerk's office
Council of Medical Officers of Health (COMOH)
Local MPP's – Percy Hatfield, Lisa Gretzky, Taras Natyshak, Rick Nicholls

Ontario Boards of Health
Dr. David Williams, Chief Medical Officer of Health, MOHLTC
AMO – Association of Municipalities of Ontario
Corporation of the County of Essex – Clerk's office
Local MP's – Brian Masse, Cheryl Hardcastle, Tracy Ramsey

September 27, 2019

The Honourable Christine Elliott, Deputy Premier
Minister of Health
Hepburn Block 10th Floor
80 Grosvenor Street
Toronto, ON M7A 1E9

Dear Minister Elliott:

Recent reports of severe pulmonary illness associated with vaping in the United States and Ontario give rise to concerns about the use of these products, especially among youth. As such, at the September 25, 2019 meeting of the KFL&A Board of Health, the following motion was passed:

THAT the KFL&A Board of Health urge the Provincial Government to immediately remove Regulation 268 of the Smoke-Free Ontario Act, 2017, so that retailers of vaping products will not be allowed to promote them and so that the promotion and display of vape products are subject to the same prohibition as tobacco products.

Vaping rates among youth have been rising in Canada. In 2017, almost one in four Canadian youth (aged 15-19) reported having tried an e-cigarette. Rising youth use of e-cigarettes is especially concerning given the impact of nicotine on the developing brain.

Youth and young adults in Ontario are frequently exposed to vaping advertising on the internet, in convenience stores and gas stations, as well as on television, magazines, billboards, and public transit. Exposure to e-cigarette marketing and advertising has been associated with lower harm perceptions and increased odds of trying e-cigarettes.

Immediate action is needed to curb the impacts of vaping given the increasing vaping rates among youth, widespread promotion of vaping products, and emerging concerns about vaping-related pulmonary illness. Display and promotion of vaping products should align with current restrictions on tobacco products.

Provincially, section 4.1 of the Smoke Free Ontario Act, 2017, prohibits both the display and promotion of vapour products in any place where vapour products are sold or offered for sale (2018, c. 12, Sched 4, s.3). However, regulation 268 outlines exemptions which allow for promotion of vapour products in speciality vape stores and in retail locations that sell vapour products (O. Reg 439/18, s.4).

Kingston, Frontenac and Lennox & Addington Public Health

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KFL&A
Public Health

The KFL&A Board of Health strongly urges the provincial government to remove Regulation 268 of the Smoke-Free Ontario Act, 2017 to restrict the marketing of vapour products to align with the advertisement of tobacco products. Such urgent action is needed to protect the health of youth in Ontario.

Sincerely,

Denis Doyle, Chair
KFL&A Board of Health

Copy to: *Ian Arthur, MPP Kingston and the Islands*
Randy Hillier, MPP Lanark-Frontenac-Kingston
Daryl Kramp, MPP Hastings-Lennox and Addington
Mark Gerretsen, MP Kingston and the Islands
Scott Reid, MP Lanark-Frontenac-Kingston
Mike Bossio, MP Hastings-Lennox and Addington
Ginette Petitpas Taylor, Minister, Health Canada
Dr. David Williams, Chief Medical Officer of Health, Ministry of Health
Dr. Theresa Tam, The Chief Public Health Officer
Loretta Ryan, Association of Local Public Health Agencies
Ontario Boards of Health

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October 1, 2019

The Honourable Christine Elliott
Minister of Health
10th Floor, Hepburn Block
80 Grosvenor Street
Toronto, ON M7A 2C4
Sent via e-mail: christine.elliott@pc.ola.org

Dear Minister Elliott,

Re: Addressing the Opioid Emergency in Ontario - Recommendations from the Association of Municipalities of Ontario

As Ontario develops its Mental Health and Addiction strategy, Peterborough's board of health hopes that there will be specific attention paid to the opioid crisis that has emerged over the years, fueled by increased rates of opioid prescribing and only made worse by the contamination of the illicit drug supply by fentanyl.

We believe that the recent submission, in September, of recommendations from the Association of Municipalities of Ontario¹ (AMO) presents your government with a comprehensive and carefully considered set of actions that we hope will be seriously considered. These were reviewed at the board's September meeting, with the subsequent decision that its support and endorsement for these recommendations be expressed to you.

The AMO recommendations contain four foundation actions for your government to consider:

- **That the opioid crisis be recognized as a priority**, with the appropriate attention and resourcing required to address it in a comprehensive and effective manner;
- That an **"all of government approach"** be used to ensure that upstream prevention of substance use and other components of the crisis are addressed;
- That, in order to ensure success, a **provincial coordinator** be identified who can focus solely on this one issue and broker the right relationships and partnerships required to achieve the needed results; and
- **Formal means** be established to allow for transparent, accountable and two-way communications.

In addition, the AMO recommendations outline specific strategies that a provincial coordinator would undertake as components of this comprehensive, all of government approach. Taken as a whole, they provide solid advice that has been gleaned from the front lines, from the evidence, and from provincial expertise. We hope that you will find the recommendations to provide helpful guidance as you further develop your response.

As Minister of Health, we look to you for your leadership during these challenging times. Peterborough's population has been hit hard, with opioid poisonings and deaths occurring at an alarming rate. In the first quarter of 2019, we experienced a confirmed death rate of 6.2 per 100,000, a rate much higher than the

provincial rate of 2.7 deaths per 100,000. We are concerned that more needs to be done but with the dissolution of the Central East LHIN board, we no longer have a common meeting place for the planning, coordination and prioritization of health sector services like these.

The strategy that we contributed to developing, through the Central East LHIN, will require updating and adaptation to ensure that we do not lose ground, but instead, continue to build on our successes to date. For example, more people are receiving timely and effective access to treatment for addictions, through our RAAM clinic. Since opening, the Peterborough RAAM clinic has seen over 400 new patients.² Of these, 35% were seeking help for opioid use.

Our board of health supports the need for enhanced treatment options for those who fail to respond to oral agonists and we hope that Ontario will provide our community with funded access to injectable opioid agonist treatment options. The recent publication of clinical and operational guidelines³ now make this a stronger possibility. We hope, too, that harm reduction efforts will be expanded to include supervised consumption as an opportunity to provide life-saving response and prevent deaths from poisonings. We hope that more people with addictions and mental illness will be diverted away from the criminal justice system and into treatment and harm reduction services. And we hope that people with lived experience of substance use will be included in the planning, delivery and evaluation of a comprehensive strategy to ensure that we can capitalize on their insights and build a response that is inclusive, barrier-free and life affirming.

Municipalities and local public health agencies are working together to ensure that communities are responsive to their local opioid emergencies, and that Naloxone is available to assist with reversing the deadly effects of acute poisonings. But we do not act in a vacuum and we will be unable to make a difference unless we can be part of a bigger, comprehensive, complex yet coordinated strategy. That is what the AMO recommendations address, and we wish to emphasize their utility and timeliness as you progress toward a provincial Mental Health and Addictions strategy. We congratulate AMO for convening a working group to prepare and present these recommendations to you, Minister Elliott. And we hope that they will provide you with the guidance you seek in order to ensure Ontario is meeting its obligation to protect the health of its residents.

Sincerely,

Original signed by

Councillor Kathryn Wilson
Chair, Board of Health

cc: Hon. Doug Ford, Premier of Ontario
Monika Turner, Director of Policy, Association of Municipalities of Ontario
Local MPPs
Local Municipal and First Nation Councils
Peterborough Drug Strategy
Association of Local Public Health Agencies
Ontario Boards of Health

¹ Addressing the Opioid Emergency in Ontario: Municipal Recommendations for a Municipal Response, AMO, September 4, 2019, accessed at <https://www.amo.on.ca/AMO-PDFs/Reports/2019/Addressing-the-Opioid-Overdose-Emergency-in-Ontari.aspx>

² Communications, September 30, 2019

³ Fairbairn N et al. Injectable opioid agonist treatment for opioid use disorder: a national clinical guideline. CMAJ 2019 September 23,191:E1049-56.doi: 10.1503/cmaj.190344

October 11, 2019

The Honourable Christine Elliott, Deputy Premier
Minister of Health
Hepburn Block 10th Floor
80 Grosvenor Street
Toronto, ON M7A 1E9

Dear Minister Elliott:

Re: Vapour Products Display and Promotion

The Kingston, Frontenac and Lennox & Addington (KFL&A) Board of Health is writing to you to express deep concerns about the on-going promotion of vaping products in Ontario.

While vapour products are generally regarded as safer than combustible tobacco cigarettes, these products are not risk-free and are known to contain and emit potentially toxic substances. KFL&A Board of Health is alarmed by the rising vaping rates among youth. The sharp increase in youth vaping rates is especially concerning given the availability and promotion of nicotine containing vapour products, the impact of nicotine on the developing brain, and the recent upward trending of cigarette smoking among this population. Our concerns are further compounded by the vaping related pulmonary disease reports emerging from the United States, Quebec and our own province.

A suite of robust regulatory measures is needed to address the rise in vapour product use and to protect our most vulnerable populations from the harms associated with these products. Because exposure to vapour products marketing and advertising decreases the perception of the associated risk of vaping and increases the odds of trying these products, immediate action is needed to limit youth's exposure to product promotion. Our youth and young adults are frequently being exposed to vaping advertising on the internet, at point of sale in convenience stores and gas stations, as well as on television, magazines, billboards, social media, and public transit. To that end, KFL&A Board of Health passed the following motion on 2019-09-25:

THAT the KFL&A Board of Health urge the Provincial Government to immediately remove Sections 21 and 22 of Regulation 268 of the Smoke-Free Ontario Act, 2017, so that retailers of vaping products will not be allowed to promote them and so that the promotion and display of vape products are subject to the same prohibition as tobacco products.

.../2

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KFL&A
Public Health

KFL&A Board of Health applauds the Government of Ontario's recently expressed concerns about youth vaping and the health risks and your willingness to find evidence-informed solutions to address this emerging public health issue.

Sincerely,

Denis Doyle, Chair
KFL&A Board of Health

Copy to: *Ian Arthur, MPP Kingston and the Islands*
Randy Hillier, MPP Lanark-Frontenac-Kingston
Daryl Kramp, MPP Hastings-Lennox and Addington
Mark Gerretsen, MP Kingston and the Island
Scott Reid, MP Lanark-Frontenac-Kingston
Mike Bossio, MP Hastings-Lennox and Addington
Ginette Petitpas Taylor, Minister, Health Canada
Dr. David Williams, Chief Medical Officer of Health, Ministry of Health
Dr. Theresa Tam, The Chief Public Health Officer
Loretta Ryan, Association of Local Public Health Agencies
Ontario Boards of Health

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October 16, 2019

Via E-mail: Ginette.PetitpasTaylor@parl.gc.ca

The Honourable Ginette Petitpas Taylor, Minister of Health
Health Canada
Address Locator 0900C2
Ottawa, ON K1A 0K9

Dear Minister Petitpas Taylor:

Re: Comprehensive measures to address the rise of vaping in Canada

The Kingston, Frontenac and Lennox & Addington (KFL&A) Board of Health is writing to you to express deep concerns about the rising vaping rates among youth and young adults in Canada. The sharp increase in youth vaping rates is especially concerning given the availability and promotion of vapour products containing nicotine, the impact of nicotine on the developing brain, and the recent upward trending of cigarette smoking among this population. Our concerns are further compounded by the vaping-related pulmonary disease reports emerging in the United States and Canada.

While vapour products are generally regarded as safer than combustible tobacco cigarettes, these products are not risk-free and are known to contain and emit potentially toxic substances. The emerging concerns surrounding vaping calls for a regulatory framework that provides equal protection for all Canadians.

A suite of robust measures is needed to address the rise in vapour product use and to protect our most vulnerable populations from the harms associated with these products. We applaud the Government of Canada's pursuit of an evidence-informed regulatory framework through the numerous public consultations conducted in 2019. KFL&A Public Health submitted the following regulatory recommendations through the consultation process:

- Prohibit all additives and non-tobacco flavours in vaping products and e-liquids.
- Require the listing of all ingredients on product labels and packaging.
- Require health and toxicity warnings on vapour products.
- Restrict nicotine concentration in all vaping products.
- Require standardized and tamper proof packaging on all vapour products.
- Require mandatory testing and reporting for vapour products.
- Strengthen the advertising and promotion control regime so that it aligns with tobacco controls.
- Develop a robust and sustainable monitoring and surveillance strategy to ensure compliance with advertising and promotion controls and to identify emerging products.

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*The Honourable Ginette Petitpas Taylor, Minister of Health
Health Canada*

Page 2

The appeal and popularity of vapour products is concerning given their potential health risks, and the rise of youth vaping cannot continue unabated. Like tobacco control, there is no silver bullet to address vaping and its risks. The KFL&A Board of Health urges the Government of Canada to expedite a comprehensive set of controls for vapour products like those regulating tobacco products and to consider other evidence-informed strategies such as taxation, use prohibition, industry denormalization, and effective public education and behaviour change campaigns to address this emerging public health issue.

Sincerely,

Denis Doyle, Chair
KFL&A Board of Health

*Copy to: Mark Gerretsen, MP Kingston and the Islands
Scott Reid, MP Lanark-Frontenac-Kingston
Mike Bossio, MP Hastings-Lennox and Addington
Loretta Ryan, Association of Local Public Health Agencies
Ontario Boards of Health*