



New Nicotine Alliance Ireland

Charity number 20204637

Thank you for this opportunity to comment on the proposed Amendment to the Tobacco and Related Products Order. We are a non-profit consumer advocacy organization representing the 200,000 e-cig users in Ireland and the smokers who would benefit from switching from combustible cigarettes to vastly less harmful vaping products.

The aim of this bill is to reduce the appeal of e-cigarettes among young people as there is a perception that a 'gateway' may exist leading to an increase in smoking at some unspecified time. However, this proposal is an overreaction to what appears to be a time-limited phenomenon. In the U.S. use of nicotine vaping products rose significantly from 2015 to 2019 while media coverage of the vaping epidemic was at its height. When other matters took the headlines, teen (middle + high school) nicotine vaping dropped 62% between 2019 and 2021 according to the @CDCgov National Youth Tobacco Survey. Consideration must be given to other means of reducing youth appeal that doesn't adversely affect current adult users.

This proposal will result in the complete elimination of vaping products from the market. The 16 listed flavors are insufficient to even craft a tolerable tobacco flavor and as such is a de facto ban on e-cigarettes in the Netherlands.

This action will not reduce smoking or reduce nicotine use instead is likely to induce a black market, a rise in smoking rates and several other foreseeable, if unintended consequences.

The proposed ban on all but 16 flavor additives is not based on any evidence (as shown by the original 23 flavors having to be whittled down to 16 due to 3 being known carcinogens and the rest already proven to be risky for inhalation.)

The Proposal is designed to only do one thing, reduce the value point of an alternative to smoking. This will protect the market position of combustible cigarettes. There is no evidence that it will achieve its

intended result of reducing youth uptake without a consequential increase in youth smoking.

The use of e-cigarettes has not caused an increase in smoking, in fact, the decline in smoking has accelerated as e-cigarettes have become common. Falling from 25.7% in 2014 to 20.6 % in 2021 in the Netherlands alone.

The proposal is justified by claims that vaping can lead to increased disease burden, this claim is vastly exaggerated and ignores the huge health burden of smoking which e-cigarettes replace.

Again, any reduction in the value point of e-cigs bolsters combustible cigarettes' position. We have clear evidence that a wide variety of flavored products is one of the main reasons e-cigarettes have competed successfully with combustible tobacco, Flavors are attractive to users and without them returning to (or choosing first) combustible cigarettes is highly probable.

We advocate for the benefits of harm-reduced options not because these products are good in themselves but because smoking is so harmful. While combustible cigarettes are available, safer alternatives such as e-cigarettes must be more available, more appealing, and more affordable. Anything which makes them less available appealing and affordable is an intentional imposition of harm. The consequences of which will be an increase in mortality and morbidity for the very people it propports to protect.