

March 19, 2014

The Honourable Rona Ambrose
Minister of Health
House of Commons
Ottawa, Ontario
K1A 0A6

Re: Open letter to the Minister of Health on electronic cigarettes

Minister Ambrose,

We as doctors, professors and health advocates strongly urge you to authorize as quickly as possible the sale of electronic cigarettes with nicotine on the Canadian market. These devices, which basically heat a propylene glycol or glycerin solution containing nicotine, offer a far safer and more acceptable alternative for smokers to appease their addiction compared to regular cigarettes.

No doubt, tremendous strides have been made over the years to impose a strict regulatory framework on regular cigarettes. More obviously can be done. Unfortunately, it is wishful thinking that one day we will completely eradicate nicotine use. The vast majority of smokers want to quit. Unfortunately, only 10% of them, when surveyed, are still abstinent after trying to quit in the past year. Such data suggest that currently available nicotine replacement therapies do not offer much effective relief to addicted smokers.

In such a context, we strongly believe that the time has come for tobacco control to move beyond the usual approaches of education, total nicotine cessation and prevention. In a landmark report published in 2007, the Royal College of Physicians makes a compelling case why harm reduction should no longer be ignored by health authorities to lower the death and disease caused by tobacco use:

- “Current conventional preventive measures focus entirely on preventing uptake of smoking and helping smokers to quit smoking.
- This approach will be ineffective for the millions of smokers who, despite best efforts to persuade and help them to quit, will carry on smoking....
- Tobacco control policy needs to be radically extended to address the needs of these smokers with implementation of effective harm reduction strategies.
- Harm reduction in smoking can be achieved by providing smokers with safer sources of nicotine that are acceptable and effective cigarette substitutes.
- There is a moral and ethical duty to provide these products to addicted smokers.”

There is no doubt that electronic cigarettes are such a substitute. First, electronic cigarettes cannot even remotely be as toxic as regular cigarettes because there is simply no combustion of tobacco which produces the smoke containing for example the carbon monoxide and the bronchopulmonary irritants which are part of the 7000 chemical substances responsible for causing cardiovascular diseases, chronic obstructive lung diseases and at least 10 different cancers. Although opponents have voiced concerns that some toxic chemicals are detected in the vapor generated by electronic cigarettes, they fail to mention not only that their concentrations are just a minimal fraction of what is in tobacco smoke but also that similar levels of these chemicals are present in approved nicotine replacement therapies. As with other health interventions, this is not about the absence of risk or a standard of absolute safety, but one of maximum practical reduction in risks and the replacement of products with safer alternatives.

Second, sales data show that these products are widely accepted by smokers. In fact, there has never been a product that has generated so much enthusiasm on the part of consumers. Such interest is not surprising since electronic cigarettes deliver nicotine much quicker than existing nicotine replacement therapies, although they are still not quite as effective as regular cigarettes, and provide a similar behavioral experience as smoking, a contributing factor to cigarette addiction.

Opponents view the fact that electronic cigarettes are well accepted by consumers as a threat because they fear they will be a gateway to regular smoking. Such a claim has yet to be confirmed since current tobacco consumption trends are still dropping in countries such as France, the UK and the US where electronic cigarettes containing nicotine are sold legally. Initiation by teenagers is often raised as an issue as well, especially since a survey from the Centers for Disease Control in the US recently showed an increase in use amongst that specific age group. This information is misleading since 90% of these teenagers were already using cigarettes or other forms of tobacco products. This is not to say that there are no risks of unintended consequences, but as with other health policy interventions there is a strong preponderance of evidence in favour of the intervention. The death rates from continued smoking are simply too high to accept a continued nicotine-abstinence policy orientation.

Electronic cigarettes need to be appropriately regulated so that good manufacturing practices are followed to protect consumers and that sales to minors are forbidden. However, any excessive regulations which could make it too difficult to communicate about the reduced risks of these products or to access them should be avoided. It is our understanding that Health Canada considers that any non-tobacco product which contains nicotine falls under the purview of the Food and Drug Act. Furthermore, it has recently come to our attention that amendments to the Act in 2012 have given you broad authority to decide how this product could be more or less regulated. By making it possible to market electronic cigarettes with a broad range of nicotine levels to provide an effective

substitute for smokers, such a decision would no doubt save countless lives and millions of dollars in health expenditures. Smoking commercial cigarettes is not only an addiction, but must be regarded as a chronic disease and treated as such.

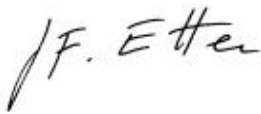
Sincerely,



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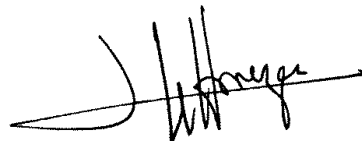
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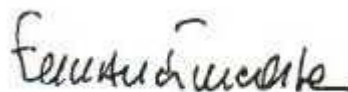
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