



Inquiry into the Use of Electronic Cigarettes and Personal Vaporisers in Australia

New Nicotine Alliance (UK)ⁱ is a consumer led national charity which aims to improve public health and reduce the toll of disease from smoking by improving understanding of reduced risk products such as e-cigarettes. We are writing to share the UK's positive experience with e-cigarettes with you and to urge you to introduce a proportionate regulatory approach in Australia, so as to enable e-cigarette use by adult smokers while minimising health risks.

The latest data from the Office of National Statistics in the UKⁱⁱ demonstrates a record drop in smoking prevalence in 2016 and the UK now has the second lowest smoking rate in Europe (after Sweden, where snus is the tobacco product of choice). For the first time, the figures show that the biggest drop is among younger adults, aged 18-29 years - smoking rates in that group have fallen by a quarter since 2010. E-cigarettes are widely available to adults in the UK and the ONS data shows that approximately 2.9 million people used e-cigarettes in 2016. Duncan Selbie, Chief Executive of Public Health England writes: "Although e-cigarette use increased more among young adults, smoking rates fell fastest in this age group. England is leading the world in maximising the benefits from e-cigarettes, while minimising the risks"ⁱⁱⁱ. Over half of e-cigarette users have stopped smoking cigarettes – this is a huge benefit to the health of the public.

We ask you to consider carefully the science relating to vaping and consider regulation in Australia in the light of emerging evidence of the potential positive impact on smokers' health – and on public health generally – of smokers switching from using combustible tobacco products to vaping. Public Health England has stated, on the basis of a review of numerous scientific studies, that vaping is 95% safer than smoking^{iv}, and this was supported by the Report from the Royal College of Physicians which concluded that: "Although it is not possible to precisely quantify the long term health risks associated with e-cigarettes, the available data suggest that they are unlikely to exceed 5% of those associated with smoked tobacco products, and may well be substantially lower than this figure".^v

We contend that appropriate and proportionate regulation of e-cigarettes should be based on what scientific evidence tells us and urge you to adopt the following:

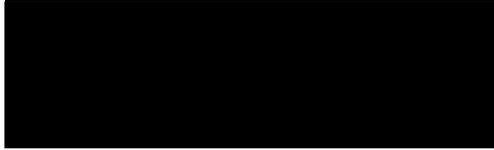
Make low concentrations of nicotine legal for vaping for tobacco harm reduction

For any nicotine user an e-cigarette product will be much less risky than continuing to smoke – that applies to pregnant smokers and adolescents too. The safety profile of nicotine has been well established through years of trials of nicotine replacement therapy, and more recently through the assessment of health risks from Swedish snus, which provides nicotine but without smoke. Nicotine is not a carcinogen, or a cause of cardiovascular disease. Though it is one of the addictive agents in cigarettes, there is no evidence of significant harm from nicotine use, per se^{vi}.

Classify nicotine and vaping devices as consumer products

There is no reason to regulate these products as something they are not – as tobacco products, poisons or medicines. They are consumer products and need light regulation to promote confidence in the quality of products and business practices of vendors. To regulate them as if they were cigarettes would be disproportionate to risk and highly discriminatory – in a way that will cause harm to health.

E-cigarettes can offer significant health benefits if the right regulatory balance is achieved. We urge you to embrace this exciting opportunity to drive down Australian smoking rates by developing sensible regulations for e-cigarettes, proportionate to the very low level of risk.



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ⁱ New Nicotine Alliance (UK) <https://nnalliance.org/>

ⁱⁱ Office for National Statistics (UK) **Adult Smoking Habits in Great Britain 2016**
<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/drugusealcoholandsmoking/datasets/adultsmokinghabitsingreatbritain>

ⁱⁱⁱ Selbie, D. **Our ambition for a Smokefree nation is in sight** Blog *Public Health England, Public Health Matters June 2017* <https://publichealthmatters.blog.gov.uk/2017/06/16/our-ambition-for-a-smokefree-nation-is-in-sight/>

^{iv} McNeill A, Brose LS, Calder R, Hitchman SC, Hajek P, McRobbie H **E-cigarettes: an evidence update** *Public Health England August 2015* <https://www.gov.uk/government/news/e-cigarettes-around-95-less-harmful-than-tobacco-estimates-landmark-review>

^v **Nicotine without smoke**, *Royal College of Physicians April 2016*
<https://www.rcplondon.ac.uk/file/3563/download?token=uVOROTwz>

^{vi} Farsalinos KE, Polosa R. **Safety evaluation and risk assessment of electronic cigarettes as tobacco cigarette substitutes: a systematic review** (Risk differences compared with conventional cigarettes and the issue of nicotine) *Therapeutic Advances in Drug Safety*, 2014