



## STAFF REPORT ACTION REQUIRED

### Actions to Address Smokeless Tobacco Use in Toronto

<b>Date:</b>	September 12, 2016
<b>To:</b>	Board of Health
<b>From:</b>	Acting Medical Officer of Health
<b>Wards:</b>	All
<b>Reference Number:</b>	

#### **SUMMARY**

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Smokeless tobacco includes a variety of products, such as chewing tobacco or snuff, which are typically placed between the gum and the cheek, to be chewed or sucked, but may also be inhaled through the nose or dissolved in the mouth.<sup>1</sup> Even when the juices are spit out, the use of smokeless tobacco results in rapid absorption of nicotine into the bloodstream.<sup>2</sup> The use of smokeless tobacco products by young people is an issue of concern in Toronto. Toronto Public Health (TPH) has reviewed the health evidence on smokeless tobacco and has consulted with other jurisdictions and organizations that have already taken action on the issue. Toronto Public Health concludes that this issue requires action for four key reasons: 1) Smokeless tobacco is carcinogenic and is also associated with nicotine addiction and oral health problems; 2) The prevalence of smokeless tobacco use in Toronto is relatively low at present but is concentrated among youth – 3% of students in grades 7 to 12 report smokeless tobacco use in the last year<sup>3</sup>; 3) The visibility of smokeless tobacco use by professional athletes is of primary concern because of the number of youth who look up to them as role models; and 4) There is limited awareness and understanding of the health harms associated with smokeless tobacco use.

A Position Statement on Smokeless Tobacco prepared by TPH accompanies this report and includes additional detail on each of these areas of health concern. After considering the available information, TPH recommends that the Ontario Minister of Health and Long-Term Care amend legislation to prohibit the use of smokeless tobacco in all places that smoking is prohibited, including municipally and privately owned sports and recreation venues. In the absence of provincial action, other feasible options include a municipal by-law or a municipal policy that applies to users of City sports facilities. At minimum, amateur, semi-professional, and professional sports and recreation organizations and the venues that host them should be encouraged to develop, implement and enforce their own policies to restrict smokeless tobacco use.

## **RECOMMENDATIONS**

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### **The Acting Medical Officer of Health recommends that:**

1. The Board of Health endorse Toronto Public Health's Position Statement on Smokeless Tobacco (see Attachment 1);
2. The Board of Health urge the Ontario Minister of Health and Long-Term Care to enact legislation to prohibit the use of all smokeless tobacco products wherever smoking is prohibited, including at all Ontario sports fields and recreational facilities, and privately owned sports and recreation venues;
3. In the absence of provincial action by the summer of 2017 that the Board of Health direct the Acting Medical Officer of Health to report back on options for the City of Toronto;
4. The Board of Health forward this report to the owners of major sports and recreation venues in Toronto, including those that host professional leagues, with the request that they consider developing policies that prohibit all use of smokeless tobacco on the premises;
5. The Board of Health forward this report to amateur, semi-professional, and professional sports organizations in Toronto with the request that they consider developing policies that prohibit all use of smokeless tobacco;
6. The Board of Health forward this report to the Toronto District School Board, the Toronto Catholic District School Board, and Conseil scolaire Viamonde with the request that they consider developing policies that prohibit all use of smokeless tobacco where such policies do not exist; and
7. The Board of Health forward this report to the Ontario Minister of Health & Long-Term Care; the Chief Medical Officer of Health; Public Health Ontario; the Association of Local Public Health Agencies; the Ontario Public Health Association; the General Manager, Parks, Forestry and Recreation Division; the General Manager, Municipal Licensing & Standards Division; and Toronto's universities and colleges for information and action as appropriate.

### **Financial Impact**

There are no direct financial impacts arising from this report beyond what has already been approved in the current year's budget.

## **DECISION HISTORY**

At its meeting on March 21, 2016, the Board of Health requested the Medical Officer of Health, in consultation with the City Solicitor and community stakeholders, to report by the end of 2016 on possible municipal actions, including legislative approaches, to restrict chewing tobacco use in both professional and amateur sports facilities in Toronto. <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2016.HL10.4>

## **ISSUE BACKGROUND**

Smokeless tobacco products are used primarily in the context of amateur and professional sports. It is most popular among baseball players, but is also reportedly used in hockey, lacrosse, wrestling, soccer, rodeo, stock car racing, and sailing. Taking action on smokeless tobacco, particularly in the context of sport and recreation, would build on the smoke-free legacy of the TORONTO 2015 Pan/Para Pan American Games, which included smokeless tobacco.<sup>4</sup>

In early 2016, the Medical Officer of Health and the Chair of the Board of Health were made aware of a campaign in the U.S. to end the use of smokeless tobacco in Major League Baseball (MLB) and began to consider the options to address this issue in Toronto. Toronto Public Health (TPH) investigated the issue of smokeless tobacco in Toronto during the spring and summer of 2016. The process included a review of the health evidence, consultations with other jurisdictions that have introduced smokeless tobacco legislation, and consultations with local sports organizations that have smokeless tobacco policies. The Acting Medical Officer of Health used the information that was gathered to prepare the attached Position Statement outlining TPH's concerns related to smokeless tobacco, including the health risks, the unique context in which it is used, the regulatory environment in Canada, municipal actions in other jurisdictions, and existing policies of local sports organizations. This report summarizes the information presented in greater detail in the Position Statement.

## **COMMENTS**

### **Health Risks of Smokeless Tobacco Use**

In 2007, the International Agency for Research on Cancer concluded that smokeless tobacco is carcinogenic.<sup>5</sup> Smokeless tobacco products are highly addictive and significantly increase risk for oral cancers, pancreatic cancer, pre-cancerous lesions in the mouth, dental cavities, tooth decay, gum disease, and bacterial infections.<sup>6,7,8</sup>

It is concerning that smokeless tobacco products are often perceived as harmless, or as safe alternatives to cigarettes.<sup>9</sup> While smokeless tobacco use does not carry the same risk of lung cancer and vascular diseases as smoking, the risk of harmful health impacts is still significant. The impacts of secondary exposure also differ from smoking but should not be overlooked – although there is no second hand smoke, smokeless tobacco use can normalize and promote the use of tobacco products in the eyes of young people.

## **Trends in Youth Use of Smokeless Tobacco**

There are limited data available on the use of smokeless tobacco products in Ontario, but the evidence suggests that young people are most likely to try these products.<sup>10</sup> A 2015 study showed that up to 6.3% of Grade 7 to 12 students in Ontario and 3% of students in Toronto have used smokeless tobacco in the last year.<sup>3</sup> The number of young people who have tried smokeless tobacco products has remained unchanged since the introduction of the provincial *Tobacco Control Act* in 1994, whereas the number who smoke has decreased sharply.<sup>10</sup> Similar trends have been observed in other jurisdictions.<sup>10</sup> In spite of a stable trend in prevalence of use, there has been an 18.3% increase in the sale of smokeless tobacco products in Ontario since 2007.<sup>11</sup>

Young people who develop nicotine addiction by using smokeless tobacco may be more likely to try cigarette smoking or to use novel nicotine delivery systems like e-cigarettes.<sup>12</sup> Further, being able to use smokeless tobacco products inconspicuously may appeal to young people who want to avoid the stigma associated with smoking.<sup>13</sup> Some tobacco companies manufacture brands of smokeless tobacco that have lower nicotine levels and are designed for use by people who are not yet accustomed to the high levels of nicotine found in most smokeless tobacco products.<sup>14</sup> Flavoured and other novelty tobacco products are particularly attractive to young people.<sup>10</sup>

## **Smokeless Tobacco in Professional Sports**

Smokeless tobacco has been entrenched in the game of baseball for more than a century. Baseball organizations have reacted slowly to the issue and the deaths of several notable players from cancers related to smokeless tobacco use have been highly publicized. In 1993, the Commissioner of Baseball, who oversees Minor League Baseball (MiLB) and MLB, imposed a ban on smokeless tobacco on MiLB players. Unlike MLB players, MiLB players do not belong to a players' union. The Commissioner of Baseball has faced resistance to imposing a strict ban on major league players during collective bargaining.<sup>15</sup> In 2011, the MLB prohibited major league players from using smokeless tobacco during televised interviews and appearances, and any time that fans are present in the ballpark, unless it is concealed.<sup>16</sup> At least one other major professional sports league, the National Hockey League, prohibits the use of all forms of tobacco by players while in the presence of fans.<sup>17</sup> However, based on reports in the media and social media it is evident that some players continue to contravene the policy.<sup>18,19,20</sup> Penalties for MLB policy violators progress from written warnings to a maximum fine of \$5,000, but the fines appear to be an insufficient deterrent.<sup>16</sup> Various sources estimate that 25-37% of MLB players still use smokeless tobacco.<sup>20,21</sup>

The Campaign for Tobacco Free Kids has recently advocated for a ban on smokeless tobacco in Major League Baseball. Smokeless tobacco use by players and coaches with the Toronto Blue Jays is of particular concern because they are the only MLB team in Canada and have a vast audience of young, impressionable fans in Toronto and across the country. The public and visible use of smokeless tobacco products by professional athletes may normalize and glamorize the habit in the eyes of young fans.<sup>22</sup>

## **Smokeless Tobacco in Amateur Sports**

There are no data on the prevalence of smokeless tobacco use among athletes in Canada, but American jurisdictions report that more than 11% of high school athletes currently use smokeless tobacco, compared to 6% of their non-athlete peers.<sup>9</sup> Approximately half of all male hockey players, baseball players, and wrestlers at the level of the National Collegiate Athletic Association in the U.S. engage in smokeless tobacco use.<sup>23</sup> Smokeless tobacco is also reportedly popular in sailing, lacrosse, rodeo, and stock car racing. Some athletes report that they use smokeless tobacco to enhance their athletic performance, but there is no evidence that nicotine has any such effects.<sup>22,24,25</sup>

Several local and provincial amateur sports organizations have also implemented policies prohibiting the use of smokeless tobacco. These organizations include the Greater Toronto Hockey League, the Toronto Baseball Association, the Ontario Hockey Federation, Baseball Ontario, and the Ontario Soccer Association.<sup>26,27,28</sup> Their policies stipulate that any coach, player, fan or official using smokeless tobacco will be ejected from the game or event.<sup>26,27,28</sup> With the exception of Baseball Ontario, these leagues report that smokeless tobacco use is not currently a significant concern to the league and there are few violations to their smokeless tobacco policies. Baseball Ontario reports that smokeless tobacco continues to be problematic despite their policy. In contrast, the Toronto Baseball Association has indicated that implementation of a smokeless tobacco policy has effectively stopped smokeless tobacco use in their leagues.

In 2010, 16 local sport and recreation organizations were funded to develop tobacco-free policies, which included prohibitions on the use of smokeless tobacco. These organizations were re-engaged in the lead up to the TORONTO 2015 Pan American / Parapan American Games, which were tobacco-free games.<sup>29</sup> These policies set a clear example that the use of smokeless tobacco is not acceptable in the context of sports.

Voluntary approaches have both pros and cons. This approach has the benefit of placing the responsibility to enforce the policies on the organizations and venues and allows them to establish policies that are appropriate for their context.

Recommending voluntary policies could add additional pressure to ongoing MLB collective bargaining negotiations to strengthen the existing smokeless tobacco policy, but resistance from players may prevent this from happening. In the absence of a strong MLB policy, venue-specific policies at the Rogers Centre and other major facilities could further reduce the visibility of smokeless tobacco use by professional athletes in Toronto. Voluntary policies would not require any level of enforcement by the City. However, if organizations and venues choose not to establish and/or enforce policies, then this approach may be less effective than provincial or municipal legislation.

## **Smokeless Tobacco Legislation in Other Jurisdictions**

Several large U.S. cities introduced smokeless tobacco legislation in the first half of 2016, including Boston, Chicago, San Francisco, Los Angeles and New York City.<sup>30,31,32,33,34</sup> In addition, smokeless tobacco use will be prohibited during all professional baseball games or practices across the state of California as of December 1, 2016.<sup>35</sup>

The scope of the legislation and the enforcement strategies used in these jurisdictions vary. The laws apply to all sporting event sites, including municipally owned sites, in Boston, Los Angeles, San Francisco and Chicago. These regulations apply to professional, collegiate, high school, and amateur sporting events and apply to everyone at the event site, including players, coaches, officials, and spectators. The New York City legislation is however only applicable to ticketed sporting events.

In each of these jurisdictions, private event site owners/operators are required to post signage in specific places indicating that smokeless tobacco use is prohibited and are expected to enforce the policy at their venue. In the case of privately owned venues, owners/operators may penalize anyone who violates the legislation according to their own venue-specific policies. If owners/operators are not enforcing the legislation, local police authorities may issue tickets to individuals using smokeless tobacco products and/or venue owners/operators. On municipally owned property, local police authorities may ticket violators directly. In each of these jurisdictions enforcement is complaint-based. The penalties outlined in the legislation for these five jurisdictions range from \$250 for individuals to \$2,500 and revocation of any permits and licenses for individual or corporate venue owners/operators. There are very few reports of violations to these smokeless tobacco prohibitions and these jurisdictions have reported broad support for the legislation from members of the public, local sports organizations, and MLB players and management.

Within Canada, action to prohibit use of smokeless tobacco at local or provincial levels has been limited. The City of Steinbach in Manitoba has specifically prohibited smoking and chewing tobacco in and around its public buildings since 2010.<sup>36</sup> The 2013 smoke-free bylaw for the Town of Rosemère, Quebec, prohibits use of tobacco products (including smokeless tobacco) at municipal outdoor spaces such as parks and specific recreational facilities.<sup>37</sup> The Province of Alberta's ten-year tobacco reduction strategy released in 2012 includes smokeless tobacco in its goals related to prevention and protection of Albertans, recognizing the health risks from its use.<sup>38</sup> The strategy identifies initiatives to prevent youth and other vulnerable groups from using smokeless tobacco. It also notes commitments to consider ways to prohibit smokeless tobacco use on all government properties and, at a later stage, developing legislation and policy interventions to decrease smokeless tobacco use more broadly as part of the phased strategy.

### **Smokeless Tobacco Legislation in Ontario**

Sixteen Ontario municipalities have enacted tobacco-free bylaws at sports fields and recreational facilities that include prohibitions on smokeless tobacco use. Those bylaws apply only to municipally owned venues, but because there are no privately owned sports and recreation venues in those municipalities the comparisons that can be drawn to the Toronto context are limited. Some of the bylaws are limited to sports and recreation venues, playgrounds, and/or other parks (e.g., East Gwillimbury, Newmarket, and Innisfil) and others extend to all municipal property (e.g., Cobourg, Gravenhurst and Peterborough). Most of these municipalities do not explicitly prohibit smokeless tobacco,

but include this product in a broad definition of tobacco products that are prohibited under their smoke-free by-laws.

The City of Toronto enacted legislation in 2015 to prohibit smoking in the vicinity of various amenities in public parks and related facilities and similar legislation was later introduced into the *Smoke-Free Ontario Act*. These pieces of legislation limit the definition of 'smoking' to a 'lighted cigar or cigarette, pipe or any other lighted smoking material', which does not apply to smokeless tobacco.<sup>39</sup> The result is patchwork legislation across the province that leaves youth in Toronto and other municipalities incompletely protected from smokeless tobacco use.

### **Provincial Legislation Prohibiting the Use of Smokeless Tobacco Wherever Smoking is Prohibited**

Provincial legislation would serve to create a level playing field and protect the health of a larger population. It would also signal broader commitment to the issue. Extending legislation beyond sports and recreation venues would also protect youth from potential social exposure to forms of smokeless tobacco used in various ethnocultural communities outside of the sports context. Provincial legislation would be preferable to municipal legislation because many young athletes, including those from Toronto, travel across municipal boundaries to play and compete. The prevalence of smokeless tobacco use is greater in some other municipalities and provincial legislation would ensure that youth are more fully protected from social exposure to smokeless tobacco across the province.

### **Options to Limit Smokeless Tobacco Use in the City of Toronto**

In the absence of provincial action, there are two policy options that can be considered to address smokeless tobacco use in Toronto. Each of these options should be accompanied by education targeted to youth and athletes on the serious health harms associated with the use of smokeless tobacco.

#### **1) A municipal by-law prohibiting the use of smokeless tobacco at municipally and/or privately owned sports and recreation venues**

A municipal by-law prohibiting smokeless tobacco use at all Toronto sports and recreation venues would be consistent with the approach used in several U.S. cities. Enforcement would be difficult in any setting because it can be difficult to confirm what an individual has in their mouth without the authority to test the substance and would require additional City resources, but requiring privately owned venues to manage their own enforcement would reduce the requirement for City resources. Many local sports and recreation organizations already enforce their own smokeless tobacco policies and continuing to do so would contribute to by-law enforcement. If a municipal by-law is the preferred option, the scope of the bylaw, costs of implementation and approaches to enforcement would be important considerations.

**2) A municipal policy prohibiting the use of smokeless tobacco at municipally owned sports and recreation venues**

A policy approved by City Council that applies to municipally owned venues only would be easier to implement and enforce than a by-law that applies to all sports and recreation venues, including those that are privately owned. This option would protect youth from the health harms of smokeless tobacco use during amateur sports and recreation activities but would not address the issue of use by professional athletes and the associated social exposure that youth can experience when existing policies are not being enforced.

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**SIGNATURE**

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**ATTACHMENTS**

Attachment 1: Position Statement on Smokeless Tobacco



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