

Response ID ANON-GC1H-5H1M-X

Submitted to Proposal to clarify how nicotine levels for vaping products are expressed in the Smokefree Environments and Regulated Products Regulations 2021

Submitted on 2023-06-14 23:07:05

Your details

1 What is your name?

Name:

Richard Pruen

2 What is your email address?

Email:

richard@pruen.co.uk

3 Are you submitting on behalf of an organisation?

Yes

If so, what is your organisation?:

Safer Nicotine wiki

4 What ethnicity/ethnicities do you identify with?

Other European, Not applicable (eg, I'm submitting of behalf of an organisation or group)

5 What lwi do you affiliate to?

What lwi do you affiliate to?:

6 I am, or I represent, the following category or categories (select all that apply)

Other (please specify)

Other:

Citizen science project (wikipedia clone on tobacco harm reduction)

Proposal questions

7 Do you agree with our proposal to set the maximum allowable nicotine concentration at 28.5mg/mL for reusable vaping products that contain nicotine salts?

No

8 Please explain your reasoning.

If No, please explain.:

Based on the available science, the limit should be set at a level that provides protection from poisoning, while allowing sufficient for a heavy smoker to DIY mix liquid that will satisfy their needs.

Having reviewed the recent science, it is only nicotine concentrations at or above 100mg/ml that have resulted in very few fatal poisonings with orally ingested nicotine. Concentrations below 80mg/ml have as far as can be found, never resulted in death or serious harm.

Therefore a limit of 75mg/ml would provide protection from poisoning while being high enough to allow DIY mixing of liquid to suit a low-power pod vaping device, which would satisfy even a heavy smoker.

This provides maximum safety in that 75mg/ml will cause the body to vomit before damaging amounts of nicotine can be ingested. Even suicide attempts by simply drinking the liquid would fail. Yet allows even heavy smokers to obtain sufficient nicotine, and thus switch more easily to a vastly safer product.

9 Is there anything else you would like to tell us at this time?

Is there anything else you would like to tell us at this time?:

Issues have been found with the UK limit of 20mg/ml, heavy smokers find switching difficult, this requires the use of a nicotine patch and vaping, which significantly increases friction to switching, this costs the lives of smokers who would otherwise stop smoking.

The UK 20mg limit was based on poor science (an estimated LD50 based on one scientist's self-administration of nicotine IV) and the assumption that all the ingested nicotine would be instantly absorbed. Looking at real data and better LD50 data gives a better understanding.

Declarations and privacy

10 Publishing submissions

You may publish this submission

11 Do you have commercial interests?

I do not have any commercial interests in smoked tobacco or other regulated products (vaping products, other notifiable products)

12 Commercially sensitive information

This submission does not contain commercially sensitive information

13 Protection from commercial and other vested interests of the tobacco industry

Please provide details of any tobacco company links or vested interests below.:

No links to any industry, government, or commercial interest of any kind, and no funding from any tobacco or vaping industry nor taxes or fees collected from tobacco or other companies. All funding is from the individual volunteers who contribute to the project.