



Dear ladies and gentlemen,

As a consumer organization representing tens of thousands of vapers worldwide, we appreciate the opportunity to provide feedback on the proposed amendment to the tobacco control act.

Flavour bans and plain packaging endanger the progress seen in Norway over the past years. Flavours are essential for smokers to switch from deadly cigarettes to a 95% less harmful alternative - vaping. Scientific evidence and the experience of more than 80 million consumers worldwide show that flavour bans would harm public health.

Additionally, many current smokers are misinformed about the actual low-risk profile of vaping and, therefore, hesitant to switch even though they could minimize their health risks. Misunderstandings and misconceptions about harm reduction from vaping are already widespread. Incorrect risk assessments of e-cigarettes prevent millions of smokers from switching to this 95% less harmful alternative. This is a public health catastrophe.

Further restrictions, such as plain packaging of e-cigarettes, will deprive smokers of the opportunity to learn about less harmful alternatives. There is a risk that equating vaping with cigarettes will reinforce the impression that they have the same health consequences.

Scientific evidence:

Are vaping flavours harmful?

No. According to the [EU's SCHEER report](#): "To date, there is no specific data that specific flavourings used in the EU pose health risks for electronic cigarette users following repeated Exposure."

Are flavours used just for teenagers?

Although flavours use is more often reported in younger age groups, flavours are not just for young users, and they are definitely not targeted to underage people.

Different studies show that flavours are [commonly used among regular vapers of all age groups](#). In the United States and Canada, it is estimated that around [two thirds of adult vapers use flavours](#). In Europe, the latest [Eurobarometer on the Attitudes of Europeans towards tobacco and electronic cigarettes](#) shows that, among those who vape at least on a monthly basis, almost half (48%) use fruity flavours, and 20% use candy flavours. Another recent [study](#) found that "only 2.1% reported tobacco as the single most often used" flavour.



Moreover, [differences in flavours use among age groups are small](#). In the United States, for example, the percentage of those who used flavoured e-cigarettes was 89.6% for adults aged 18-24 years, 86.7% for those aged 25-34 years, 76.0% for those aged 35-44 years 60.4% for those aged 45 years and older, meaning that flavours are used by the vast majority of users in all age groups.

A [study](#) found that “relative to vaping tobacco flavours, vaping non-tobacco-flavoured e-cigarettes was not associated with increased youth smoking initiation”.

What role do flavours play in smoking cessation?

Flavours do not only increase attractiveness for adults, but they are also essential for smokers trying to quit. According to Dr. [Collin Mendelsohn](#), by not reminding vapers of the taste of tobacco, flavours are more likely to keep people off traditional cigarettes: “Flavours are an important part of the appeal of vaping for adult smokers and make the products attractive as an alternative to smoking, just as flavours are also used to enhance the appeal of nicotine gum. Banning flavours would likely undermine the use of e-cigarettes and the public health benefits.”

Vaping flavours are not only instrumental in helping smokers switch, but also ensure that they do not take up cigarettes again. According to Yale School of Public Health, flavoured vaping devices are associated with an [230% increase in the odds of adult smoking cessation](#).

[Friedman, A.S. et al \(2020\)](#) found that “Adults who vaped flavoured e-cigarettes were more likely to subsequently quit smoking than those who used unflavored e-cigarettes” and “adults who began vaping non-tobacco-flavoured e-cigarettes were more likely to quit smoking than those who vaped tobacco flavours”.

When banned, the University of Waterloo found that [5 out of 10 of vapers would turn to illegal sources to buy flavoured devices or would go back to smoking cigarettes](#). Flavour bans run the risk of increasing tobacco consumption and cancer incidence by limiting smoking cessation and forcing vapers back to smoking cigarettes. Legislation on vaping flavours must take this fact into account, and we urge legislators against the widespread implementation of such bans.

Are flavours the cause of a youth vaping and smoking epidemic?

No. There is no evidence linking vaping flavours with teenage or underage smoking, while many studies show how other socio-economic and environmental factors are behind children taking up vaping or cigarettes. Factors such as [personality traits](#), [genetic predisposition](#), parental smoking habits, and household income must be considered when determining why



teenagers vape or smoke. The problem is most studies only account for a few shared risk factors. An in-depth analysis can be found [here](#).

A [study](#) conducted by Kevin Tan, Jordan P. Davis, Douglas C. Smith & Wang Yang in 2020 found that adolescents who were less satisfied with their life, in general, were more likely to seek risky experiences and have a higher tendency to use illicit substances regularly. As such, e-cigarettes are not a gateway for smoking, but rather bad circumstances in teenagers' lives lead to various risky behaviours. The same study found that vaping appears to divert a subset of youth at high risk of cigarette smoking away from smoking.

A [review of fifteen studies](#) published in 2019 stated that “a true gateway effect in youths has not yet been demonstrated.” According to researchers from the University of New South Wales, Sydney and the University of Queensland, Herston, [at least 70-85% of all adolescents try vaping after having already started smoking](#), and regular vaping is very rare (below 0,5%) among teenagers who are non-smokers.

Another [study](#) found that “relative to vaping tobacco flavours, vaping non-tobacco-flavoured e-cigarettes was not associated with increased youth smoking initiation but was associated with an increase in the odds of adult smoking cessation”.

Moreover, there is evidence that youth [vaping](#) and [smoking](#) have decreased rapidly in the last years: “the use of cigarettes and smokeless tobacco decreased more rapidly since 2012 as e-cigarette use began to increase. Smoking and smokeless tobacco use reached historically low levels among adolescents in the US”. Similar evidence can be found in [Germany](#), while in the [UK](#) “youth smoking rates are at an all-time low and youth (11-18 year-old) use of e-cigarettes is rare and largely confined to those that already smoke tobacco cigarettes”.

[Professor Polosa](#), in a study published in 2020, summarises the pattern of youth use of vaping as: “EC use has surged greatly among high school students and young adults over the last decade but fortunately has declined significantly since its peak in 2019. During the same time period, smoking rates have constantly fallen to new low record levels. These trends argue against EC use as a gateway to smoking. Most EC usage is infrequent and unlikely to increase a person's risk of negative health consequences. Furthermore, the majority of EC usage has happened among those who have previously smoked”.

Can flavour bans improve public health?

There is strong evidence showing that prohibition does not work and that banning flavours will disproportionately hit consumers trying to quit and goes against the goals of any public health authority.

The literature suggests that banning vaping flavours will drive users to the black market or back to smoking, something that has been verified by previous experiences. A [flavour ban in](#)



[San Francisco](#) resulted in rising smoking rates among teenagers for the first time in decades, while a [flavour ban in Massachusetts](#) resulted in higher sales of cigarettes.

A closer and more recent example is that of [Estonia](#). Estonia banned flavours in 2020, and the result was that 60% of vapers kept using them by mixing their own liquids or obtaining them from the black market without any quality or safety control.

As a result, we expect flavour bans to drive most users to the black market, where products do not comply with any safety regulation and can be harmful to health. Other users will be forced back to smoking cigarettes, thereby increasing smoking and cancer incidence and damaging public health. But the ban will in no case reduce youth vaping. If it was just about the taste, nobody would have ever started smoking. The taste and smell of ash, smoke and death didn't deter young people in the past - so neither will a flavour ban.

Bans would be an easy step for politicians, but not a solution to the problem. As we mentioned, young people who are unhappy with their lives tend to do more risky things in general. Factors such as anxiety, parental smoking habits, peer attitudes, poor schools, and household income must be considered in turn. So, suppose politicians and anti-vaping groups really want to help teens: they should campaign for better schools, healthcare systems and economic conditions for their parents to make ends meet (or admit that it is not about young people but just an excuse to ban vaping for everybody).