Richard A E D Pruen





Sir Keir Starmer MP 10 Downing Street London SW1A 2AA

Subject: The ban on disposable cigarettes / vaping in general Dear Prime Minister,

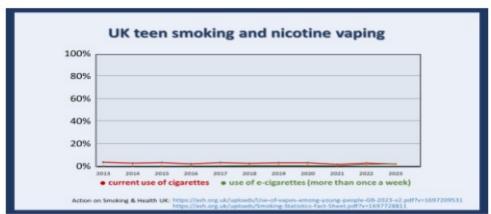
I am a consumer advocate for vaping (15 years and a vaper for 16), and I do not use disposables beyond experimenting to see what they are like. I am also an engineer. I have previously worked in the vaping industry, testing against the standards for vaping products, and owned a now-closed company, BTC Battery Testing LTD (closed 2016). I am a consumer now and take no money from any industry, charity, or government scheme. Currently, I care for my mother, who suffers from vascular dementia, and as such, I volunteer my spare time to the cause of THR. I also advocate for smoking cessation in sufferers of severe mental health conditions. ASH UK funds the group, but I do not take any payment for my time.

Regarding the subject. Might I remind you that Australia has already taken this path? An effective ban, over 80 fire bombings, at least three gang-style murders, and a rampant illegal trade have resulted? It simply won't work. The prohibitionist faction has played on children starting using these products, and may have convinced you that a ban is enforceable; sadly, if Australia cannot do it, the proximity of Europe means less chance here. I am simply being realistic. The best, perhaps only, way to control the illicit trade is to make sure there is a legal trade that makes it less profitable; the US abandoned alcohol prohibition in favour of this.

Please, however, remain focused on preventing harm; having the only source of disposable vapes (sorry to say this, but it is true) that adolescents could buy, being from a 'dealer' who might supply other illicit substances, is not safer! At least if they are from a shop selling tested, safe devices, then that is a vast reduction in harm already, avoiding interaction with drug dealers. I prefer every shop to follow the law, but as we know, not everyone will. Adolescents might also sample smoking, especially if they sensibly avoid illicit substance dealers; this, too, is not exactly a win, smoking being deadly and carcinogenic. Those diverted from cigarettes face a much lower risk of cancer and other smoking-related diseases. It is a fact that zero deaths have been caused by vaping a regulated nicotine product; among around 82 million users worldwide, the EVALI deaths all resulted from an illegal trade in THC vaping in the US (different chemistry and devices, incompatible with nicotine vapes).

I favour regulations to encourage the use of rechargeable vapes. However, even disposables can be recycled; these are far superior to cigarette filters; filter tips are nearly impossible to recycle and will be in the environment for years. Exceptions should be made for disabled people (unable to fill or use pods) in secure mental health care/prisons; here, disposable tamper-resistant devices are safer. However, legislation should favour the refillable and reusable vapes that are most environmentally sound; disposables can be discouraged without a ban.

Please see the graph. So far, regular use is not high and may be displacing cigarettes. Sensible regulations to keep it that way would be welcome.





A few truths to bear in mind:

The use of the word 'children' is a deliberate tactic to tug on heart strings, more correctly teens particularly adolescents are at risk from experimenting with vapes and other adult things, harm reduction still applies, beer is safer than vodka, vapes are vastly safer than cigarettes.

Infrequent trial use isn't the best indicator of dependence (once in 30 days), better is once a week or more. To risk dependence you need to be regularly vaping. The harm from vaping is low enough it is right to argue against the use of addiction, since the DSM-5 definition requires significant harm, dependence is more correct because it can be hard to stop. Vaping allows users to taper nicotine so less than cigarettes.

Millions of lives are at stake, billions of pounds the NHS spend on cancer and other smoking related treatments that could be eliminated, smoking is the leading cause of preventable death, vaping regulated nicotine products, zero deaths in 20 years.

The less popular you make vaping, the more popular smoking will become, they are substitutes. When you ban things; illicit markets form, they have no reason to follow age of sale or other rules, this risks making things worse not better (Australia demonstrates this).

The generational ban while it sounds good, kicks the can into the future, vaping is reducing smoking right now, and more effort is required to target older adults, they are the ones facing smoking related diseases imminently, switching them to vapes is a huge immediate benefit the generational ban could never deliver.

I would like to hear your thoughts, I will be happy to provide evidence to support what I have said, if required for any point please let me know. You promised your government would work for us, and would look after our health and well-being, here is a way to prove you will listen, many lives can be saved. If there is one single study I think most important: Comparison of biomarkers of exposure among US adult smokers, users of electronic nicotine delivery systems, dual users and nonusers, 2018–2019. For every harmful or potentially harmful compound, vapers look exactly like non-users.

Thank you for your time, I have tried to be brief as you must be busy, but welcome questions should you have any.

Yours sincerely,

Richard Pruen

P.S. My story: Why I do this? I started vaping in 2008 when it was relatively new, I had at this point given up trying to stop smoking, having tried everything. I intended to vape where I was unable to smoke. To my surprise in March of 2009 I discovered I had money budgeted for cigarettes that was unspent, this was how I discovered I had accidentally given up smoking. In 2010 I watched my father die from cancer, smoking 20/day didn't help, although as a firefighter there is occupational risk also. My health improved substantially over the first 5 years, and at 15 years vaping I had an MRI due to aortic aneurysms running in the family (my father had one repaired), my lungs where those of a non smoker, doctors where unable to find any sign I vape.

Put simply vaping saved my life and I would like pass that forward, partly in memory of my father, he was a firefighter and lived to save lives.