

Hi Mark,

I am a consumer advocate for vaping, and do not use disposables beyond experimenting to see what they are like. I am also an engineer.

I have worked in the vaping industry previously testing against the standards for vaping products, and owned a now closed company BTC Battery Testing LTD (closed 2016).

Currently I care for my mother who suffers vascular dementia, and as such volunteer my spare time to the cause of THR.

The disposable vaping problem is not an easy one, because the product is in demand, a black market will form. A black market will be less regulated, even less concerned with the environment, and have no reuse or recycling plan, due to there being no incentives. Please see the situation in Australia if you have any doubts.

I would suggest the following rule changes to start. All disposable devices should be rechargeable, and either contain enough liquid to last the lifetime of the atomiser (roughly 15-20ml), or be required to have a fill method (there are many ways to do this, including community 'hacks' that are available on the internet). If a refilling method was designed in, the extra cost is minimal to include a bung or device to allow re-fill). This would mean the atomiser is used for it's lifetime, and the battery recharged and used for much longer. Waste reduction by 1/10 (assuming 2ml devices now, 10 such would be replaced by a single 20ml device)

My preferred solution is rechargeable and large capacity, for the following reasons. Large size, it becomes difficult to conceal a device with 20ml capacity, this will help reduce stealth use. As the lifetime is greater, plus content, the initial outlay will be higher putting the devices out of the purchasing power of youth, and doing so without adding to the cost per puff for the legitimate smoker wanting safer options.

Smaller re-fillable and rechargeable devices have many of the same advantages, but remain easy to hide, and lower price. That might be problematic.

This would depend on the lifting of the 2ml tank size, for a sealed for life device requiring tools to open, the 2 ml tank provides no protection to anyone. Even for refillable devices, in reality it increases fiddle and numbers of re-fills, and provides little protection (if any). Indeed it may be that the most dangerous time for ecigs is during filling, where child proof caps are removed etc, it might be argued that larger tanks would reduce risky refilling operations and be safer. At least a quick 'thought experiment' says that is quite possible and warrants further investigation.

I have further suggestions, and would be happy to help if you would like, this is simply a start.

I would imagine manufacturers will be reluctant to see rules that force them to be responsible about waste, disposables are highly profitable and allow walking away from disposal and environmental costs. This should be addressed however. As a consumer my thoughts are 'oh dear how very sad' but I am sure they will still manage to find a way to make a profit.

Thanks for your time

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