

# ALTERNATIVE RESEARCH INITIATIVE NEWSLETTER

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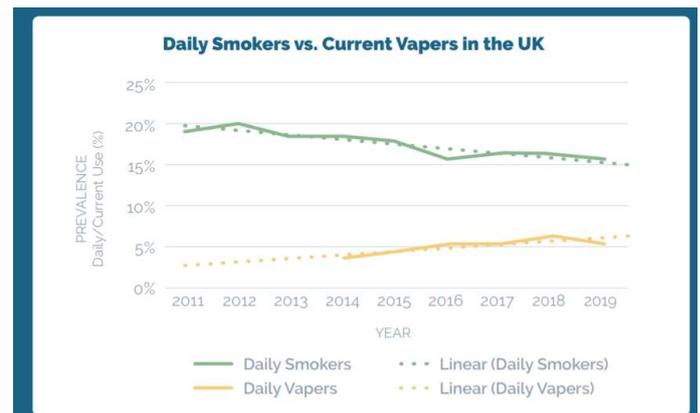
## The positive impact of e-cigarettes in UK

By Christopher Snowden

Few countries have embraced vaping with as much enthusiasm as the United Kingdom. It currently has three million regular vapers (six per cent of the adult population) and Public Health England's evidence reviews on e-cigarettes are cited around the world. In contrast to much of Europe and North America, public health professionals in Britain broadly regard the emergence of e-cigarettes as a welcome development that has significantly reduced the smoking rate since they became popular a decade ago.

As in many other countries, vaping initially grew through word-of-mouth recommendation. In the early days - before 2013 - the market was exclusively made up of independent retailers online and on high streets.

By 2011, there was no consensus in UK tobacco control on how e-cigarettes should be regulated. The government initially handed the category over to the Medicines and Healthcare Products Regulatory Authority (MHRA) with instructions to produce 'light touch' regulation, but vapers feared that regulation by an agency that was used to dealing with pharmaceuticals would result in the e-cigarette market being handed over to a few large corporations who would produce unappealing products. The resulting regulation proposed by MHRA confirmed these fears, with the agency recommending all vape products be taken off the market, but when the European Commission announced plans to regulate the category, the market was left alone until a new Tobacco Products Directive was enforced in 2016. The European Commission leant towards medical regulation at first, but this was later dropped after vapers successfully



lobbed against it. There is a parallel universe in which the UK e-cigarette market was crushed by regulation and vaping devices were available only on prescription. Why didn't this happen? Firstly, the UK has a history of understanding and appreciating tobacco harm reduction as a concept. A British nicotine researcher, Michael Russell, observed in the 1970s that "people smoke for nicotine but they die from the tar". With some exceptions, anti-smoking activists in the UK have not displayed the moral objections to nicotine use that are often seen in the USA and Australia. The British anti-smoking group Action on Smoking and Health, under the leadership of Clive Bates (1997-2003), campaigned for the EU's ban on oral tobacco to be lifted. With the intellectual groundwork for tobacco harm reduction in place, support for the vaping revolution became a matter of political will.

David Halpern, the head of the UK's Behavioural Insights Team, encountered e-cigarettes by chance in 2010 and told the government to "seek to make e-cigs available, and to use regulation not to ban them but to improve their quality and reliability".

By 2012, e-cigarettes were becoming popular all over the country and a backlash was underway. At the same time, a growing number of academics, such as Linda Bauld and

Lynne Dawkins, were seeing the benefits of vaping with their own eyes, and the highly influential anti-smoking group Action on Smoking and Health was being persuaded of its potential. After five years in which the smoking rate had barely moved despite a slew of tough anti-smoking policies, more smokers were suddenly quitting. Vapers were sharing their stories of giving up cigarettes after decades of smoking, often without intending to quit when they first tried an e-cigarette. From 2013, this began to be shown in randomised controlled trials, the gold standard of scientific evidence. In 2014, Public Health England (PHE) published a report by two leading anti-tobacco academics which concluded that the “opportunity to harness” the potential of e-cigarettes “should not be missed”. The following year, PHE released its landmark report on e-cigarettes, a 113 page document looking at every aspect of the issue. It found regular use of e-cigarettes by nonsmokers to be rare and noted the growing evidence showing that vaping helped smokers quit. It concluded that medical licensing of e-cigarettes was “not commercially attractive” and would likely favour “larger manufacturers including the tobacco industry”. Most famously, it officially endorsed previous estimates that e-cigarettes were 95 per cent safer than cigarettes. The Public Health England report was followed in 2016 by a report from the Royal College of Physicians (RCP) which confirmed that the health risks of long-term vaping are “unlikely to exceed 5% of the harm from smoking tobacco smoke” and concluded that there were likely to be “significant health gains” to be had from promoting “the use of non-tobacco nicotine, including e-cigarettes, as widely as possible”. This was a significant intervention as the RCP had first confirmed the association between smoking and lung cancer in 1962. The following year, the British Medical Association reversed its position on banning vaping in public places and admitted that its concerns about vaping

‘renormalising’ smoking “have not materialised”. Today, the UK continues to abide by the EU’s advertising restrictions and product regulation, including a 20 mg/ml limit on nicotine content, but has never ‘gold-plated’ these rules. Unlike many European countries, it has no ‘sin tax’ on e-cigarette fluid and there are few legal restrictions on where people can vape. Between 2012 and 2016, the UK’s smoking rate fell from 20.4 per cent to 16.1 per cent. Official statistics for e-cigarette use were not available until 2014, but the number of vapers was negligible in 2010 before rising to 3.7 per cent of adults aged 16 and over in 2014 and to 5.6 per cent in 2016. None of Britain’s millions of vapers appears to have died or contracted any serious disease as a result of their new habit. Fears that vaping would act as a ‘gateway’ to smoking have been shown to be unfounded. In 2019, according to the Office for National Statistics, “the proportion of vapers was highest among current cigarette smokers (15.5%) and ex-cigarette smokers (11.7%). Only 0.4% of people who have never smoked reported that they currently vape”. The UK now has a lower smoking rate than any EU country apart from Sweden (where another reduced risk nicotine product, snus, has acted as an effective substitute for cigarettes). PHE has opposed ban on flavoured e-cigarette fluid and the House of Commons Select Committee on Science and Technology has criticised the EU’s legal nicotine limits on e-cigarettes, its advertising ban, and its restrictions on tank size. It called for a review of these “regulatory anomalies”. The success of the UK’s relatively liberal approach to vaping is plain to see. The smoking rate has dropped by a quarter since 2012. *This article has adopted from the study – Vaping Works - International Best Practices: United Kingdom, New Zealand, France and Canada*

## Ireland aiming to have almost no smokers by 2025

2025 is the target set by the annual report from Tobacco Free Ireland, the country’s national tobacco control policy. In practice, this would mean a smoking prevalence rate of less than 5% in the country. The action plan, which was first published in March 2015, has been welcomed by Health Minister Stephen Donnelly and Minister for State and Public Health, Wellbeing and the National Drugs Strategy, Frank Feighan. “By working to remove smoking from daily life in Ireland and educating young people on the dangers of tobacco, while making cessation assistance as widely available as possible, we can continue to build on the promising results we have seen in recent years,” Donnelly said in a statement. “I urge anyone that is thinking of quitting to act now. Stopping smoking remains one of the best decisions a person can make for their health”. The latest report outlines what the department described as “several key achievements” in 2020 to implement the plan. These include: The inclusion of information on the dangers of tobacco use in Healthy Choices 1, the first substance misuse module of Junior Cycle Social, Personal and Health Education, aimed at first-year students. The launch of a new QUIT marketing campaign by HSE



National Communications and the HSE Tobacco Free Ireland Programme, called The Last Stop. The completion by the Health Research Board of three comprehensive evidence reviews on electronic cigarettes and heated tobacco products commissioned by the Minister a further increase of 50 cent on a packet of cigarettes with pro-rata increases on other tobacco products in Budget 2021 “The last 18 months has further highlighted the importance of being proactive about our own health and the health of those around us. The HSE QUIT service remains available to anyone that needs it,” added Minister Donnelly. Taken from <https://www.offalyexpress.ie/>

# Democratize access to vaping products

By Adam T. Rizwani

While Public Health Canada has implemented a diverse and seemingly complex regulatory approach to vaping products, ultimately they still acknowledge that "vaping products and e-cigarettes deliver nicotine in a less harmful way than smoking cigarettes" and "there are short-term general health improvements if you completely switch from smoking cigarettes to vaping products."

In the Public Health England's (PHE) 2021 report on vaping, they found that "using a vaping product as part of a quit attempt in local stop smoking services had some of the highest quit success rates – between 59.7% and 74% in 2019 and 2020." It's clear that "the rapid decline in cigarette sales shows vaping products are clearly working to help adult smokers quit using tobacco products" (Devery, 2020). That stated, we at STLTH™ emphatically endorsed the regulations previously passed by Health Canada that hold the maximum concentration to be 66 mg/mL because we found that maximum strength to be diverse enough to satisfy all classes of adult smokers in each stage of their smoking cessation journeys.

New Zealand, England, and other members of the EU have long endorsed vaping as an effective NRT (Nicotine Replacement Therapy). New Zealand has recently formally legalized vaping to ensure that there is a comprehensive and intuitive legislative framework in place. In this trailblazing country, "Nicotine vaping products are not strictly regulated like tobacco products (as in Australia) but according to the true level of risk of the products" (Mendelsohn, 2020). As such, they are treated like the NRT that they are, and respectfully handled through a unique and modified framework that acknowledges their potential to help adult smokers quit using combustible tobacco products. This sort of inclusive and holistic regulatory approach would be equally beneficial in the Pakistani market.

It is necessary that we democratize access to vaping products. Tobacco use and the health-related effects of combustible smoking are not directly tied to a specific socio-economic class, gender, or race. It is essential to limit the taxation levels applied to vaping products to increase its availability to any adult smoker who wants to quit smoking tobacco products. Only through a limited taxation scheme, can we maintain accessibility to vaping products, encouraging them to be used without prejudice, as the harm reduction tool that they are.

Similar to New Zealand, STLTH™ recommends that instead of limiting nicotine strengths available to adult smokers, the better option is to more scrupulously regulate the marketing and sale of the products, in Canada, Pakistan, and worldwide. It is absolutely fundamental that Point of Sale (POS) vaping products be regulated, licensed, and restricted to shops only accessible to adults. Minors should never be exposed to POS vaping products and the promotion of these products shouldn't be visible to anyone under the age of the majority. It logically follows that there should then be an increase in the fines for retailers who sell to minors. Every preventative measure must be taken to ensure that minors and non-smokers do not have access to vaping products for any reason. Retailers who take advantage of these two groups of



consumers should be subjected to increasingly high fines and penalties. Again, STLTH recommended this in Canada and we believe it could be beneficially applied in the Pakistani market.

There should be an increased focus on creating educational resources and spreading awareness about the detrimental effects of vaping products on youth. STLTH™ endorses and supports this goal in Canada and Pakistan to educate youth and prioritize a knowledge-based generation that chooses not to try vaping products. Media plays a massive role not only in popular opinion but increasingly in the awareness about vaping products. It is crucial to educate youth and adults alike in the importance of critical thinking skills when faced with misinformation as well as actively combatting otherwise influenced and manipulated content regarding vaping products. We are all working towards helping adult smokers quit using tobacco products; we are not interested in creating another generation of consumers who are addicted to tobacco.

A 2015 study that analyzed data collected in-person from 215 vape shop customers found that the respondents had, on average, used e-cigarettes for seven months and that two-thirds (66%) had successfully quit smoking. The study also found that 72% respondents used flavoured products and those who used these flavours were significantly more likely ( $p=0.035$ ) to quit smoking entirely than those who relied on tobacco or menthol flavours alone. In fact, quitting was two-and-a-half times more likely among respondents using fruity, candy, or bakery-flavoured e-liquids. The study's authors concluded that "regulators should carefully examine the cost-benefit of banning flavours," as "the current available science would not support a decision to do so."

Any effort to limit flavoured e-cigarette products does a disservice to adult smokers who try to quit smoking through the use of e-cigarettes. Flavour bans have the unfortunate effect of creating a black market where non-compliant products can be purchased, consequently endangering the health and safety of adult ENDS users. Flavours are one of the most attractive elements of vaping products and commonly entices adult smokers to give vaping products a try. Flavours are a positive option for adult smokers to move away from unpleasant tobacco tastes to a more enjoyable flavour, while still satisfying their nicotine cravings.

The author is President and Managing Director of STLTH, a leading manufacturer of electronic cigarettes and vaping products, compliance, and innovation, in the Canadian vaping industry.

# Uncertainty for vaping industry

By Jim McDonald

After a year of hype and endless stories about FDA's Sept. 9, 2021 decisions that would "determine the future of vaping," the agency punted on its obligations and left the vaping industry twisting in the wind. It issued no product authorizations, announced no exemptions for manufacturers allowing continued sales, and offered no enforcement discretion assurances for businesses whose products haven't been denied.

The agency reaffirmed in April that it would not (and could not, based on the court order) issue a blanket exemption to the industry. Companies that have not received a specific Marketing Denial Order or authorization for a product will technically be selling it illegally, but the agency said it recognizes "that we are unable, as a practical matter, to take enforcement action against every illegally marketed tobacco product, and that we need to make the best use of Agency resources."

That probably means that, unless local authorities take action, there will be no real enforcement against products still on the market. The FDA notes that "we have identified flavored products that appeal to youth as enforcement priorities."

The FDA says it has taken "action on about 93% of the total timely-submitted applications"—meaning it has denied the applications of 132 small companies' flavored products. (The

list of Marketing Denial Orders was updated today with the names of companies receiving denials for some or all of their submitted products.) An FDA spokesperson confirmed to Vaping360 that the process is not complete, and the agency will continue to issue MDOs to additional companies.

Juul is the biggest seller in the convenience store/gas station vape market. The agency announced no exemption that would specifically protect JUUL if it remains on the market; the company will face the same risk of enforcement as other non-flavored products. Reynolds American neither sought nor received an exemption from enforcement for its Vuse and Velo products, but intends to leave them on the market based on the FDA's enforcement discretion statement. Essentially, these large companies believe the risk of enforcement actions is low, since they are not currently selling vapor products in flavors other than tobacco and menthol.

Mainstream media outlets have portrayed the entire PMTA debacle as a decision on Juul Labs' products, with barely any attention paid to the thousands of independent small- and medium-sized companies whose fortunes will be largely determined by the FDA's choices.

This is an abridged version of the article originally published on [www.vaping360.com](http://www.vaping360.com)

## Unbalanced debate on harm reduction

Kenneth E. Warner is among a group of prominent tobacco control experts who warn that focusing too much on nicotine's potential risks for youth has resulted in an "unbalanced" debate that overlooks the potential benefits of tobacco harm reduction. Warner, from the University of Michigan's School of Public Health, is among 15 past presidents of the Society for Research on Nicotine and Tobacco who express their concerns in a jointly-authored paper published recently in the American Journal of Public Health.

The paper provides a comprehensive review of the risks of e-cigarettes with a focus on the United States. However, many of the arguments are relevant to other lower-risk nicotine products such as Swedish snus and nicotine pouches. "All nicotine and tobacco products should be regulated on the basis of their relative risk," Warner tells Snusforumet.

As US and European regulators grapple with how to regulate new nicotine products like e-cigarettes and nicotine pouches, Warner and his colleagues are frustrated by what he calls an "unbalanced" debate about tobacco harm reduction. "Most US health organizations, media coverage, and policymakers have focused primarily on risks to youths," the authors write.

Alarming headlines about a youth vaping "epidemic" in the US and unfounded claims in Sweden that snus and nicotine pouches are a gateway to cigarette smoking contribute to a misperception among policymakers and the public about the relative risks of such products.

Warner says there is "little consideration given to the potential benefits for adult smokers" of alternative nicotine products. "We hope to get the attention of the public health community, the media, and legislators to consider the evidence we present in the paper." Warner has a long history in tobacco control in the US and globally. In addition to being a past president of the Society for Research on Nicotine and Tobacco, he also represented the World Bank at the first WHO Framework Convention on Tobacco Control (FCTC) negotiations.

In the paper, Warner and his co-authors present a number of policy options to strike a more sensible balance between the "valid concerns" about risks to youth and the smoking cessation benefits of non-combustible nicotine products.

This article has been taken from the website [snusforumet.se](http://snusforumet.se)

Established in 2018, ARI is an initiative aimed at filling gaps in research and advocacy on ending combustible smoking in a generation. Supported by the Foundation for A Smoke-Free World (FSFW), ARI established the Pakistan Alliance for Nicotine and Tobacco Harm Reduction (PANTHR) in 2019 to promote innovative solutions for smoking cessation.

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