

# Clearing the Air: Protecting Youth from the Harms of Tobacco and Vaping

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**To:** Chair and Members of the Board of Health

**Meeting Date:** May 7, 2025

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**Medical Officer of Health & CEO**

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## Recommendations

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It is recommended that the Board of Health receive this report for information.

## Key Points

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- Wellington-Dufferin-Guelph Public Health's enforcement teams seized approximately \$9,000 in illegal tobacco and vape products—a sharp decrease from over \$45,000 in 2023, reflecting the success of ongoing enforcement efforts.
- Complaints and service requests related to tobacco and vape issues rose by 23% from 2023 to 2024, mainly concerning sales to minors and use in prohibited areas.
- Wellington-Dufferin-Guelph-Guelph Public Health plans to focus additional attention on tobacco and vape retailers situated within walking distance of secondary schools, as well as those with a documented history of non-compliance.
- Introduced in 2025, *Clear Choices: Understanding Tobacco, Vaping, and Cannabis* is an online educational program integrated into school boards' Learning Management Systems. This initiative promotes a progressive, education-based approach to enforcement with youth, which will also reduce referrals and optimize the use of limited enforcement resources.

## Background

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The Smoke-Free Ontario Act, 2017 (SFOA) is an essential piece of public health legislation designed to reduce exposure to harmful substances and prevent the initiation and use of tobacco, vapour products, and cannabis. It combines previous laws into a comprehensive framework that governs the sale, use, promotion, and display of these products. The Act prohibits smoking and vaping in enclosed workplaces, public spaces, and designated areas such as schools, hospital grounds, childcare centres, and recreational facilities.

Wellington-Dufferin-Guelph (WDG) Public Health is mandated to enforce the SFOA under the Ontario Public Health Standards (OPHS) to protect residents' health and promote tobacco-free living. This work is closely aligned with broader health promotion and cessation efforts aimed at reducing the burden of tobacco use in WDG communities.

Enforcement is carried out by Tobacco Enforcement Officers and Public Health Inspectors, who conduct inspections and compliance audits of tobacco and vape retailers, including convenience stores, tobacconists, and specialty vape shops. These inspections assess adherence to regulations around product display, age-of-sale restrictions, and required signage, with a strong focus on preventing youth access to restricted products.

Youth test shopping is a key enforcement strategy used to evaluate retailer compliance. In this program, trained underage individuals—under the supervision of enforcement officers—attempt to purchase tobacco or vapour products.

In addition to retail inspections, school properties remain a high priority for proactive enforcement and education. Tobacco Enforcement Officers conduct site visits in response to complaints and engage with school communities to raise awareness about the risks of tobacco and vaping. These efforts support healthier environments and reinforce the importance of prevention, protection and cessation.

## Discussion

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### Display and Promotion Audits

To enhance operational efficiency at WDG Public Health, all Public Health Inspectors were trained and certified in 2024 to support enforcement of the over 360 tobacco and vape vendors in the region. This strategic initiative enables a more integrated inspection approach.

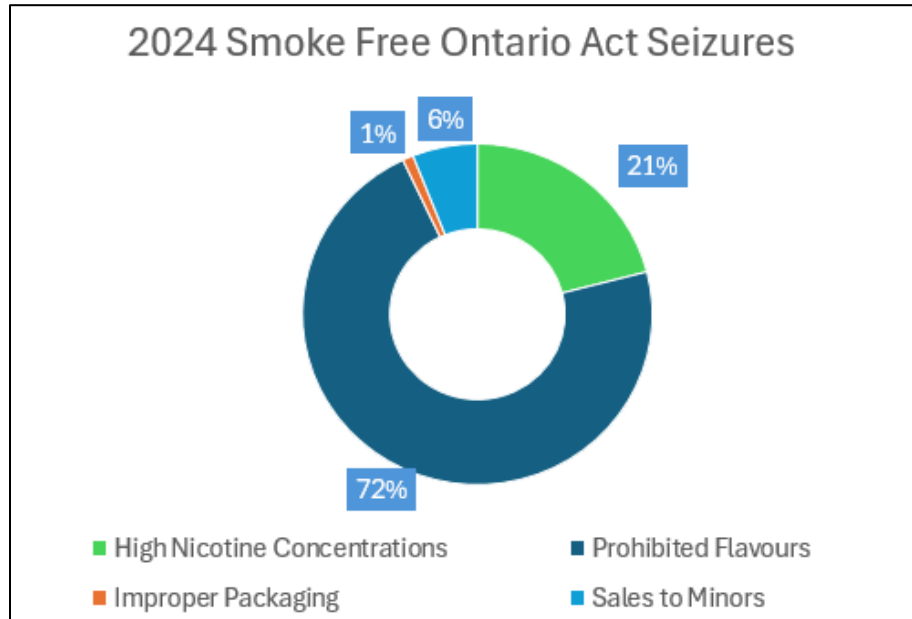
Public Health Inspectors now conduct Display and Promotion Audits alongside routine inspections under the *Health Protection and Promotion Act*, including those related to food safety and drinking water.

This formal integration has enabled more efficient use of staff resources, resulting in a measurable decrease in mileage and travel time for audits under the SFOA enforcement program. While Public Health Inspectors now spend more time onsite per visit to conduct multiple inspections under various regulations, the overall workload has been streamlined. This allows Tobacco Enforcement Officers to shift their focus toward higher-priority investigations and complaints for tobacco and vape enforcement.

The realignment of responsibilities is currently under evaluation to assess its effectiveness, but preliminary results suggest improved capacity and greater program flexibility. These enhancements strengthen WDG Public Health's readiness to respond to emerging enforcement demands and larger-scale public health needs, representing a positive return on investment through more strategic deployment of enforcement personnel.

### Illegal Product Seizures

In 2024, WDG Public Health enforcement teams seized illegal tobacco and vape products valued at approximately \$9,000. This marks a significant decrease from the over \$45,000 worth of products seized in 2023. The decline highlights the impact of ongoing enforcement and education efforts. It also reflects the success of regular onsite compliance inspections across tobacco and vape vendors in the region. The seized products typically include items with unapproved nicotine concentrations, non-compliant packaging, and prohibited flavours found in non-specialty vape stores (**Figure 1**).



**Figure 1** Percentage of various illegal products seized in 2024. Data retrieved from Environmental Health team, WDGPH

Removing these illegal products is a targeted effort to reduce their availability and appeal, particularly among youth and other vulnerable populations. By limiting access to these substances—often produced in unregulated facilities or imported illegally—enforcement teams play a critical role in protecting public health.

### Youth Test Shopping Audits

A growing trend observed both locally and across Ontario is the increasing prevalence of vape product sales, which have now surpassed traditional tobacco products. This shift underscores the ongoing need for tailored interventions and continued enforcement to address the evolving landscape of nicotine use among youth. In 2024, WDG Public Health continued its enforcement strategy, focusing on reducing youth access to tobacco and vape products. An essential part of this strategy involved youth test shopping initiatives, resulting in 49 tickets issued by Enforcement Officers.

In accordance with the mandates established under the OPHS, alongside display and promotion audits, all vendors dealing in vape and tobacco products undergo annual test shopping. Specifically, tobacco vendors are subject to two audits each year, whereas vape vendors are subject to one audit, resulting in approximately 550 audits, which are typically conducted during evenings and weekends (**Figure 2**). These enforcement activities have demonstrated effectiveness in identifying and rectifying instances of vendor non-compliance.

Youth Test Shopping Numbers	
146	Vape Vendors
366	Tobacco Vendor
34	Specialty Vape Stores
<b>546</b>	<b>Total Vendors</b>

**Figure 2** Number of Vape, Tobacco and Specialty Vape Vendors required test shopping within WDG. Tobacco vendors (183) require two audits per year and vape vendors (180) require one audit per year. Data retrieved from the Tobacco Information System, Ministry of Health

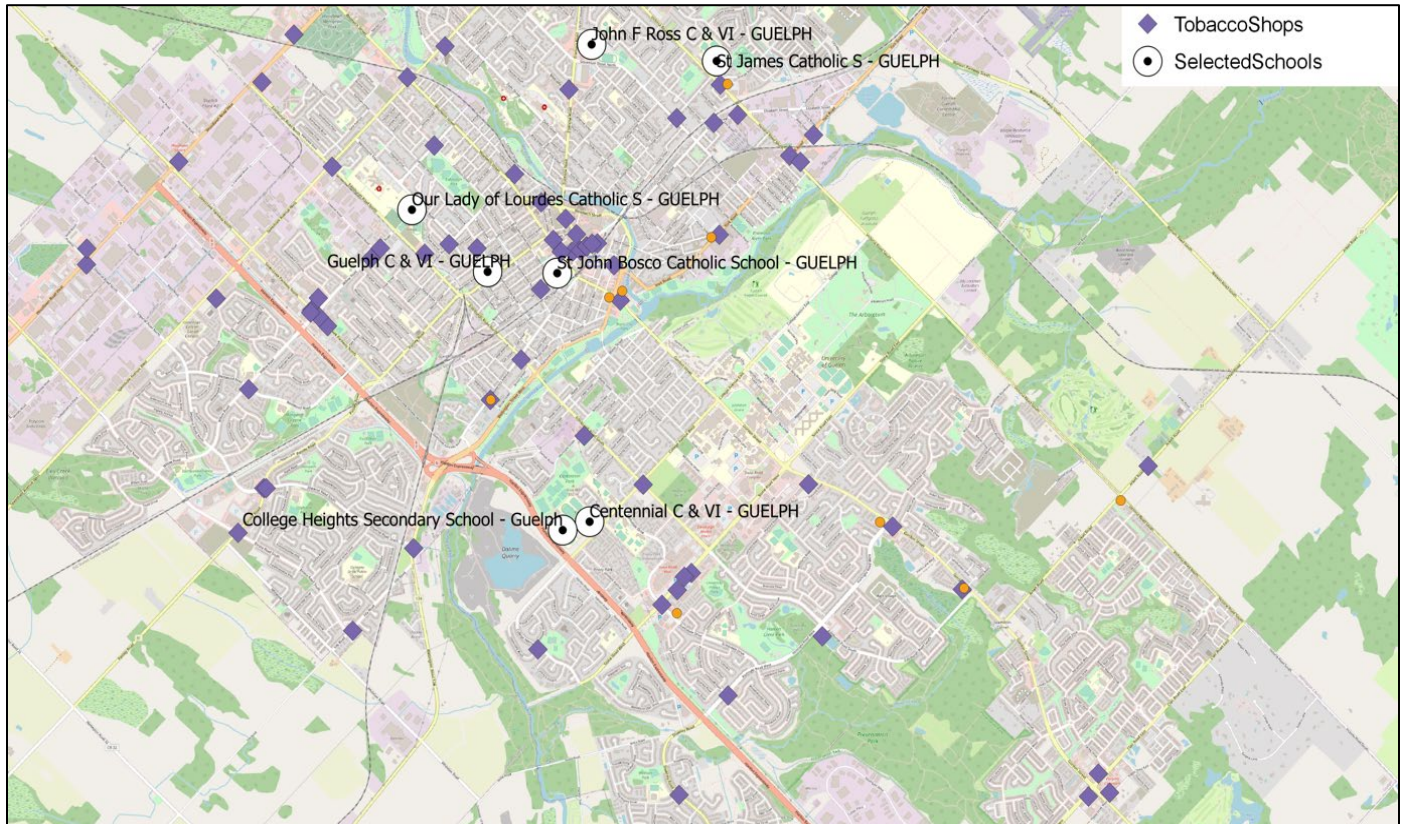
## Secondary School Inspections

WDG Public Health carries out comprehensive annual inspections of all secondary schools across the region. Education is provided to school administrators, and trends are shared with health unit health promotion teams for cessation initiatives.

Beyond regulatory enforcement, the annual inspections serve as a critical touchpoint for schools, allowing for the identification of emerging trends, concerns, and opportunities for education and support. These in-person inspections also enhance the visibility and accessibility of Public Health's tobacco prevention resources within school communities.

To further strengthen the impact of enforcement efforts, WDG Public Health applies a strategic lens by focusing additional attention on tobacco and vape retailers situated within walking distance of secondary schools, as well as those with a documented history of non-compliance. Once required routine inspections are completed, these higher risk locations may be subject to follow-up enforcement actions, including additional unannounced inspections and youth access test shopping (**Figure 3**).

This targeted and data-informed approach helps to reduce youth exposure and access to harmful products, reinforcing WDG Public Health's commitment to protecting children's health.

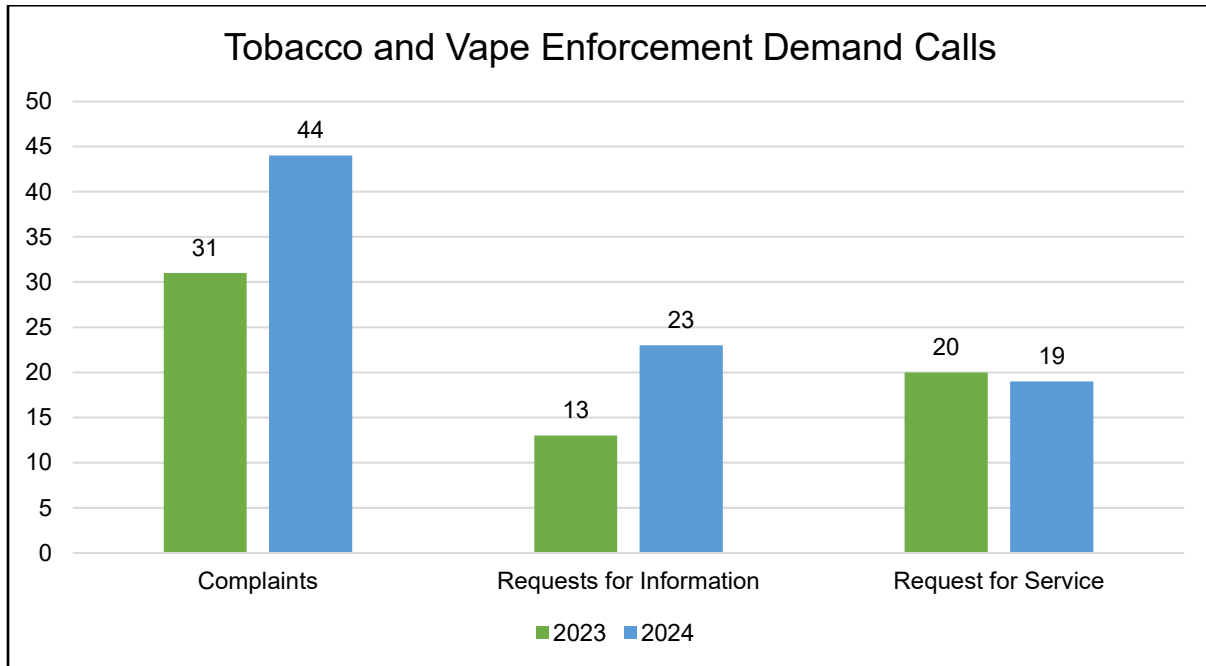


**Figure 3** Example of GIS mapping used to identify tobacco and vape vendors near the City of Guelph secondary schools.

## Complaints and Requests

There was a 23% (66 to 86) increase in demand calls, such as complaints and service requests, from 2023 to 2024 (Figure 4). Most of these were related to sales to minors or use in prohibited areas. This significant uptick signals a growing public awareness and concern about the health risks and regulatory violations associated with tobacco and vaping products.

The rise in complaints reflects the success of ongoing community education efforts and collaborative partnerships. Public health campaigns and improved school-based programming have all contributed to a more informed and engaged public, who are now more likely to recognize and report violations. To support this increased demand and ensure a timely response, WDG Public Health has made substantial improvements to complaint accessibility. In 2024, the online complaint submission form through the *Check Before You Choose* disclosure website made it significantly easier for residents, businesses, and community partners to report concerns to WDGPH enforcement teams. This tool is mobile-friendly, helping to eliminate barriers that previously may have discouraged reporting.



**Figure 4** WDG 2023-2024 Demand Calls for SFOA, Environmental Health Department.

Roughly 40% of complaints received by WDG Public Health—18 out of 44—were related to smoking or vaping incidents occurring within secondary school property across the region. These complaints most commonly result in issuing Notices of Violation for first-time offenders and, where applicable, tickets for repeated violations.

In many cases, a single complaint leads to the identification of multiple individuals, often detected by school administrative staff. Schools may also take disciplinary action, such as suspensions, in accordance with their internal policies.

A key factor contributing to the success of these enforcement efforts is the strong and ongoing collaboration between WDG Public Health Enforcement Officers and High School Resource Officers assigned by local police services. This partnership ensures a coordinated and consistent response to infractions, supports enforcement efforts, and reinforces the importance of maintaining smoke- and vape-free learning environments. The joint approach strengthens prevention efforts and enhances the overall effectiveness of youth tobacco and vape control in the region.

## Emerging Products

The nicotine product landscape is rapidly evolving, with manufacturers continuously introducing new products designed to bypass existing regulations.

- Flavoured nicotine pouches, approved by Health Canada in October 2023 as a natural health product for nicotine replacement therapy, were highly accessible in local stores with no restrictions on advertising or age. However, following sustained advocacy from WDG Public Health and other public health advocates nationwide, their sale was restricted in August 2024 to behind-the-counter access in pharmacies, with strict advertising limits to reduce youth appeal.
- Nicotine nasal inhalers surfaced in 2024, marketed as devices that could be used through both the mouth and nose—in an apparent attempt to evade existing legislation targeting mouth-inhaled vape products. The product was sold in various fruit flavours, with ads targeting youth. These were quickly reclassified as vape products by the Ministry of Health and subsequently removed from sale throughout the region by Tobacco Enforcement Officers and Public Health Inspectors during routine inspections.

## Next Steps

1. **Strengthen Youth Test Shopping:** WDG Public Health will continue prioritizing youth test shopping to monitor and enforce compliance among vape and tobacco vendors, reducing youth access to harmful nicotine products. Enforcement efforts will be increasingly data-driven, with added focus on vendors with prior violations and those located near secondary schools or youth-dense areas.
2. **Adapt to Emerging Trends:** While OPHS mandates require two annual audits for tobacco vendors and one for vape vendors, these standards no longer reflect current youth nicotine use patterns. WDG Public Health will continue meeting all provincial requirements while exploring targeted strategies—such as additional risk-based inspections, education, youth-informed hotspot mapping, and community reporting tools—to direct additional resources where they are most needed.
3. **Empower Through Education:** In response to rising concerns about student tobacco and vape use, WDG Public Health partnered with the Upper Grand and Wellington Catholic District School Boards to develop *Clear Choices: Understanding Tobacco, Vaping and Cannabis*. Launched in 2025, this online course offers an educational alternative for students caught using tobacco or vape products on school property.

While suspensions and fines remain in use, they may not address root causes and can create enforcement and financial challenges. *Clear Choices*, integrated into school board Learning Management Systems, provides a supportive, learning-focused response that promotes awareness of nicotine's health effects and related regulations to youth caught smoking or vaping on school property.

The course collects anonymous data on completion and school location to guide targeted resource allocation. It is also freely available on [WDG Public Health's e-learning platform](#), supporting educators, parents, and community members with accessible, evidence-based information. Education-focused tools like *Clear Choices* promote long-term health and informed decision-making.

### **Environmental Impacts: Disposable Vapes in Landfills**

Disposable vapes contribute to a growing environmental burden, presenting significant challenges in the fight against climate change. These single-use products generate substantial electronic waste, containing lithium-ion batteries, plastics, and electronic components that, when improperly discarded, can leach hazardous substances into soil and water systems. Recognizing the broader environmental and public health implications, WDG Public Health is committed to addressing these impacts through collaborative, sustainability-focused strategies under their climate change initiatives. Currently, few services exist for the public to properly recycle disposable vapes where the battery cannot be removed easily and safely, meaning that many vapes, and batteries are likely ending in landfills.

WDG Public Health is a member of the Tobacco Control Area Network, which is composed of regional promotion and enforcement leads across Ontario. This collaboration strengthens provincial and regional nicotine control efforts and allows pooled resources for health promotion. Through this network, WDG Public Health is exploring opportunities to work with provincial and federal partners to advocate for industry accountability, encouraging the development of reusable vape devices and manufacturer-led take-back programs. By aligning with broader environmental goals and fostering cross-sector collaboration, WDG Public Health aims to reduce the environmental footprint of vape products while supporting a healthier, more sustainable future.

## Health Equity Implications

WDG Public Health takes an equity-informed approach to addressing youth tobacco and vape use, recognizing that social and structural factors significantly influence health behaviours and outcomes. Youth from underserved communities may face greater exposure to tobacco and vape marketing, higher rates of stress, limited access to cessation supports, and fewer opportunities for health education—all of which contribute to higher rates of nicotine use and addiction. WDG Public Health initiatives, such as targeted enforcement and the *Clear Choices* educational program, aim to reduce these disparities by limiting access to nicotine products and providing youth with accurate, accessible information. Efforts are also focused on ensuring that schools and families have the tools to support prevention and early intervention, particularly in communities that have historically experienced health inequities. By using data to identify areas with greater need, WDG Public Health can allocate resources more effectively and work with partners to tailor support where they will have the most significant impact. This approach helps create more consistent and fair opportunities for all youth to achieve better health, regardless of background or circumstances.

## Conclusion

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Through data-driven enforcement, education, and collaboration, WDG Public Health continues to make measurable progress in reducing youth access to tobacco and vape products. The decline in illegal product seizures, along with increased enforcement activity through youth test shopping, demonstrates the effectiveness of these coordinated efforts.

Recognizing that nicotine use is shaped by broader social and structural factors beyond individual choice, WDG Public Health applies an equity-informed lens. This ensures that all youth—regardless of background or circumstance—can access the information, support, and opportunities needed to make healthier choices. Initiatives such as *Clear Choices* provide credible education for students while equipping schools and families with tools for timely intervention.

In response to a rapidly evolving nicotine landscape, WDG Public Health is adopting innovative strategies and reimagining traditional workflows to maximize impact with limited resources. These adaptive approaches are vital to sustaining momentum and ensuring long-term success.

# Ontario Public Health Standards

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## Foundational Standards

- ☐ Population Health Assessment
- ☐ Health Equity
- ☒ Effective Public Health Practice
- ☐ Emergency Management

## Program Standards

- ☐ Chronic Disease Prevention and Well-Being
- ☐ Food Safety
- ☐ Healthy Environments
- ☐ Healthy Growth and Development
- ☐ Immunization
- ☐ Infectious and Communicable Diseases Prevention and Control
- ☐ Safe Water
- ☐ School Health
- ☒ Substance Use and Injury Prevention

# 2024-2028 WDGPB Strategic Goals

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More details about these strategic goals can be found in [WDGPB's 2024-2028 Strategic Plan](#).

- ☒ Improve health outcomes
- ☒ Focus on children's health
- ☒ Build strong partnerships
- ☒ Innovate our programs and services
- ☐ Lead the way toward a sustainable Public Health system