



Health Canada

**Operational Guidelines
(2015 Edition)
Retailers' Behaviour
Towards Youth Access-to-Electronic Cigarettes
and Promotion at Retail**

Final Plan

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This document has been prepared by Ipsos and We Check for Health Canada. It describes operating procedures for evaluating retailers’ behaviour with respect to their willingness to sell to minors, as well as key aspects related to accessibility, placement and promotion of e-cigarettes at retail.

Some of these procedures have been adapted from guidelines originally established for the *Evaluation of Retailers’ Behaviour Towards Certain Youth Access-to-Tobacco Restrictions* by Health Canada.

These procedures have been developed on behalf of, and in consultation with Health Canada, who have approved the operational guidelines herein described.

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Operational Guidelines

E-cigarette Retailer Behaviour Measurements

1. Introduction

1.1 Purpose

This manual sets out operating procedures for evaluating retailers’ behaviour with respect to their willingness to sell electronic cigarette products (e-cigarettes) to youth, as well as key aspects related to accessibility, placement and promotion, including the promotion of any health claims, at retail outlets. It identifies and describes the fieldwork steps and tasks involved in the data collection process through to final reporting. Prior to sending survey teams to stores, a “Universe” study was conducted to identify the e-cigarette vendors in 20 regions across Canada, among nine classes of trade.

1.2 Background

Evidence has shown there is a growing consumer demand for e-cigarettes with more than 400 brands available on the global market today. In Canada, there is limited evidence of the availability of e-cigarettes and ease of access, particularly for youth, at retail locations across the country as well as limited evidence on the placement of these products and promotion within the retail environment, including the potential promotion of health claims.

Under the current legislative regime in Canada, e-cigarettes that contain nicotine and/or are marketed with a health claim (e.g., smoking cessation) are subject to the *Food and Drugs Act* and require authorization by Health Canada prior to sale based upon evidence of safety, quality and efficacy, as demonstrated by the manufacturer. At the time of this study, no e-cigarette product has been authorized under the *Food and Drugs Act*.

E-cigarettes that do not contain nicotine and do not have health claims are legally available without authorization by Health Canada and are subject to the *Canada Consumer Product Safety Act*. While these Acts address human health or safety concerns, they do not prevent marketing and sales of e-cigarettes to youth (with the exception of Nova Scotia where the *Tobacco Access Act* was amended and restrictions commenced May 31, 2015), or prohibit the addition of flavours which may appeal to youth.

According to the latest survey results from the 2013 Canadian Tobacco Alcohol and Drugs Survey (CTADS), 9% (N=2.5M) of Canadians aged 15 years and older said they have tried an e-cigarette. An estimated 20% (N=417K) of youth aged 15 to 19 and young adults aged 20 to 24 (N=488K) said they have tried an e-cigarette.

The CTADS results showed that among Canadians aged 15 years and older who have tried an e-cigarette, 2% (N=521K) used one in the past 30 days. Among youth aged 15 to 19, 3% (N=54K) said they used an e-cigarette in the past 30 days while 4% (N=95K) of young adults reported the same.

Among Canadians aged 15 years and older who had ever tried an e-cigarette, one-quarter (26%, N=650K) reported that the last e-cigarette they used contained nicotine.

Based on the 2013 CTADS results, current smoking prevalence among Canadians aged 15 years and older was 15% (N=4.2M) and 11% (N=225K) among youth aged 15 to 19 while 18% (N=435K) of young adults aged 20-24 reported the same. Concerns have been raised about how e-cigarettes may affect tobacco control gains, particularly among youth, by increasing the social acceptability of smoking-like behaviour and possibly initiating nicotine addiction via use of products that contain nicotine.

Concerns have also been raised about the accessibility of e-cigarette products and promotional elements including flavours and colours at retail.

1.3 Study Objectives

To gather baseline information in a rapidly changing retail marketplace where there have been calls to regulate youth access to e-cigarette products. The project will assess the willingness of retailers to sell e-cigarettes to youth and identify e-cigarette placement, accessibility and promotion elements, including the potential promotion of health claims at retail outlets.

Based on analyses of the “Universe” study, a sample of no fewer than 4,000 individual retail outlets across Canada will be visited to assess retailer willingness to sell e-cigarettes to youth.

This sample will be drawn from twenty (20) regions across Canada with representation in all ten (10) provinces.

Three or four major categories of stores will summarize results from nine (9) channels or classes of trade, which include nine (9) sub-categories of stores: chain, gas and independent convenience stores (GC); pharmacies (PH), grocery stores, mass merchandisers, discount stores (DGM); tobacconists, and dedicated “Vape” shops, including mall kiosks (SS). Retail channel or class of trade, in this context, refers to the types of stores that sell e-cigarette products.

Once the Sampling Plan and Operational Guidelines are approved by Health Canada, We Check will draw a random sample of retail outlets, from the refined database, to be included in the study.

Data collection will take place between July 2nd, 2015 and September 30th, 2015.

1.4 Specific Objectives

This project has two specific objectives:

1. to measure retailers' willingness to sell e-cigarettes and/or related products to youth;
2. to identify accessibility, placement and promotion elements associated with the sale of e-cigarette products at retail Point-of-Sale (POS).

1.5 Broad Goals

The information to be collected supports the broader objective in several ways:

- it sets a benchmark for future studies and provides independent measurements of retailer behaviour trends across Canada's regions and quantifies the degree to which e-cigarette retailers are willing to sell to youth, and retail accessibility, placement and promotion of the products;
- enables Health Canada to better understand the circumstances likely to contribute to retailers willingness to sell to youth and to use this information to design more effective legislation, education programs and awareness campaigns for the purpose of regulating e-cigarette sales and display in the future; and
- serves as a vehicle for generating increased public awareness of the willingness of retailers to furnish e-cigarette products to youth, the health issues surrounding e-cigarette substances, teen use and facilitates direct communication with young Canadians on this serious subject.

1.6 Key Measurements

This study will provide estimates of:

Sales To Youth

1. number and percent of retailers refusing to sell e-cigarettes to youth (survey participants will be between 15 and 17 years of age);
2. number and percent of retailers with: a visual self-service e-cigarette display; visual but inaccessible e-cigarette display (i.e. behind the counter); e-cigarettes out of sight behind a tobacco screen or hidden below the counter; and a self-service e-cigarette display not at the POS counter but elsewhere in the store; and
3. number and percent of e-cigarette retailers with promotion and advertising.

The data from this study is intended strictly for information purposes and is not being gathered for purposes of regulatory enforcement or a measure of compliance. As such, it is necessary to obtain only a general *estimate* of retailers’ willingness, to sell to youth.

Retailers’ willingness to sell will be based on the observation of certain overt actions, words and behaviour of the sales clerk just short of his/her ringing up the sale. (It is a prerequisite of this study that Teen Evaluators do not complete an e-cigarette or related product purchase).

2. Study Scope And Timing

2.1 Geography

E-cigarette retail checks will be made in a representative sample of retail establishments of different classes of trade located in 20 regions across the ten provinces of Canada.

- St. John's, NL
- Charlottetown-Summerside, PE
- Saint John, NB
- Moncton, NB
- Halifax, NS
- Greater Montreal Area (GMA), QC
- Quebec City, QC
- Ottawa, ON
- Kingston, ON
- Greater Toronto Area (GTA), ON
- Niagara-Hamilton Region, ON
- Kitchener-Waterloo-Guelph-Cambridge, ON
- Sudbury, ON
- Winnipeg, MB
- Regina, SK
- Saskatoon, SK
- Calgary, AB
- Edmonton, AB
- Greater Vancouver Area (GVA), BC
- Abbotsford-Chilliwack, BC

2.2 Classes of Retail Trade

Data collection will be made by sub-category from nine (9) classes of trade and reported on in three to four major categories (pharmacies may be grouped with discount and general merchandise), as follows:

- Gas/Convenience (GC)
 - chain convenience stores;
 - gas convenience stores; and
 - independent convenience stores
- Discount and General Merchandise (DGM)
 - discount stores;
 - grocery stores; and

- mass merchandisers
- Pharmacies (PH)
 - pharmacies within grocery stores; and
 - stand-alone pharmacies (e.g., Shoppers Drug Mart, Rexall)
- Specialty Shops (SS)
 - Tobacconists;
 - dedicated “Vape” shops; and
 - mall kiosks

2.3 Timing

All store visits will take place during the school summer recess period. Visits are scheduled to be executed from the beginning of July until the end of September 2015. However, we will endeavour to be completed with the fieldwork by Labour Day weekend.

The day of week and time of day of each visit will respect the normal hours of operations of each type of store, e.g. convenience stores open earlier and close later than malls and grocery stores. Specialty shops may not be open on Sundays, depending on the area of the city within which they are located.

3. Sample

3.1 Sample Size

A target of approximately 4,000+ individual retail establishments will be visited for this study.

3.2 Sample Regions Selection Process

The 20 regions in this study (itemized in Section 2.1 Geography) are comprised of the largest populated cities within each province, with a few exceptions. In the best interest of cost-effectiveness and accessibility for survey teams, twin-cities or regions that could be traveled to easily from a major metropolitan area were chosen so that the same survey teams could be used.

One important prerequisite of the city selection was to ensure representation of at least one city from each of Canada's ten provinces. Twin-cities were also selected when the sample size for a single city, representing a province, was too low, e.g. Summerside was added to the Charlottetown, Prince Edward Island (PEI) sample.

GTA, GVA and GMA, include some surrounding cities, not necessarily part of the official boundaries of the defined areas (e.g., Whitby and Oshawa are not officially part of the GTA but are included in the GTA study area and will be part of the region's results).

3.3 Universe Methodology

In view of the fact that no list of e-cigarette retailers is available for purchase, the approach to determine the number of e-cigarette retailers in each region used the following resources and methodologies:

- online research utilizing the internet - Google Maps, Google Web, Bing, and Yellow Pages;
- telephone calls to potential retailers; and
- in-store field checks.

Approach to Online Research

Each class of trade title was entered and other similar search words were used for each class of trade (e.g. grocery = food, pharmacy = drug store, vape = electronic cigarettes). To start the search for a city, the city name was entered into Google Maps, and then zoomed in on areas of

the city when an up-close view was needed. The Street View function was also used to see banner names and addresses, when required. The "Search Nearby" function was used for each class of trade at a time. For chain stores, their web sites were visited and their store locator tool was used to cross check or fill in for new locations. On this basis, 13,000 potential locations were identified.

Approach to Telephone Confirmation to Identify e-Cigarette Vendors

The purpose of this step was to call stores and ask them if they carried e-cigarette products in a haphazard manner so as not to sound like a research call. The callers dialed *67 before dialing the store phone number to block their number from call display.

If a call resulted in no answer, not in service, hang up, fax machine sound, or voice mail, or if a clear response was not provided, the caller would indicate in the spreadsheet that the location required a physical check.

Approach to In-Store Physical Checks to Confirm E-cigarette Vendors

Physical checks were performed on 3,150 of 6,220 locations; half of the resulting sample.

The purpose of this step was to visit stores and confirm relevant information such as, class of trade category, address, and whether or not they sold e-cigarette products. The field researcher also documented what type of e-cigarette was sold. If they were unable to see any e-cigarettes upon arriving at the store, they were instructed to ask the clerk if they carried them, in a natural manner, as though they were interested in buying one. This is because there is a good possibility that the e-cigarettes were either hidden in shelves or behind the counter. Discretion was emphasized. Field researchers were instructed to remain anonymous and act like a regular customer.

3.4 Retail Sample Methodology

The universe study identifies a total of 6,221 locations. We have established a target sample of n=4,050 (providing for 50 additional cases than the minimum n=4,000 to ensure we meet the targets). Based on this, the study will sample 65% of the total universe.

The sample plan provides for a distribution of cases that is proportionate to the universe by market and sales channel with a few adjustments that have been made to improve data quality and foster a robust analysis of the results. These adjustments are as follows:

- In any case where sampling 65% of the universe in a given market would result in fewer than 50 total cases, we have provided for a minimum of 50 cases. This will enable more reliable comparisons to be formed across markets in even smaller centers. For example, Charlottetown-Summerside in PEI has a total universe of 58 locations. This would ordinarily

provide for 38 cases (at 65%). To address this, we are targeting a minimum of 50 cases there.

- We propose to sample the entire universe of 210 vape stores identified.

Apart from considerations around market and sales channel, the sample will also control for the age and sex of the youth mystery shoppers. Approximately half the national sample will be visited by boys and half by girls. By age, about half the national sample will be visited by boys or girls seventeen years of age and the rest of the sample will be divided about equally between fifteen and sixteen years old. As much as possible, these distribution targets will be met within individual cities and across retail classes of trade. However, there are cities and store types where the number of sample stores is too small to accommodate a full mix of boys and girls across each age group. In these cases, the sample will be assigned to one or more teens of pre-determined age and sex. The distributions in all cities will closely reflect the criteria used during the 2014 study *Evaluation of Retailers’ Behaviour Towards Certain Youth Access-to-Tobacco Restrictions*.

After it has been collected, we propose to weight the data according to the population of the 20 markets studied, rather than to the population of sales channels. The reason for this is that the market is new and rapidly changing with the potential to vary significantly over time. Weighting to population provides an epidemiological, rather than market, orientation to the data that will allow for more stable and accurate tracking over time.

The sample size of $n=4,050$ will provide a 0.9 percentage point margin of error calculated at a 95% confidence interval.

3.5 Excluded from the Sample

Excluded from the universe of e-cigarette retailers are head shops or vape shops that present a risky environment for the teen, and bars, hotels or other establishments that are not typically classified as retail. In addition, this study focuses on “brick-and-mortar” e-cigarette retailers, therefore online e-cigarette retailers are excluded.

3.6 Random Sampling

The target sample of 4,050 will be chosen at random from the 6,221 locations in the universe. A RAND formula will be used in an Microsoft Excel® spreadsheet to select the locations at random by region and class of trade.

3.7 Procedure for Substituting Sample Stores

The procedure for substituting stores will be these, in descending order of priority:

1. within a given city, attempt to find a replacement store of the same class of trade as the original;
2. if no store of the same class is available for substitution, find a store from any of the remaining classes of trade within the major category, whichever is in closest proximity to the original;
3. if no substitute stores of any trade class are available within the major category, another store from another category may be chosen;
4. if no substitute stores of any trade class are available within the original city, the original store will be replaced with a store of the original trade class within another city in the same province; and
5. if no substitute stores of any trade class are available within the original city and province, the original store will be replaced with a store of the original trade class within another city outside the province, wherever availability of stores is greatest.

3.8 Statistical Weighting and Sample Distribution Tables

Final results will be weighted according to the population of the 20 markets studied. The reason for this is that the market is relatively new and rapidly changing with the potential to vary significantly over time.

Sample Distribution E-Cigarette Retailers (Summer 2015)

Region	Total Population	Proposed Sample	Specialty Stores			Gas/Convenience				Food/Mass Merchandise				Pharmacy
			Specialty Stores (NET)	Vape Store	Tobacco Store	Gas/Convenience (NET)	Chain Convenience	Ind't Convenience	Gas Convenience	Food/Mass Merchandise (NET)	Grocery	Discount Store	Mass Merchandise	Pharmacy (NET)
Newfoundland	110	72	3	3	-	55	19	13	24	11	11	-	-	3
St. John's	110	72	3	3	-	55	19	13	24	11	11	-	-	3
Prince Edward Island	58	50	3	1	2	42	4	11	27	3	3	-	-	2
Charlottetown-Summerside	58	50	3	1	2	42	4	11	27	3	3	-	-	2
New Brunswick	172	112	8	8	-	84	7	33	44	17	9	8	1	3
Moncton	87	57	5	5	-	43	5	13	25	7	6	1	1	2
Saint John	85	55	3	3	-	41	2	20	19	10	3	7	-	1
Nova Scotia	172	112	9	8	1	82	18	29	36	15	13	1	1	6
Halifax	172	112	9	8	1	82	18	29	36	15	13	1	1	6
Quebec	1428	930	71	48	23	826	214	428	184	28	22	5	1	4
Montreal	1216	792	44	28	16	717	184	379	155	26	20	5	1	4
Quebec City	212	138	27	20	7	109	30	49	30	2	2	-	-	-
Ontario	2254	1,440	88	65	23	1,196	314	491	391	76	39	22	15	81
Kingston	60	50	5	4	1	39	8	15	16	2	2	1	-	3
Kitchener-Waterloo, Guelph, Cambridge	84	55	3	2	1	40	16	5	19	7	4	1	2	4
Ottawa	221	144	10	7	3	112	42	24	46	12	6	6	-	10
Niagara/Hamilton	115	75	11	10	1	54	24	17	12	2	1	2	-	7
Sudbury	68	50	1	1	-	42	8	20	13	1	1	-	-	7
GTA	1706	1,067	57	41	16	908	216	409	284	51	25	13	13	51
Metro Toronto	860	516	26	20	6	456	105	244	108	17	11	4	2	16
Oakville-Mississauga-Milton	279	182	12	8	4	161	45	51	65	1	-	1	-	8
Brampton-Vaughan	209	136	5	2	3	93	24	39	30	22	13	6	3	16
Concord-Thornhill-Markham	110	72	4	3	1	63	12	26	26	1	1	1	-	3

Sample Distribution E-Cigarette Retailers (Summer 2015)														
Region	Total Population	Proposed Sample	Specialty Stores			Gas/Convenience				Food/Mass Merchandise				Pharmacy
			Specialty Stores (NET)	Vape Store	Tobacco Store	Gas/Convenience (NET)	Chain Convenience	Ind't Convenience	Gas Convenience	Food/Mass Merchandise (NET)	Grocery	Discount Store	Mass Merchandise	Pharmacy (NET)
Aurora-Newmarket-Richmond Hill	107	70	4	3	1	55	11	21	23	6	1	1	4	4
Ajax-Pickering-Whitby-Oshawa	141	92	6	5	1	79	19	29	32	4	-	-	4	3
Manitoba	196	128	12	9	3	103	39	6	59	12	4	2	6	1
Winnipeg	196	128	12	9	3	103	39	6	59	12	4	2	6	1
Saskatchewan	157	103	9	6	3	79	22	17	41	9	8	1	-	6
Regina	75	50	4	3	1	37	9	7	20	5	5	-	-	5
Saskatoon	82	53	4	3	1	43	13	10	20	4	4	1	-	2
Alberta	1108	721	53	25	28	500	157	149	194	116	88	23	5	53
Calgary	573	373	41	21	20	238	80	73	85	63	45	18	-	31
Edmonton	535	348	12	4	8	262	77	77	108	53	43	5	5	22
British Columbia	566	383	45	37	8	277	79	69	129	51	51	-	-	9
Abbotsford	55	50	8	5	3	31	6	1	23	5	5	-	-	6
Chilliwack	511	333	38	32	6	247	73	68	106	46	46	-	-	3
Total	6,221	4,050	299	210	89	3,245	872	1,245	1,128	338	250	61	27	168
Percentage of Total (by Class of Trade)			4%	2%	2%	78%	21%	30%	27%	12%	10%	2%	1%	4%

4. Methodology

4.1 Introduction

All aspects of the research design, including operational methods, field forms and any other documents for use in this study, were submitted to and approved by Health Canada. In all cases, these procedures are intended to:

- maintain the integrity of the data collection process;
- preserve the security of youth; and
- establish design controls that can easily be replicated and that will result in data being collected that will add to public understanding of issues involving retailer willingness to furnish e-cigarette products to youth.

4.2 General Approach

The essential aspect of this operation is to measure retailers’ willingness to sell electronic cigarettes to youth and the accessibility, placement and promotion of e-cigarettes and e-cigarette products within the marketplace under conditions permitting the retailer to respond in his/her natural manner.

An observation team made of one Adult Evaluator (over 19 years of age) and one Teen Evaluator (either 15, 16 or 17 years of age) will visit each selected retailer within their assigned area. It is critical to the success of this project that field personnel execute their duties discreetly. They are to pose as typical customers and do nothing to betray the true nature of their work.

Each team member has designated responsibilities.

4.3 Responsibilities of the National Field Coordinator

A National Field Coordinator will oversee the duties of the Regional Field Coordinators and monitor the general progress of the observation teams during the course of the study. The National Field Coordinator’s specific duties include the following:

- Assist with the Universe study by coordinating the efforts of all the Regional Field Coordinators while they conduct the online, telephone and fieldwork tasks to develop the list of e-cigarette retailers in each of the 20 cities or regions selected in Canada.
- Select a number of Field Researchers to assist with work tasks related to the development of the list of e-cigarette retailers.
- Recruit, screen, interview, hire and train the seven Regional Field Coordinators across the nation.
- Assist with the advertising, recruiting and screening processes to find Adult and Teen Evaluators for the e-cigarette study.
- Select a number of potential Adult and Teen Evaluators to interview and forward their information on to the Regional Field Coordinators.
- Prepare and distribute the Regional Field Coordinator information and training kits.
- Obtain and maintain confidential all documentation required by the Adult and Teen Evaluators, including the parental consent forms, and photocopies of the Teen Evaluator photo IDs.
- Maintain the database of locations in the online reporting system and make changes and corrections where necessary.
- Monitor all work activity and ensure that work schedules are being adhered to.
- Be fully aware of the scope of this project and ensure that it is communicated to and fully understood by the Regional Field Coordinators.
- Process all pays for the Regional Field Coordinators and Adult/Teen Evaluator teams. A schedule of three to four payment periods will be processed over the summer.
- Regularly communicate the status of the fieldwork to the Project Lead at We Check.
- Ensure that the Regional Field Coordinators are up to date with reviewing reports submitted by the Adult Evaluators in our online reporting system. Any errors, omissions and/or contradictions are to be addressed with the Regional Field Coordinators directly, as required, to complete the report validation.

4.4 Responsibilities of the Regional Field Coordinators

A Regional Field Coordinator will oversee the duties of the observation teams operating in the city in which he or she resides. The Regional Field Coordinator’s specific duties include the following:

- Assist with the Universe study doing online, telephone and fieldwork tasks to develop the list of e-cigarette retailers in their region.
- Select a number of Field Researchers to assist with work tasks related to the development of the list of e-cigarette retailers.
- Assist with the advertising, recruiting and screening process to find participants for the e-cigarette study.

- Select a number of potential Adult and Teen Evaluators to interview by contacting interested shoppers based on a list sent by email from the National Field Coordinator.
- Conduct in-person interviews and qualify potential Adult and Teen Evaluators.
- Hire qualified Adult and Teen Evaluators.
- Ensure that all Adult and Teen Recruitment forms are signed and delivered to the National Field Coordinator in Ottawa before fieldwork begins.
- Ensure that a digital image of every Teen Evaluator has been obtained and delivered to the National Field Coordinator in Ottawa before fieldwork begins.
- Be fully aware of the scope of this project and ensure that it is communicated to and fully understood by the Adult and Teen Evaluators in a training session.
- Maintain contact with Adult Evaluators to ensure a timely and thorough execution of the study's fieldwork by the Evaluators.
- Regularly communicate the status of the fieldwork to the National Field Coordinator.
- Validate all reports submitted by the Adult Evaluators in the online reporting system. Any errors, omissions and/or contradictions are to be addressed with the Adult Evaluators directly or with the National Field Coordinator, as required, to complete the report validation.

4.5 Responsibilities of the Adult Evaluators

- To ascertain that the consent form is signed by the parent or guardian of the Teen Evaluator.
- To have a valid driver's license and provide safe and adequate transportation for fieldwork team evaluation.
- Map out their route in a cost-effective and time-efficient manner.
- To ensure that the Adult and Teen Evaluator are not seen by the retailer together (e.g., park and drop off around the corner; out of sight of the retailer).
- GeoVerify their location position or discreetly take and upload a photograph of the retail outlet.
- Collect all required information regarding the accessibility, placement and promotion of e-cigarettes and related products and assist the teen with estimates of the clerk's age and other physical attributes required about the retailer.
- Familiarize him/herself with the online reporting questionnaire in "Sassie" to gain a broad understanding of all evaluation (i.e. willingness, accessibility, placement, promotion, and advertising) and data requirements.
- Ensure the data entry of a quality report in the online reporting system, Sassie, including the verification of the store type (class of trade).
- Train, supervise and oversee the security of Teen Evaluators working with them on this project.

4.6 Responsibilities of the Teen Evaluators

- Dress their age; not try to look older than they are by wearing make-up or growing facial hair.
- Familiarize him/herself with the online reporting questionnaire in “Sassie” to gain a broad understanding of all evaluation (i.e. willingness, accessibility, placement, promotion, and advertising) and data requirements.
- Gauge the willingness of each retailer to sell him/her an e-cigarette by actually attempting to purchase an e-cigarette from the retailer.
- Only ATTEMPT to purchase an e-cigarette from retailers; under NO CIRCUMSTANCES are they to complete the purchase.
- Teen Evaluators are required to carry less than \$5.00 in their pocket; to not carry a wallet or purse.
- If a Teen Evaluator reveals to a retailer they are not carrying enough money to complete a purchase, the Teen Evaluator is required to document in their evaluation whether the retailer suggested another cheaper e-cigarette product.

4.7 Controlling For Age and Sex Distribution

For the sale-to-youth evaluation component of this research, field controls have been established to ensure that sample store visits are completed by teens of pre-established age and sex.

The completion quota to be met in 2015 is as follows:

- Approximately half the national sample will be visited by boys and half by girls.
- By age, about half the national sample will be visited by boys or girls 17 years of age and the rest of the sample will be divided about equally between 15 and 16 year-olds.

Section 4.10 provides a breakdown of store visits by trade class in each city distributed according to Teen Evaluator age and sex targets.

4.8 Field Procedures for Adult Evaluators

Getting Started

- Adult Evaluators will have been trained and will have further familiarized themselves with the requirements of their part of the store checks. The sample will be sorted and assigned to teens according to the designated age and sex criteria established for each region.
- The location of each retailer should be verified on Google Maps, Batchgeo or another App, or paper map. One form for each retail establishment is provided in the online reporting system Sassie. The team may either print a paper copy as a draft form to complete in their vehicle or access the form online via wireless Internet or their smart phone data plan.

Assessing Retailer Environment

Upon arriving at the first establishment and *before* the Teen Evaluator goes into the store, Adult Evaluators will:

- if in a vape store or tobacconist store, assess the retail environment to ensure that the premises does not present a risk for the Teen Evaluator to enter. Risky environments will not be visited, such as locations allowing the use of the vaporizers in-store, a vape lounge, or a location selling drug paraphernalia;
- verify the approximate age of the retail clerk;
- scan the store discretely to verify if the e-cigarettes are accessible to the customers or must be accessed by the clerk, where they are placed and whether they can see any advertisements or promotional material;
- if in a grocery store that has a pharmacy, verify where the e-cigarettes are sold. If they are sold in the Nicotine Replacement Therapy (NRT) area of the pharmacy, the adult will ensure that the class of trade is listed as pharmacy (PH), if they are sold at the courtesy counter of the grocery store or in a separate unit attached to the grocery store, the adult will ensure that the class of trade is listed as grocery (DGM); and
- exit the store discretely and verbally report the shop environment to the Teen Evaluator.

Recording Results

Once out of sight of the retailer, the adult evaluator will:

- GeoVerify their location position or take a picture of the retail outlet;
- complete their section of the report re: accessibility, placement and promotion, and assist the Teen Evaluator in completing his/her written record or online report of their observations; and

- before moving to the next location, Adult Evaluators will conduct a visible inspection of a one block area around the perimeter of the store to search for the presence of a school or mall (enclosed mall) in close proximity (within 300 meters) of the establishment after which they will record what they find.

4.9 Field Procedures for Teen Evaluators

Getting Started

- Teen Evaluators will appear their actual age and will make no attempt to look older by way of make-up, demeanor or dress.
- They will familiarize themselves with their duties and review the particular details of the operation with their Adult Evaluator prior to commencing fieldwork.
- They will carry no identification anywhere on their person.
- They will carry no more than \$5.00 on their person, ensuring they do not have enough money to complete an e-cigarette purchase.
- They will conduct some online research about electronic cigarettes so that they are familiar with the devices and products with reference to the list of resources as per section 6.5.

Checking Retailer Behaviour Re: Sales to Youth

- The Teen Evaluators will be driven by the Adult Evaluators to the retail establishments on the list provided by We Check.
- The Teen Evaluator will enter the store alone and search for the e-cigarettes where the Adult Evaluator informed him/her they were displayed, or go up to the cashier if they are stored behind the counter. He/she will proceed to take one off the shelf (if self-service) or proceed to ask for “a disposable e-cigarette” from the clerk. If the clerk states that they do not carry disposable e-cigarettes, the teen will ask for the cheapest starter kit the store carries. During the attempted transaction:
 - Teen Evaluators will make no misleading statements **other than if asked their age**; if asked their age, they will claim to be 19 years of age;
 - if the retailer appears willing to sell him/her the e-cigarette, they will verify their money and indicate that they obviously don't have enough to buy the e-cigarette, or forgot their wallet, and casually leave the premises;
 - if the retailer offers to sell them a cheaper solution, the teen will politely decline and leave; and/or
 - if the retailer refuses to sell them the e-cigarette or kit, the teen will politely thank the clerk and leave.

The above procedures are the same for all classes of trade with the exception of vape stores. These stores are designed expressly for the sale of e-cigarettes and may require more of an interactive dialogue with the teen concerning their preferences for e-cigarette use or e-liquids.

Recording Results

Immediately upon exiting the store, and in a far enough location to be discreet (i.e., not within visual sight of the retail clerk), the Teen Evaluator will meet up again with his/her assigned Adult Evaluator and create a record of the experience on pre-printed forms or with their mobile device.

The minor will record:

- answers to specific questions about the retailers words and actions designed to indicate willingness to sell;
- ancillary facts including:
 - day of visit;
 - time of visit;
 - age and sex of teen evaluator;
 - sex of clerk who served him/her;
 - perceived general age of clerk;
 - whether or not any other adult customers were in the store at the same time of the attempted purchase;
 - whether the retailer suggested another purchase solution for e-cigarettes or other products; and
 - other elements from Sassie.

The above observations will be used for cross-tabulating sales-to-youth results.

Once all required information has been properly and completely recorded, the observation team will drive to the next indicated location and repeat the routine.

Note Regarding Role of Field Evaluators: The responsibility of team evaluators is strictly administrative. The final determination on whether or not a retailer demonstrates willingness to sell will be made by the research firm, based strictly on an objective interpretation of the recorded observations.

4.10 Teen Quota Targets Table

Regions	Teen Quota Targets - 2015						TOTALS
	Male			Female			
	15	16	17	15	16	17	
ST. JOHNS			37	37			73
CHARLOTTETOWN-SUMMERSIDE	25				25		50
MONCTON						58	58
SAINT JOHN		55					55
HALIFAX			57		57		113
MONTREAL	99	99	198	99	99	198	792
QUEBEC CITY	69					69	138
KINGSTON			25	25			50
KITCHENER-WATERLOO-GUELPH-CAMBRIDGE		27				27	54
OTTAWA	36			36		72	144
NIAGARA-HAMILTON			37		37		74
SUDBURY			25	25			50
GTA	101	167	267	146	65	325	1069
Metro-Toronto	65	65	129	65	65	129	516
Concord-Thornhill-Markham	37					37	73
Ajax-Pickering-Whitby-Oshawa			47	47			93
Oakville-Mississauga-Milton			91			91	182
Brampton-Vaughan		68				68	136
Aurora-New market-Richmond Hill		35		35			69
WINNIPEG			65		65		129
REGINA			25		25		50
SASKATOON		27				27	54
CALGARY	93		93		93	93	373
EDMONTON		87	87	87		87	349
ABBOTTSFORD-CHILLIWACK		25		25			49
VANCOUVER	42	42	84	42	42	84	334
	465	529	998	521	507	1,040	4,058
	1992			2067			
	50%		50%	50%		50%	Ratio

Note: Sub-totals and Totals may be ±1 due to rounding.

5. Staffing Process

5.1 Adult Evaluators

Adult Evaluators will be selected based on applications from We Check's network of independent researchers.

We Check’s researchers have a great deal of experience collecting data at retail establishments. Many of them have experience in conducting compliance checks for clients of We Check.

Only adults above the age of 19 will be contacted, typically looking for someone in their mid-thirties and above, as they are more likely to have children within the required age range who could be considered as candidates for the Teen Evaluator positions.

5.2 Teen Evaluators

Only teens that look their age will be hired to perform the store visits. Teenagers, who are youth between the ages of 15 and 17 years old, will be hired as Teen Evaluators to gather e-cigarette retailer information and attempt to purchase an e-cigarette to verify if the retailer is willing to sell to them and if they are asked for identification.

The Teen Evaluators will be hired on the basis of pre-established age and sex requirements. The requirements are based on age/sex distributions across cities and classes of trade. The process for establishing the distributions followed these general guidelines:

- in Canada’s three largest regions (Toronto, Montreal and Vancouver) at least six teens representing both sexes and all three age groups by sex will be hired;
- in all regions with a total sample size of between 200 and 400 stores, a minimum of four Teen Evaluators will be hired. Hiring criteria required that at least two male and two female be hired and that, regardless of sex, there be at least two youth 15 or 16, and two 17 year-olds;
- in all regions with a total sample size of between 50 and 200 stores, a minimum of two Teen Evaluators will be hired. Hiring criteria required that at least one male and one female be hired and that, regardless of sex, there be at least one minor 15 or 16, and the other 17 years old; and
- a mix of both male and female Teen Evaluators be hired so that, nationally, the sexes are represented in roughly equal proportions.

5.3 Recruiting Procedures

All the Regional Field Coordinators will be hired for the summer from We Check’s network of independent contractors or university students. The Regional Field Coordinators will be chosen for their previous reliability and track record of performance with We Check. They have will also have been chosen for their past experience in working with youth, either as teachers or youth groups.

Applicants are screened for conflict of interest to ensure that they do not work for or have any association with e-cigarette retailers or the industry in general.

The search for observation teams will begin by contacting all adult members of We Check’s network of researchers in the thirty cities. The researchers will be briefed on the nature of the

assignment, including the fact that a Teen Evaluator is required. Interested researchers will apply for the assignment, indicating if they know a teen who is interested in being on their observation team.

The Regional Field Coordinators will conduct an in-person meeting with all observation team applicants at a neutral location (e.g., hotel conference room, library study room, etc.). The Regional Field Coordinator will ask the adult and teen why they are interested in being part of this project to gauge professionalism and motivation. If both adult and teen meet the requirements, the Regional Field Coordinator will take a photocopy of the teens ID to keep a record on file and verify the teens age.

Teens who are interested in participating must meet age, sex, language and other requirements critical to the proper execution of the study. Each teen will be required to fill out a qualification questionnaire.

All potential teen hires must obtain the signed permission of their parents or legal guardian before being hired. A form has been created for this purpose describing for parents the work their children are expected to perform as a Teen Evaluator. (A copy of the consent form, with qualification questionnaire appears at the end of this section.)

The work engagement of these teens is strictly temporary, lasting only as long as it takes to complete the research.

5.4 Security of Teen Evaluators

There are currently no laws in place that deem it an offense for a youth to attempt to buy e-cigarettes or be on the premises for the purpose of retailer checks. The Teen Evaluators used in this surveillance project are therefore not breaking any laws. Age-restriction signs for access to premises or for selling e-cigarettes or tobacco products may be posted; however the violation of the law or policy falls on the retailer, not the teen.

Nonetheless, it is a requisite of this project that under-age Teen Evaluators UNDER NO CIRCUMSTANCES complete a purchase.

Throughout the period they are engaged in work for We Check, Teen Evaluators will be accompanied by an Adult Evaluator as part of the observation team. The responsibility of the adult towards his charge includes:

- overseeing the safety of the teenager to and from retail locations;
- supervising and providing guidance related to the execution of the teen’s duties; and
- ensuring that observations are properly recorded.

Adult Evaluators will be advised of their responsibility towards the Teen Evaluators in writing.

Teen Evaluators are expected to adhere to the behaviour guidelines outlined by their supervisors including the Adult Evaluators, Regional Field Coordinators, and National Field Coordinator.

For the security and well-being of all, in-person interviews will take place only in public places (e.g., hotel conference room, library study room, etc.) and only when the Adult and Teen are present together.

5.5 Teen Hiring Targets Table

The following are the targets for the number of teens (and teams) per region, age and sex:

Teen Hiring Targets - 2015									
Regions	Male			Female			Both		
	15	16	17	15	16	17	15	16	17
ST. JOHN'S	0	0	1	1	0	0	1	0	1
CHARLOTTETOWN-SUMMERSIDE	1	0	0	0	1	0	1	1	0
MONCTON	0	0	0	0	0	1	0	0	1
SAINT JOHN	0	1	0	0	0	0	0	1	0
HALIFAX	0	0	1	0	1	0	0	1	1
MONTREAL	1	1	1	1	1	1	2	2	2
QUEBEC CITY	1	0	0	0	0	1	1	0	1
KINGSTON	0	0	1	1	0	0	1	0	1
KITCHENER-WATERLOO-GUELPH-CAMBRIDGE	0	1	0	0	0	1	0	1	1
OTTAWA	1	0	0	1	0	1	2	0	1
NIAGARA-HAMILTON	0	0	1	0	1	0	0	1	1
SUDBURY	0	0	1	1	0	0	1	0	1
GTA	2	3	3	3	1	4	5	4	7
Metro-Toronto	1	1	1	1	1	1	2	2	2
Concord-Thornhill-Markham	1	0	0	0	0	1	1	0	1
Ajax-Pickering-Whitby-Oshawa	0	0	1	1	0	0	1	0	1
Oakville-Mississauga-Milton	0	0	1	0	0	1	0	0	2
Brampton-Vaughan	0	1	0	0	0	1	0	1	1
Aurora-New market-Richmond Hill	0	1	0	1	0	0	1	1	0
WINNIPEG	0	0	1	0	1	0	0	1	1
REGINA	0	0	1	0	1	0	0	1	1
SASKATOON	0	1	0	0	0	1	0	1	1
CALGARY	1	0	1	0	1	1	1	1	2
EDMONTON	0	1	1	1	0	1	1	1	2
ABBOTTSFORD-CHILLIWACK	0	1	0	1	0	0	1	1	0
VANCOUVER	1	1	1	1	1	1	2	2	2
	8	10	14	11	9	13	19	19	27
	19 (15-16 yrs)	14 (17 yrs)	20 (15-16 yrs)	13 (17 yrs)	65				

Note: Sub-totals and Totals may be ± 1 due to rounding.

6. Training

6.1 Information Kit

All members of the field force will receive an information kit containing:

- the provincial legislations, as they stand today, appropriate to their region;
- a detailed set of instructions for Adult Evaluators covering responsibilities and tasks related to observations for store checks;
- instructions to cover the adults' responsibilities towards the security of the Teen Evaluator and responsibility for ensuring that the work of the teen and their own is properly gathered, recorded and returned;
- separate set of procedures for Teen Evaluators addressing how to initially approach a retailer in the various types of stores to pick up or to ask for an e-cigarette or starter kit, and then how to retreat casually without completing the purchase; and
- instructions on plotting their locations with Batchgeo or Google maps and mapping out their route, as well as the list of locations each Adult/Teen Evaluator team will visit.

The guidelines and instructions were developed based on previous field experience with research of this type and new information gathered about e-cigarettes and related products.

6.2 Regional Field Coordinator Instructions and Overview Form

Regional Field Coordinator Instructions and Overview

The Regional Field Coordinator (RFC) will:

- Assist with the Universe study doing online, telephone and fieldwork tasks to develop the list of e-cigarette retailers in their region.
- Select a number of Field Researchers to assist with work tasks related to the development of the list of e-cigarette retailers.
- Assist with the advertising, recruiting and screening process to find participants for the e-cigarette study.
- Select a number of potential Adult and Teen Evaluators to interview by contacting interested shoppers based on a list sent by email from the National Field Coordinator.
- Conduct in-person interviews and qualify potential Adult and Teen Evaluators.
- Hire qualified Adult and Teen Evaluators.
- Ensure that all Adult and Teen Recruitment forms are signed and delivered to the National Field Coordinator in Ottawa before fieldwork begins.

- Ensure that a digital image of every Teen Evaluator has been obtained and delivered to the National Field Coordinator in Ottawa before fieldwork begins.
- Be fully aware of the scope of this project and ensure that it is communicated to and fully understood by the Adult and Teen Evaluators in a training session.
- Maintain contact with Adult Evaluators to ensure a timely and thorough execution of the study's fieldwork by the Evaluators.
- Regularly communicate the status of the fieldwork to the National Field Coordinator.
- Validate all reports submitted by the Adult Evaluators in the online reporting system. Any errors, omissions and/or contradictions are to be addressed with the Adult Evaluators directly or with the National Field Coordinator, as required, to complete the report validation.

The RFC will familiarize him/herself with their scope of the project which has been organized below into the following parts:

The Adult Observations and Teen Attempted Purchase

This pertains to retailer behaviour surrounding the accessibility, placement and promotion of e-cigarettes and the willingness of retailers to sell to youth.

For this aspect, the RFC must communicate to the Adult Evaluator that they must not be present in the store when the Teen Evaluator attempts to purchase the e-cigarettes. RFC must, however, validate all reports submitted by the Adult Evaluators to ensure accuracy of all the information as required in the online reporting system Sassie.

Age And Sex Quotas

This study specifies that store visits for the purpose of attempting to purchase e-cigarettes must be completed by Teen Evaluators of a specified age AND sex. Strict observance of the age and sex requirement is imperative. UNDER NO CIRCUMSTANCES can one substitute Teen Evaluators of one designated age and sex with a Teen Evaluator of a different age or sex. In addition, one cannot substitute a visit by a designated Teen Evaluator to one type of store with a visit to a store of another type. For example, If the requirement is that grocery store "X" be visited by a 16 year old boy, that store must be visited by that person. It is not acceptable to visit the store either with a boy who is not 16 or with a 16 year-old girl. Neither is it acceptable to use a 16 year-old boy to visit a store that is not a grocery store, if that is not what the instructions entail.

If the Adult Evaluator encounters problems completing the store quota as designated for their city, the RFC must advise the National Field Coordinator within 24 hours. New instructions will then follow.

Supervision of Teen

The RFC will communicate to the Adult Evaluator that he/she is responsible for the working ethics, general appearance, actions and safe transportation of the Teen Evaluator once this project begins.

At the beginning of this project, the Adult Evaluator must establish a time and place to meet the Teen Evaluator for commencement of the day's work. If the team is required to work into the evenings, transportation to the Teen Evaluators home must be arranged.

Within the scope of this study, it is essential that the Teen Evaluator does not actually purchase an e-cigarette, but only attempts to purchase in order to complete the research.

When the evaluation team meets to begin the day's work, the Adult Evaluator must make sure the Teen Evaluator looks their age and has done nothing to disguise their normal appearance, (i.e., doesn't look older than 15/16/17 years of age). The Teen Evaluators appearance should not have been altered with excessive jewelry or makeup, revealing clothing, or any other type of self-expression that may make the Teen appear older than they are. If the Adult Evaluator determines the Teen Evaluator appears older than they are because of any of these modifications, the Teen Evaluator will have to remove the jewelry and/or makeup/change into more appropriate clothing, etc., before the fieldwork begins.

The Adult Evaluator will be responsible for entering the store and:

- collecting all required information regarding the accessibility, placement and promotion or electronic cigarettes and related products;
- estimating the age of the clerk;
- GeoVerify their location position or take a picture of the retail outlet; and
- confirm the Class of Trade of the location (Gas Convenience, Independent Convenience, Chain Convenience, Grocery with tobacco sold inside at the courtesy counter or sold outside in a separate unit, etc.).

Proximity of Schools/Malls

The Adult Evaluator is required to indicate whether or not the store is located in close 'proximity' to a School or Shopping Mall/Plaza.

Proximity means within a 300 metre perimeter of the store. Therefore, at the completion of each store visit, it may be necessary for the evaluator to drive around the perimeter of the store to determine whether or not there is a School or Mall (enclosed mall) close by. The only time this will not be necessary is when either a School or a Shopping Mall/Plaza is in clear view.

Sample Replacement

In some cases, it may become necessary for the Adult Evaluator to replace a sample store. This may happen if the store on their list is closed, does no longer fit the store description (i.e., has changed from a Grocery store to some other store type), or does not sell e-cigarettes.

It is **VERY IMPORTANT** to this study that every attempt is made to replace the sample store with another store of the same type (class of trade).

If an attempt is made at finding a replacement and a similar type store cannot be found, this fact must be reported immediately to the National Field Coordinator. Instructions will then follow on finding a replacement store.

6.3 Adult Evaluator Instructions and Overview Form

Adult Evaluator Instructions and Overview

The Adult Evaluator will:

- Become familiar with the scope of this project (below).
- Ensure that both the Adult and Teen Recruitment Forms with parental signature are signed and delivered to the Regional Field Coordinator *before* the fieldwork begins.
- Maintain contact with the Regional Field Coordinator on a regular basis.
- Ensure the timely and accurate execution of all required store visits.
- Establish a time and place to meet the Teen Evaluator for commencement of the day's work.
- Familiarize him/herself with the online survey questionnaire (both Adult and Teen portions) in order to better understand the accessibility, placement, and promotion elements under evaluation.
- Ensure that all reports (both the adult and teen portions) are submitted in the online reporting system.
- Use Google maps or equivalent to map out the route in a cost-effective and time-efficient manner.
- The Adult Evaluator will be responsible for entering the store and looking for the following:
 - whether e-cigarettes are visible and whether they are accessible by the customer;
 - tell the teen where the e-cigarettes were so that he/she can go directly there upon their turn to enter or instruct the teen that none were visible;
 - in the case of Vape Shops, ask whether disposable e-cigarettes are available for sale, if so, where they are located and note whether they are accessible or behind a counter.
 - the presence of any sales or promotional materials associated with e-cigarettes;
 - the age of the clerk;
 - GeoVerify their location position or take a picture of the retail outlet;

- confirm the Class of Trade of the location -- Gas Convenience, Independent Convenience, Chain Convenience, Grocery store, Pharmacy (either stand alone or inside a grocery store), Discount retailer, Mass merchandiser, Vape Shop (specialty e-cigarette retailer), Tobacconist; and
- confirm if the e-cigarettes, in a grocery/pharmacy combination store, are stored at the courtesy counter of the grocery store and/or at the NRT section of the pharmacy. The classification of the class of trade should be adjusted accordingly with respect to where they are sold.

The Adult Evaluator will familiarize him/herself with their scope of the project which has been organized below into the following parts:

The Teen Attempted Purchase

The Teen Evaluators will attempt to purchase an e-cigarette product. Since all are under 18 years of age, the purpose is to test retailer willingness to sell the products to youth.

For this aspect, the Adult Evaluator must not be present in the store or seen arriving at the store with the Teen Evaluator at the time the Teen Evaluator attempts to purchase an e-cigarette. The Adult Evaluator must, however, review the field form after completion by the teen to ensure validity and accuracy of all the information as required in the online reporting system.

Age And Sex Quotas

This study specifies that store visits for the purpose of attempting to purchase cigarettes must be completed by Teen Evaluators of a specified age AND sex. Strict observance of the age and sex requirement is imperative. UNDER NO CIRCUMSTANCES can one substitute Teen Evaluators of one designated age and sex with a Teen Evaluator of a different age or sex. In addition, one cannot substitute a visit by a designated Teen Evaluator to one type of store with a visit to a store of another type. For example, If the requirement is that grocery store “X” be visited by a 16 year old boy, that store must be visited by that person. It is not acceptable to visit the store either with a boy who is not 16 or with a 16 year old girl. Neither is it acceptable to use a 16 year old boy to visit a store that is not a grocery store, if that is not what the instructions entail.

If the Adult Evaluator encounters a problem completing the store quota as designated for their city, he/she must advise the Regional Field Coordinator within 24 hours. New instructions will then follow.

Supervision of Teen

The Adult Evaluator will be responsible for the working ethics, general appearance, actions and safe transportation of the Teen Evaluator once this project begins.

At the beginning of this project, the Adult Evaluator must establish a time and place to meet the Teen Evaluator for commencement of the day's work. If the team is required to work into the evenings, transportation to the Teen Evaluators home must be arranged.

Within the scope of this study, it is essential that the Teen Evaluator does not actually purchase an e-cigarette, but only attempts to purchase in order to complete the research. He/she should only carry less than \$5.00 of change in their pocket; no wallets or purses and no ID.

When the evaluation team meets to begin the day's work, the Adult Evaluator must make sure the Teen Evaluator looks their age and has done nothing to disguise their normal appearance, (i.e., doesn't look older than 15/16/17 years of age). The Teen Evaluators appearance should not have been altered with excessive jewelry or makeup, revealing clothing, or any other type of self-expression that may make the Teen appear older than they are. If the Adult Evaluator determines the Teen Evaluator appears older than they are because of any of these modifications, the Teen Evaluator will have to remove the jewelry and/or makeup/change into more appropriate clothing, etc., before the fieldwork begins.

Proximity of Schools/Malls

The Adult Evaluator will be required to indicate whether or not the store is located in close 'proximity' to a School or Shopping Mall/Plaza.

Proximity means within a 300-metre perimeter of the store. Therefore, at the completion of each store visit, it may be necessary to drive around the perimeter of the store to determine

whether or not there is a School or Mall (enclosed mall) close by. The only time this will not be necessary is when either a School or a Shopping Mall/Plaza is in clear view.

Product Displays

Adult Evaluators will look for e-cigarettes on display, and record 1) whether they are visible; 2) whether they are accessible to customers directly, or whether they are behind the counter as per the elements in the online reporting system.

Sales and Promotional Materials

In addition to e-cigarettes themselves, Adult Evaluators will look for any promotional signage or other materials that point to the availability of e-cigarettes as per the elements in the online reporting system.

Replacement Stores

In some cases, it may become necessary to replace a sample store. This may happen if the store on an Adult Evaluators list is closed, no longer fits the store description (i.e., has changed from a Grocery store to some other store type), or does not sell e-cigarettes.

It is VERY IMPORTANT to this study that every attempt is made to replace the sample store with another store of the same type.

If an attempt is made at finding a replacement and if a similar type store cannot be found, this fact must be reported within 24 hours to the Regional Field Coordinator, who will in turn communicate the problem immediately to the National Field Coordinator in Ottawa. Instructions will then follow on finding a replacement store.

Report Completion and Online Entry

After the Adult Evaluator has made observations at each store (see field instructions), they will monitor the results of the Teen Evaluators observations for accuracy. This will enable the Adult and Teen Evaluators to compare results at a time when their observations are still fresh in mind.

For each location visited, the Adult Evaluator is responsible for ensuring the entire report form is complete and accurate. In addition to recording their own observations, they are responsible for ensuring the Teen Evaluator completes the section of the report form which applies to his or her observations. The Adult Evaluator is also responsible for submitting the report online.

6.4 Teen Evaluator Instructions and Overview Form

Teen Evaluator Instructions and Overview

The Teen Evaluator will:

Ensure these instructions are read thoroughly before the project begins. Before the Teen Evaluator begins their day, they are to be sure to dress appropriate for their age. The Teen Evaluators are to appear their actual age and do nothing to disguise their appearance.

This part of the instructions applies to Grocery, Convenience Stores, Discount Stores, Mass Merchandisers and Pharmacies.

As a Teen Evaluator it will be your responsibility to:

- Enter the store with no more than \$5.00 in your pocket.
- Ensure you have no identification carried on your person at the time of entering the store and carry no purse or wallet.
- Ensure you have no other money on your person at the time of entering the store.
- Enter the store and observe whether there are any adult customers in the store at the time of your purchase attempt.
- Based on guidance from the Adult Evaluator, locate the e-cigarettes if they are visibly displayed.

- Where the e-cigarettes are accessible to you, take one of them to the counter and attempt to purchase.
- If the e-cigarettes are not accessible (because they are behind or under the counter) ask the clerk for an e-cigarette and attempt to purchase.
 - When asking for an e-cigarette, ask for a disposable product. IF NOT available: Ask for a basic “starter’s kit.”
 - If offered options for several different brands or flavors of disposables or e-liquids, ask for the least expensive brand, select any flavor (which one does not matter) and tell the clerk you will take that one.
 - If offered options for several different “starter kits”, ask for the least expensive brand and tell the clerk you will take that one.
 - If the “starter kit” chosen does not include e-liquid the clerk may ask whether you want to purchase e-liquid to use with the “starter kit”. Ask for the smallest and cheapest option, select any flavor (which one does not matter) and tell the clerk you will take that one.
- If the clerk asks your age, claim to be 19 years of age.
- If the clerk asks who the e-cigarette is for, answer "me"!
- If you are asked if you have ID, say you do not have any with you (don't search for ID).
- If you are asked if you know the age regulations, say yes.
- If the clerk points to a mandatory age of purchase sign, shrug and say nothing.
- If the clerk says he/she cannot sell you the product without proper ID, say “I understand – thank you anyway” and politely leave the premises.
- If the clerk advises you of the price of the e-cigarette before ringing it up at the cash register or rings it up at the cash register absent of telling you the price, count out the money you have in your pocket and indicate that this is obviously not enough, or pretend to have just noticed that you are missing some money you thought you had. Tell them that you will go and get more money.
- If the clerk offers to sell a less expensive product, indicate that you prefer to get the item you wanted and politely leave.

The following addresses procedures for Grocery/Pharmacy combination stores:

If e-cigarettes are sold at BOTH the grocery courtesy counter AND the pharmacy of the store, then try to mystery shop both counters without being noticed by the first one. Come back later, if you can. Two reports will be required if you are successful, and you will record one as grocery and one as pharmacy. You will be compensated for two reports instead of just one visit.

The following addresses procedures for Vape Shops only

As a Teen Evaluator it will be your responsibility to:

- Enter the store with no more than \$5.00 in your pockets, not kept in a wallet.
- Ensure you have no identification carried on your person at the time of entering the store. Carry no purse or wallet.
- Ensure you have no other money on your person at the time of entering the store.
- Enter the store and observe whether there are any adult customers in the store at the time of your purchase attempt.
- Based on guidance from the Adult Evaluator, please locate disposable e-cigarettes if they are visibly displayed.
- If the disposable e-cigarettes are accessible to you, take one of them to the counter and attempt to purchase.
- If the disposable e-cigarettes were identified as not visible or not accessible by the Adult Evaluator (because they are behind or under the counter) ask the clerk for a disposable e-cigarette and attempt to purchase.
 - If offered options for several different brands or flavors, ask for the least expensive brand and select any flavor (which one does not matter) and tell the clerk you will take that one.
- If no disposable products are on sale, ask a clerk for the least expensive “starter kit.”
 - When presented with the least expensive kit, tell the clerk you will take that one.
 - If presented options between multiple “least expensive” kits, ask the clerk for the most popular one and tell the clerk you will take that one.
 - If the “starter kit” chosen does not include e-liquid the clerk may ask whether you want to purchase liquid to use with the “starter kit”. Ask for the smallest and cheapest option.
 - When the clerk asks what flavor you want, ask for the options and select any one (which one does not matter).
 - If the clerk asks what level of nicotine you want in the liquid, tell him/her that you don't want nicotine.
- If the clerk asks your age, claim to be 19 years of age.
- If the clerk asks who the cigarettes are for, answer "me"!
- If you are asked if you have ID, say you do not have any with you (don't search for ID).

- If you are asked if you know the age regulations, say yes.
- If the clerk points to a mandatory age of purchase sign, shrug and say nothing.
- If the clerk says he/she cannot sell you the product without proper ID, say “I understand – thank you anyway” and politely leave the premises.
- If the clerk selects the e-cigarette and advises you of the price before ringing it up at the cash register or rings it up at the cash register absent of telling you the price, count out the money you have in your pocket and indicate that this is obviously not enough, or pretend to have just noticed that you are missing some money you thought you had. Tell them that you will go and get more money.
- If the clerk offers to sell a less expensive product, indicate that you prefer to get the item you wanted and politely leave.

After leaving each establishment, fill in the form designated to that store. Ensure all information is completed before you proceed to the next store. Confer with your Adult Evaluator at all times during this project to ensure complete accuracy.

Note: Be sure that forms are filled in completely out of the view of the retailer or store patrons. It is important to this study that no one in the store becomes aware of the true nature and intent of your activities.

6.5 Sample Images of e-cigarette packaging and Resource Web Links:

Disposables

Refillables



Starter Kits



Starter Kits

Premium blu E-Cigarette Starter Kit - Black

- Our most popular starter kit
- Comes in black or white
- 1 New blu Premium e-cigarette pack with Social Features!
- 2 blu batteries
- 1 blu wall charger
- 1 blu USB charger
- 1 five-pack cartridges in the strength and flavor of your choice

Sample links

The following web site links have been provided as samples for research purposes only. They are intended to be referenced WITH THE ADULT EVALUATORS to educate TEEN EVALUATORS on the e-cigarette products and terminology and to familiarize them with the products prior to Teen fieldwork.

https://en.wikipedia.org/wiki/Electronic_cigarette ENGLISH

<http://esteamcanada.com/> ENGLISH ONLY

<https://sirvapealot.ca/en/> ENGLISH

<https://sirvapealot.ca/fr/> FRENCH

<http://quebecvapeboutique.com/boutique/fr> FRENCH

<http://quebecvapeboutique.com/boutique/en> ENGLISH

<http://www.smokenv.com/> ENGLISH

<http://evovapor.com/> ENGLISH

6.6 Adult Recruitment and Agreement Form

Adult Recruitment and Agreement Form

We Check has been contracted by Health Canada to conduct research on the willingness of retailers to sell e-cigarette products to youth. At the development stage of these Operational Guidelines the province of Nova Scotia (as at May 31, 2015) and New Brunswick (as at July 1, 2015) have enacted minimum age restrictions making the sale of e-cigarettes to youth under the age of 19 an offence and that e-cigarette be restricted from visible display.

This study is intended for research purposes only and not intended for a measure of compliance. Your participation in this project will remain completely confidential.

The stores on your list have already been confirmed as e-cigarette retailers. Your responsibility is to observe and document whether they are accessible, where they are placed and whether you see any e-cigarette promotional material. If you do not see any, it is usually because the retailer has decided to (or is obligated by law or store policy to) store them under the counter out-of-sight or conceal them (e.g. with tobacco products).

As an Adult Evaluator, you will be required to drive a Teen Evaluator to the selected retailers. You will ensure that you park the vehicle off sight or around the corner from the store so that the retailers do not spot you together. You will enter the store and look for the e-cigarettes and take a mental note of where they are displayed and whether they are accessible or visible behind the clerk's counter. Also, look for promotional materials related to e-cigarettes. If you do not see any, exit the store. Tell the teen where the e-cigarettes were so that he/she can go directly there upon their turn to enter.

At the end of the day, you will be required to drive the Teen Evaluator home. (Detailed instructions will be provided to you, once full recruitment is completed, on the proper procedures to follow).

All attempts have been made to organize lists of stores in clusters. You are responsible for mapping out a cost-effective and time-efficient route for each day you are conducting fieldwork. You will be required to use the GeoVerify App to record the location position, or to take a picture of the retail outlet and upload it into the report.

You will notify your Regional Field Coordinator of your intended work schedule prior to commencement of the project. You will be responsible for ensuring the Teen Evaluator does his or her part of the reporting completely and accurately and you will be responsible for ensuring the report gets submitted on time into the online reporting system. You will also be responsible for supervising and providing guidance related to the execution of the Teen Evaluators duties.

Should you be hired for this work, you agree to follow the guidelines set out by We Check throughout the period you are on the assignment. By participating in this research, you are agreeing to keep this project confidential until your role in it has ended and up to one year thereafter. You will be paid a fee for your participation (which will be established once full recruitment has taken place and which is based on 100% completion of required visits in your area).

This project is scheduled to start the **first week of July 2015** and your part in the project will likely take no more than a few days to complete.

If you wish to participate in this project, fill in the recruitment form.

Adult:

1. Name: _____

2. Address _____ City _____ Province _____ Postal Code _____

3. Date of Birth: (Month) _____ (Day) _____ (Year) _____

4. Sex: Male _____ Female _____

5. Languages Spoken: English _____ French _____ Both _____

6. Does any member of your immediate family own or work in a retail establishment that sells electronic cigarette products?

Yes No Initial here: _____

7. Does any member of your immediate family work for an electronic cigarette manufacturer or distributor?

Yes No Initial here: _____

8. I agree to the confidentiality clause listed below.

Yes No

Indemnification

9. The Contractor shall at all times indemnify and render harmless We Check, its directors, officers, employees and any others for whom it may be responsible in law, from and against all losses, claims (including claims made by the Contractor's personnel under worker's compensation legislation), demands, awards, judgements, actions and proceedings by whomsoever made, brought or prosecuted

- (i) in respect of loss of, damage to or destruction of property (including loss or damages sustained by the Contractor),
- (ii) in respect of personal injury (including death),
- (iii) resulting from breach of any of the warranties set out in this agreement,
- (iv) in respect of the use or disposal of anything furnished to We Check pursuant to this agreement, and
- (v) all associated costs and expenses (including legal fees and disbursements) suffered or incurred by We Check arising out of, attributable to, or in any way connected with this agreement and whether or not caused by the Contractor's negligence, except to the extent to which such loss or damage has arisen out of We Check's negligence.

10. Have you ever been convicted of a crime

for which you have not been granted a pardon? Yes No

11. I certify that the Teen Evaluator I have chosen to work with is known to me and has agreed to work on this project with me knowing the requirements of the fieldwork. Yes No

This project is being conducted by We Check on behalf of Health Canada. All information in conjunction with this project is strictly confidential and cannot be discussed or shared in any way in order to ensure that full impartiality of the results are achieved.

Adult's Signature: _____

Print Name:

Date:

6.7 Teen Recruitment and Consent Form

Teen Recruitment and Consent Form

We Check has been contracted by Health Canada to conduct research on the willingness of retailers to sell e-cigarette products to youth. At the development stage of these Operational Guidelines the province of Nova Scotia (as at May 31, 2015) and New Brunswick (as at July 1, 2015) have enacted minimum age restrictions making the sale of e-cigarettes to youth under the age of 19 an offence and that e-cigarette be restricted from visible display.

This study is intended for research purposes only and not intended for a measure of compliance. Your participation in this project will remain completely confidential.

As a Teen Evaluator, you will be required to ATTEMPT to purchase a disposable e-cigarette or a starter kit for e-cigarettes BUT UNDER NO CIRCUMSTANCES COMPLETE THE PURCHASE. (Detailed instructions will be provided to you, once full recruitment is completed, on the proper procedures to follow).

During your participation in the project, you will be working with an Adult Evaluator. Under the direction of a Regional Field Coordinator, the Adult Evaluator will establish your working schedule prior to commencement of the project. Should you be hired for this work, you agree to follow the guidelines set out by your Adult Evaluator throughout the period you are on the assignment.

By participating in this research, you are agreeing to keep this project confidential until your role in it has ended and up to one year thereafter. You will be paid a fee for your participation, which will be established once the count of locations and full recruitment has taken place.

This project is scheduled to start the **first week of July 2015** and your part in the project will likely take no more than a few days to complete. The Adult Evaluator is responsible for your transportation to and from your home.

If you wish to participate in this project, fill in the recruitment form and ensure that your parent or legal guardian is fully briefed and has co-signed the consent portion of your request to participate.

A photo ID with your with your birth date is required for proof of age. In order to preserve the integrity of the research, your birthday must not be during the field research, and can be before or after but must be the age you were hired for.

Teen:

1. Name: _____

2. Address _____ City _____ Province _____ Postal Code _____

3. Date of Birth: (Month) _____ (Day) _____ (Year) _____

4. Sex: Male _____ Female _____

5. Languages Spoken: English _____ French _____ Both _____

6. Does any member of your immediate family own or work in a retail establishment that sells electronic cigarette products?

Yes No Initial here: _____

7. Does any member of your immediate family work for an electronic cigarette manufacturer or distributor?

Yes No Initial here: _____

8. I agree to the confidentiality clause listed below.

Yes No

9. Indemnification

The Contractor shall at all times indemnify and render harmless We Check, its directors, officers, employees and any others for whom it may be responsible in law, from and against all losses, claims (including claims made by the Contractor's personnel under worker's compensation legislation), demands, awards, judgements, actions and proceedings by whomsoever made, brought or prosecuted

- (i) in respect of loss of, damage to or destruction of property (including loss or damages sustained by the Contractor),
- (ii) in respect of personal injury (including death),
- (iii) resulting from breach of any of the warranties set out in this agreement,
- (iv) in respect of the use or disposal of anything furnished to We Check pursuant to this agreement, and
- (v) all associated costs and expenses (including legal fees and disbursements) suffered or incurred by We Check arising out of, attributable to, or in any way connected with this agreement and

whether or not caused by the Contractor's negligence, except to the extent to which such loss or damage has arisen out of We Check's negligence.

- 10 I certify that the Adult Evaluator I have chosen to work with is known to me and has agreed to work on this project with me knowing the requirements of the fieldwork. Yes No

This project is being conducted by We Check on behalf of Health Canada. All information in conjunction with this project is strictly confidential and cannot be discussed or shared in any way in order to ensure that full impartiality of the results are achieved.

Teen's Signature

Print Name:

Date:

PARENTAL CONSENT

By signing this form, I acknowledge that I am the parent or legal guardian of the Teen named at the top of this requirement form and that I understand the scope of the project my child will be involved in. I agree to his/her participation in this research project and understand that he/she will be working with an adult supervisor. I also agree to abide by the confidentiality clause above.

Parent/Guardian Signature:

Print Name:

Date:

7. Procedures for Tabulating and Reporting Measurements

7.1 Verification

Responsibility of Adult Evaluators

Adult Evaluators will be responsible for compiling Teen Evaluators observations with their own and entering the reports online into We Check's online reporting system. The system will not allow a person entering a report to "complete" the report entry process until all questions are answered. Any unusual behaviour from the retailer or the experience must be noted in the comment box provided.

Responsibility of Regional Field Coordinators

As fieldwork in each city is completed, the Regional Field Coordinator will verify that all reports have been entered in the reporting system. This person will also review the GeoVerify or picture and comments, which the Adult Evaluator must provide in a certain section of the report form, to ensure harmony between the comments and the answers to the multiple choice questions.

Should any questions arise from this process; Adult Evaluators will be contacted for more information.

7.2 Weighting and Data Projections

Once all records are coded, raw data will be weighted statistically based on Ipsos universe estimates and the number of stores in each trade class cell in each city (refer to section 3.8 Statistical Weighting and Sample Distribution Tables).

The weightings for national measurements will be based on store distributions by class of trade across the 20 regions sampled. Weights for provincial estimates will only be applied in provinces where more than one city was sampled and will be based on store distributions by class of trade across sampled cities in the same province.

No attempt will be made to project estimates for sampled cities to a universe beyond the geographic boundaries of these cities.

7.3 Reporting of Results

In the final report of the 2015 e-cigarette retailer study:

- an overall measure of willingness to sell to youth will be provided;

- results of findings regarding the display of e-cigarette products will be reported in a separate section of the final report; and
- weighted results will be reported by class of trade for each province and nationally;

In addition, directional data relating to sales to youth will be included in the summary (supported by statistical tables) based on ancillary observations gathered at the time of the visit. These include results on the willingness or not of retailers to sell e-cigarette products to youth based on:

- time of visit;
- sex of clerk;
- sex of minor;
- age of teen;
- perceived age of clerk;
- presence of other adults in the store at the same time as our attempted purchase; and
- proximity of store to school or mall (enclosed mall).

This directional data will be reported in detail at the national level and observations will be made on a regional basis, but with a measure of caution, owing to the expected small size of some regional sub-samples.

The findings reported, unless otherwise indicated, will be based on the weighted data.

8. Electronic Cigarette Provincial Restrictions

Newfoundland and Labrador

- No province wide restrictions in place or in the works

Prince Edward Island

- Tabled legislation to treat same as cigarettes (limit places can smoke, out of view at retail, age restriction)

Nova Scotia

- Legislation effective May 31, 2015
- Ban on use indoor public spaces, workplaces, treat e-cigarette same as tobacco (keep them out of view, unless the store sells only e-cigarettes and minors are not permitted), no point-of-sale promotion, no signage or advertising outside the store, no selling to minors (youth under 19), no selling in pharmacies and other places where tobacco sales are prohibited.
- Urging federal government to regulate flavored e-cigarettes, e-juice

New Brunswick

- New Brunswick changes to the Tobacco Sales Act come into effect July 1 to include:
- a ban on the sale of e-cigarettes and their liquids to persons under 19 years of age;
- vapour shops will have age and promotion restrictions;
- the sale of smoking supplies to minors will be prohibited and these supplies will be hidden from sight. This will include rolling papers, blunt wraps, cigarette filters, cigarette holders and pipes; and
- product displays and advertising inside a tobacconist shop or a vapour shop will not be allowed to be visible from the outside, and outside advertisement will be prohibited.

Quebec

- No province wide restrictions in place or in the works

Ontario

- Electronic Cigarettes Act, 2015 (as part of Bill 45, Making Healthier Choices Act, 2015 Schedule 3)

- Amendment to the Some- Free Ontario Act to include electronic cigarette restrictions (Schedule 3).
- Minimum age restriction 19
- Received assent May 28, 2015 and comes into force on a day yet to be named by proclamation of the Lieutenant Governor.

Manitoba

- No province wide restrictions in place or in the works

Saskatchewan

- No province wide restrictions in place or in the works

Alberta

- No province wide restrictions in place or in the works
- Some city ban (e.g. Red Deer) on use of e-cigarettes

British Columbia

- Bill 14 - 2015: Tobacco Control Amendment Act, 2015
- Looks like age restrictions, display ban, limit use in public places proposed

https://www.leg.bc.ca/40th4th/1st_read/gov14-1.htm

9. Schedule of Activities

The schedule of activities for this research appears below.

The field component of the work requirements is scheduled to last about 8 weeks, from the first week of July 2015 to the beginning of September 2015.

SCHEDULE OF ACTIVITIES: 2015-2016				
Task ID	Delivery Date (date or week of)	Task Description	Individual	Est. # days ¹
1	April 24	Initial meeting	Tracey/Julie/Heather/ Becky / Will/HC	1.0
		UNIVERSE STUDY, SAMPLE PLAN AND OPERATIONAL GUIDELINES		
2	April 27	Research sources for the database of retailers	Tracey	0.5
3	April 27	Begin immediately to start the research required to develop the universe list, filtering through the retailer's database	Tracey/Julie/We Check support staff	20.0
4	May 4	Verify the database by using information sources as outlined in the proposal to update the data, including the fieldwork	Tracey/Julie/Field Researchers	220.0
5	May 11	Clean the data and produce the final "universe" list, 1-2 pages of study and outcome; Deliver by email the Universe findings to Health Canada	Tracey/Will/Becky	12.0
6	May 18	Analyses of Retail Channels and Oral Presentation	Tracey/Will/ HC	0.5
7	June 11	Develop and Deliver the Draft Sample Plan	Steve/Will	3.0
8	June 11	Obtain feedback and finalize the Sample Plan and Operational Guidelines	HC/Will/Tracey	2.0
9	June 19	Drawing of Sample of Retail Outlets for the 2015 Study	Tracey/Julie	12.0

¹ Compounded number of days for all personnel. Some tasks are conducted simultaneously, such as 24 shoppers to complete fieldwork over 10 days = 240 days. Does not include Health Canada team time.

10	June 19	Develop and Deliver the Draft Operational Guidelines	Tracey/Will	4.0
11	June 22	Submit Milestone 1 invoice	Ipsos	0.2
		ASSEMBLY OF TEAMS AND PRE-FIELDWORK		
12	May 4	Prepare and Send out assignment opportunity emails to the shopper database	Julie/NFC	1.0
13	May 4	Regional Field Coordinator (RFC) Selections	Julie/NFC	5.0
14	May 11	RFC training	Julie/NFC	4.0
15	May 11 – June 30	Preliminary screening of team observer candidates	NFC/RFC	15.0
16	June 30	Sample distribution by team observers in each city	Julie/NFC	5.0
17	June 24	Develop questionnaires in English for approval by HC	Becky/Tracey/Julie	5.0

SCHEDULE OF ACTIVITIES: 2015-2016 (Cont'd)				
Task ID	Delivery Date (date or week of)	Task Description	Individual	Est. # days
18	June 25	Feedback from HC on the Questionnaires	HC	0.0
19	June 26	Build questionnaires in the online reporting system	System admin We Check	4.0
20	July 3	All shopper documents translated	We Check	4.0
21	June 30	Prepare shopper training kits	Julie/NFC	2.0
22	June 25 – July 10	Interview and selection of Team Observers	RFC	21.0
23	July 10	Submit Milestone 2 invoice	Ipsos	0.2
		FIELDWORK		
24	July 2 – Sep. 7	Fieldwork begins after Canada Day	Shoppers	300.0
25	July 2 – Sep. 7	Monitor Fieldwork activity	NFC/RFC	37.0
26	July 2 – Sep. 7	Report Reviewing	RFC	17.0
27	Sep. 8 – Sep. 30	Contingency weeks	NFC/RFC	5.0
28	Sep. 30	Finalize Reports	NFC	2.0
29	Sep. 30	Verify and clean data	Tracey/Julie	5.0
30	Sep. 30	Submit Milestone 3 invoice	Ipsos	0.2
		DATA ANALYSIS AND REPORTING		
31	Sep. 30 - Oct. 14	Data Compilation, Weighting and Analysis	Steve	21.0
32	Nov. 2	Proof data; Write Report in English	Will /Tracey	20.0
33	Nov. 9	Copy Proofing	Proofreader	5.00
34	Nov. 15	Finalize Draft English Report	Ipsos	2.0
38	Nov. 16	English Draft - Delivery	Will/Tracey	0.5

39	Dec. 7	Feedback from HC	HC	
40	Dec. 14	Revisions to Final Report	Tracey/ Will	3.0
41	Dec. 29	Deliver Final English Report and files	Tracey/ Will	0.5
42	Jan. 18	French translation of Report, Tables and Charts	We Check	10.0
43	Jan. 25	Review translation of Draft French Report	Tracey/Proofreader	3.0
44	Feb. 1	Deliver Draft French Report	Tracey	0.5
45	Feb. 15	Feedback on French Report from HC	HC	
46	Feb. 22	Revisions to French Report	Tracey	3.0
47	Feb. 29	Deliver Final French Report and files	Tracey/Ipsos	2.0
48	Feb. 29	Submit Milestone 4 invoice	Ipsos	0.2
Total person days:				776