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Steve Barclay
Dept. of Health & Social Care
39 Victoria Street
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Subject: Health Select Committee meeting on Vaping

Dear Steve Barclay,

I am a consumer advocate, with no ties to industry at present (for full details see the APPG letter linked below).

I note that industry was present at this meeting but no one representing consumers of the product, why was this? As the people most likely to be impacted, why are we not included? I have further comments below and a suggestion to include at least one consumer org.

Vaping is less dependence forming than smoking, science says so. See: [https://safernicotine.wiki/mediawiki/index.php/ENDS_Public_Health#Dependence \(Addiction, Abuse\) vs Harm / Harm Reduction - Ecigs and Nicotine](https://safernicotine.wiki/mediawiki/index.php/ENDS_Public_Health#Dependence_(Addiction,_Abuse)_vs_Harm/_Harm_Reduction_-_Ecigs_and_Nicotine)

Youth brain harms are reversible and only found in rats. Human youth smokers never experienced such harms. A huge number of people smoked in the 60s-80s, many from a young age the population is huge, any effect would have been seen (yes, people have looked, negative research is rarely published, but nothing was found). I can however provide evidence in the form of quotes from experts in tobacco and nicotine, please feel free to request such information.

No UK legal vape delivers more nicotine than a cigarette, some of the illegal disposables do and are attractive to hardened smokers. Legal vapes should be allowed to use more than 20 mg/ml, see also my letter to APPG Vaping on the 28th Feb this year https://safernicotine.wiki/mediawiki/index.php/File:Email_to_appg_vaping_28th_Feb_2023.pdf. The US Juul product (containing 58 mg salt nicotine) produces blood plasma concentrations lower than a cigarette, but closer to the same level (This is why it worked so well in adults who smoke). Estimating that all nicotine is absorbed by the vaper by the amount exhaled is flawed, nicotine is destroyed by heating and oxidation while in the device and vapour. Cigarettes are delivering 1-2 mg per cigarette, but start out with 250 mg per pack of 20 (delivering only 20-40 mg to the user). Far better to stick with measured blood plasma levels in comparison to cigarettes, since this data is available. e.g. <https://pubmed.ncbi.nlm.nih.gov/33486526/>

I Agree with points on advertising to children, industry should not target the product at them, but targeting their smoking parents is absolutely going to save lives. Children must be told the truth, the product is not for them, but might mean they do not lose their parents to cancer. We know with absolute certainty that vaping is safer than smoking, there is no doubt; the only doubt is the magnitude of the difference (the lowest estimate 60% the highest 99.5%, current science says 95%+ and is climbing each year, as well as gaining certainty).

Was it necessary to brow-beat the industry representatives? They were asked if they targeted children, and responded that they did not, with good reasons for the answer, including that the owner of one business wanted to help existing smokers, as vaping helped him, not gain youth customers.

I have not seen legitimate businesses from the UK targeting underage users, that has been rife overseas traders, and some Chinese companies. Those selling genuinely child appealing products or advertising to youth on social media, where any influence can be had, since they are not UK based, then yes, they should be stopped as far as possible.



Taxation is not going to help, illicit markets will avoid the tax and make the environmental situation worse, as well a safety. The illicit market exploded in Australia with 90% of the 1.1 million vapers buying from the illicit market.

Flavours targeted at adults, including their memories of sweets available when they where young. Human flavour preference is done by age 2 approximately, targeting flavours at youth is not actually reasonable, humans like nice flavours. Please see: [https://safernicotine.wiki/mediawiki/index.php/ENDS_Cardiovascular_System#Flavors_\(Flavours\)](https://safernicotine.wiki/mediawiki/index.php/ENDS_Cardiovascular_System#Flavors_(Flavours))

The illicit market vapes are not regulated and may contain contaminants, this is not a surprise, and would suggest that regulation that works to reduce the illicit trade (not increase it) would be beneficial.

The loophole that allows giving vapes to kids (not selling them) is not used, no reputable company does this, or would do so. It is actually a complete non issue, since no one does it. I have never heard of this, and I asked and no one else has either. Please can you forward to me the data that shows this is happening, and where? As advocates we would like to know of problems, and if possible help, thanks for your assistance.

Popcorn lung is not caused by vaping see: https://safernicotine.wiki/mediawiki/index.php/ENDS_Flavors including the risk of inhaling flavours. No regulated UK product contains the chemical, it is banned. Another reason not to expand the black market, unregulated products would not be tested for banned flavours. That this was brought up, and seriously considered shows that the ministers failed to research the subject. You should include a purely user organisation such as the UK Charity NNA (New Nicotine Alliance) <https://nnaalliance.org/>, they have no industry affiliation and work for the users of the product. You might also consider INNCO (International Network Nicotine Consumer Organizations) <https://innco.org/>

As a user of these products; I would request MPs be better informed, before considering legislation that could impact my health, thank you!

If you want to price youngsters out of the market without detriment to adult smokers see the letter to APPG vaping mentioned above. It contains some ideas that would reduce waste 10 fold, and increase the initial outlay without increasing cost per puff, a win for the environment and adult smokers with less spending power.

Yours sincerely,

Richard Pruen

Cc: APPG-Vaping

P.S.

I await your reply with the requested information, including reasoning for not including representatives of consumers in the enquiry. I would also like to know if the MPs where briefed on vaping or the vaping industry, if so by whom?