



April 22, 2024

VIA ELECTRONIC MAIL

The Honourable Mark Holland  
Minister of Health of Canada  
House of Commons  
Ottawa, Ontario K1A 0A6

Dear Minister Holland:

**Re: Recommendations for Government Regulation of Nicotine Pouches**

In July 2023, Health Canada gave approval to Imperial Tobacco Canada to sell Zonnica under the [Natural Health Product Regulations](#) as a Nicotine Replacement Therapy (NRT) product. Consequently, Zonnica is sold under the Health Canada approval without adhering to the restrictions of the Federal [Tobacco and Vaping Products Act, 1997](#) and the [Smoke-Free Ontario Act, 2017](#).

Since this time, nicotine pouches have become widely available to youth. These flavoured pouches can be legally purchased by those under 18 years of age in Ontario. The unrestricted sale, display, and promotion of nicotine pouches contribute to accessibility, normalization, and potential health hazards. Nicotine is highly addictive and its use, in any form, is unsafe for children<sup>1</sup> and youth<sup>2</sup>. Exposure to nicotine can have adverse effects on the developing brains of children and youth and increases the likelihood of initiation and long-term use of tobacco products<sup>2</sup>.

In March 2024, Public Health Sudbury & Districts released an advisory alert to local health system partners sharing concerns related to nicotine pouches. Additionally, letters were sent to education directors, educators, and parents to increase awareness of the availability and risks of nicotine pouches to children and youth.

At its meeting on April 18, 2024, the Board of Health for Public Health Sudbury & Districts took further action and carried the following resolution #26-24:

*WHEREAS Health Canada approved nicotine pouches for sale under*

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The Honourable Mark Holland  
April 22, 2024  
Page 2

*the Natural Health Product regulations providing no restrictions on advertising or sale to children and youth; and*

*WHEREAS the unrestricted sale, display, and promotion of nicotine pouches contribute to their accessibility, the normalization of nicotine use, and potential health hazards; and*

*WHEREAS nicotine is highly addictive and its use, in any form, is unsafe for children and youth; and*

*WHEREAS exposure to nicotine can have adverse effects on the developing brains of adolescents and young adults and increases the likelihood of initiation and long-term use of tobacco products; and*

*WHEREAS the emergence of nicotine pouch products occurred rapidly without requiring adherence to the restrictions of the federal [Tobacco and Vaping Products Act, 1997](#), and the [Smoke-Free Ontario Act, 2017](#); and*

*THEREFORE BE IT RESOLVED THAT the Board of Health for Public Health Sudbury & Districts strongly encourage Health Canada to take immediate action to close the regulatory gap that permits the sale of nicotine pouches to youth under 18 years of age; and*

*FURTHER THAT the Board of Health urge Health Canada to strengthen regulations to restrict the sale of new and emerging tobacco and nicotine products, ensuring that nicotine availability to children and youth never occur again; and*

*FURTHER THAT the Board of Health for Public Health Sudbury & Districts strongly encourage the Government of Ontario to exclusively sell nicotine pouches from behind pharmacy counters, limit their display in retail settings, and restrict their promotion, especially to youth; and*

*FURTHER THAT the Government of Ontario expand the Smoke-Free Ontario Strategy to create a comprehensive, coherent public health-oriented framework for the regulation of vaping and all nicotine-containing products.*

We applaud your pledge to take action to review the approval process for flavoured nicotine sales and advertising. We acknowledge the advisory Health Canada issued in March stating nicotine pouches should be used for nicotine replacement therapy in adults and the emphasis on keeping them out of reach of children and youth.

However, only until tighter restrictions of nicotine pouches are implemented, the widely available and accessible product will continue to expose children and youth to nicotine. The Board of Health for Public Health Sudbury & Districts strongly encourages the federal government to take immediate action to close the regulatory gap by restricting the sale of nicotine pouches to those under 18 years of age. We also support Health Canada in their assertion to halt the legal purchasing loophole and ensure that nicotine availability to children and youth never occurs with new and emerging products.

The Honourable Mark Holland  
April 22, 2024  
Page 3

We thank you for your attention to this important issue, and we continue to look forward to opportunities to work together to promote and protect the health of Canadians.

Sincerely,



René Lapierre  
Chair, Board of Health



M. Mustafa Hirji, MD, MPH, FRCPC  
Acting Medical Officer of Health and Chief Executive Officer

cc: Honourable Doug Ford, Premier of Ontario  
Honourable Sylvia Jones, Deputy Premier and Minister of Health  
Honourable Ya'ara Saks, Canada's Minister of Mental Health and Addictions and Associate Minister of Health  
Honourable Michael Parsa, Minister of Children, Community and Social Services  
Yasir Naqvi, Parliamentary Secretary to the Minister of Health, Honorable Mark Holland  
Dr. Kieran Moore, Chief Medical Officer of Health of Ontario  
France Gélinas, Member of Provincial Parliament, Nickel Belt  
Jamie West, Member of Provincial Parliament, Sudbury  
Michael Mantha, Member of Provincial Parliament, Algoma-Manitoulin  
Viviane Lapointe, Member of Parliament, Sudbury  
All Ontario Boards of Health  
Association of Local Public Health Agencies

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<sup>1</sup> U.S. Department of Health and Human Services. (2014). "The Health Consequences of Smoking-50 Years of Progress: A Report of the Surgeon General."

<https://www.ncbi.nlm.nih.gov/books/NBK294308/#ch5.s2>

<sup>2</sup> National Center for Chronic Disease Prevention and Health Promotion (US) Office on Smoking and Health. (2016). "E-cigarette Use Among Youth and Young Adults: A Report of the Surgeon General."

The Honourable Mark Holland  
April 22, 2024  
Page 4

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Retrieved on January 30, 2024 from  
[www.cdc.gov/tobacco/sgr/ecigarettes/pdfs/2016\\_sgr\\_entire\\_report\\_508.pdf](http://www.cdc.gov/tobacco/sgr/ecigarettes/pdfs/2016_sgr_entire_report_508.pdf).