



## **Public submission from the World Vapers' Alliance to the Slovenian Ministry of Health**

### **About the World Vapers' Alliance**

The World Vapers' Alliance (WVA) amplifies the voices of vapers around the world and empowers them to make a difference for their communities. Our members are vapers associations as well as individual vapers from all over the world. More information can be found on [www.worldvapersalliance.com](http://www.worldvapersalliance.com)

### **About this consultation and why the World Vapers' Alliance is responding to it**

The proposed regulation, along with the Strategic Action Plan adopted last December by the Slovenian Ministry of Health, includes several measures that can lead Slovenia to a public health catastrophe.

The recently announced [proposal to amend and supplement the Act on Restricting the Use of Tobacco and Related Products](#) aims to introduce a ban on all e-cigarette flavorings except tobacco "to prevent and reduce the use of electronic cigarettes among young people, among whom the use of electronic cigarettes has been increasing in recent years". According to the Slovenian authorities "more and more research also shows that, among adolescents who otherwise do not smoke, the use of an electronic cigarette significantly increases the likelihood that they will also start smoking regular cigarettes".

The scientific evidence available shows that the previous statements made by the Slovenian Public Health authorities on vaping flavours are wrong. Research conducted on vaping flavours has proved that they are commonly used by adults and constitute a key element in helping smokers switch, while there is no evidence linking flavours with teenage or underage vaping or smoking. Meanwhile, the proposed ban on vaping flavours risks forcing thousands of ex-smokers who quit thanks to vaping back to smoking, and it makes it more difficult for current smokers to switch to this 95% less harmful alternative in the future.

The World Vapers' Alliance, therefore participates in this consultation and submits this document to the Slovenian Ministry of Health to provide extensive scientific evidence on vaping flavours and to explain how a flavour ban would hurt public health.

### **How to read this document:**

The left side of the table contains the direct citation from the Slovenian Ministry of Health regulation proposal, including page and line numbers. The WVA response on each selected paragraph, including links to academic studies and articles, is available on the left.

Topic	Reference	Slovenian Ministry of Health proposal	World Vapers' Alliance response
<p>How harmful is vaping?</p>	<p>Page 5</p>	<p>The number, quantity and characteristics of other substances to which the EC user is exposed are also very diverse and depend on the characteristics of the product, the liquid and the method of use. With typical EC use, the exposure to these substances is mostly significantly lower than when smoking conventional cigarettes, but it is currently not possible to estimate how much the potential reduction in health risk is.</p> <p>The effects of long-term use of EC have not yet been studied, but potential harmful effects can be inferred based on the chemical substances present in the aerosol and the results of numerous studies that show changes in the tissues of various organs due to the use of EC. (...) But we know the short-term effects on health, which include, in addition to mouth and throat irritation, cough, nausea, headache, and nicotine addiction, epileptic seizures and lung damage. In 2019, several thousand people, mainly young people, fell ill in the USA due to acute lung injuries related to the use of EC, and many deaths and severe consequences for respiratory health were also recorded. One component of the EC fluids was the cause of most of these cases, but not all cases.</p>	<p>According to Public Health England, vaping is <a href="#">95% less harmful</a> than smoking. King's College London, after doing the <a href="#">largest literature review of its kind</a>, reconfirmed this evidence: "The use of vaping products rather than smoking leads to a substantial reduction in exposure to toxicants that promote cancer, lung disease and cardiovascular disease". Dr Debbie Robson, one of the report's authors, stated: "The levels of exposure to cancer-causing and other toxicants are drastically lower in people who vape compared with those who smoke".</p> <p>Dr. William E Stephens of St. Andrews University also showed that the risk of cancer from e-cigarettes compared to that from smoking is <a href="#">less than half a percent</a>, and a similar study concluded that vaping possesses "<a href="#">substantially reduced toxicity</a>" compared to smoking.</p> <p>The vast amount of evidence supporting this view led the <a href="#">Royal College of Physicians</a> to affirm that "e-cigarettes can in principle deliver a high dose of nicotine, in the absence of the vast majority of the harmful constituents of tobacco smoke [...]". Additional evidence of health improvements in smokers switching to vaping supports this idea. Professor Jacob George (University of Dundee) found that smokers who switch to vaping "demonstrate <a href="#">significant improvement in vascular health</a>". A similar study found that "e-cigarettes offer <a href="#">similar vascular health benefits</a> to that of NRT".</p>

<p>How harmful is nicotine ?</p>	<p>Page 5</p>	<p>The use of products with nicotine is associated with significant risks, especially for adolescents and also for young adults.</p>	<p>The <a href="#">British National Health Service</a> stated that "while nicotine is the addictive substance in cigarettes, it's relatively harmless. Almost all of the harm from smoking comes from the thousands of other chemicals in tobacco smoke, many of which are toxic." Similarly, the <a href="#">Yorkshire Cancer Research</a> confirmed: "Nicotine is not the cause of death from smoking. Nicotine is not a carcinogen; there is no evidence that sustained use of nicotine alone increases the risk of cancer. Of the three main causes of death from smoking (lung cancer, Chronic Obstructive Pulmonary Disease and cardiovascular disease), none are caused by nicotine. The harm from smoking comes from the thousands of other chemicals in tobacco smoke". <a href="#">Niaura et al.</a> also found that "most of the physiological harm attributable to cigarette smoking derives from the toxicants in tobacco and combustion products. Preventable morbidity and mortality have overwhelmingly been related to combusted tobacco smoking, not to nicotine itself".</p> <p>A recent <a href="#">study</a> found that nicotine is an important factor in whether smokers are able to switch: "[Vaping] with nicotine delivery approaching that of a cigarette is more effective in helping ambivalent smokers to quit cigarette smoking."</p> <p>"Smokers who switch to vaping improve their health no matter if they keep consuming nicotine or not", stated Professor Jacob George in another <a href="#">study</a>.</p>
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<p><b>Are flavours dangerous?</b></p>	<p><b>Page 6</b></p>	<p>The presence of flavorings in EC liquids is of concern, as they have not been adequately studied for their toxic and irritant potential and for triggering hypersensitivity reactions.</p>	<p>According to <a href="#">EU's SCHEER report</a>, "To date, there is no specific data that specific flavourings used in the EU pose health risks for electronic cigarette users following repeated exposure."</p>
<p><b>Flavours usage by teenagers</b></p>	<p><b>Page 4</b></p>	<p>Flavors play a key role in the perception and use of EC, especially among adolescents and young adults. The use of EC with flavorings is more common in younger age groups, especially among adolescents, but also young adults. One of the most important reasons for the use of EC among adolescents is also the wide choice/availability of various aromas.</p>	<p>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.</p> <p>Different studies show that flavours are <a href="#">commonly used among regular vapers of all age groups</a>. In the United States and Canada, it is estimated that around two-thirds of <a href="#">adult vapers use flavours</a>. In Europe, the latest <a href="#">Eurobarometer on the Attitudes of Europeans towards tobacco and electronic cigarettes</a> shows that, among those who vape at least on a monthly basis, almost half (48%) use fruity flavours, and 20% use candy flavours.</p> <p>Moreover, <a href="#">differences in flavours use among age groups are small</a>. 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.</p> <p>A <a href="#">study</a> found that "relative to vaping tobacco flavours, vaping non-tobacco-flavored e-cigarettes was not associated with increased youth smoking initiation".</p>
	<p><b>Page 4</b></p>	<p>Flavors in EC influence EC use among adolescents and young adults. They are associated with greater willingness to try EC. They are also associated with the onset of EC use, especially sweet and fruity aromas.</p>	

<b>The role of flav ours in smo king cessa tio n</b>	<b>Page 4</b>	The prohibition of aromas in the EC is justified by the following: Flavorings in ECs are associated with increased EC attractiveness, decreased perceptions of their harmfulness (...).	<p>As the proposal itself recognizes, "flavors are associated with increased attractiveness, reduce the unpleasant effects of nicotine and are associated with greater willingness to try EC", and "the possibility of choosing between different aromas is especially important for users", while "an unpleasant aroma may be a reason to discontinue use".</p> <p>Flavours do not only increase attractiveness, but they are also essential for adult smokers trying to quit. Flavours help smokers forget the taste and smell of cigarettes.</p> <p>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 <a href="#">230% increase in the odds of adult smoking cessation</a>. When banned, the University of Waterloo found that <a href="#">almost half of vapers would turn to illegal sources to buy flavoured devices or would go back to smoking cigarettes</a>. 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.</p>
	<b>Page 1</b>	The data show that attractive aromas in electronic cigarettes are associated with an increase in the attractiveness of electronic cigarettes and a decrease in the perception of their harm.	
	<b>Page 4</b>	Non-tobacco flavors in general make EC use more attractive and give a false sense of security. Flavors, other than tobacco, also reduce the unpleasant effects of nicotine when inhaling the aerosol (sharpness, bitterness) and thus further increase the attractiveness of these products.	
	<b>Page 4</b>	Flavors in EC influence EC use among adolescents and young adults. They are associated with greater willingness to try EC. They are also associated with the onset of EC use, especially sweet and fruity aromas	
	<b>Page 4</b>	Aromas are an important factor in the choice of EC, it seems that the possibility of choosing between different aromas is especially important for users. Among young people as well as adults, but especially young people, aromas are the most common or one of the most common reasons for trying, starting and using EC. An unpleasant aroma may be a reason to discontinue use.	

<p><b>Are flavours driving youth vaping and smoking ?</b></p>	<p><b>Page 1</b></p>	<p>More and more research also shows that, among adolescents who otherwise do not smoke, the use of an electronic cigarette significantly increases the likelihood that they will also start smoking regular cigarettes.</p>	<p>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 <a href="#">personality traits</a>, <a href="#">genetic predisposition</a>, parental smoking habits, and household income must be considered when determining why teenagers vape or smoke.</p> <p>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.</p> <p>A <a href="#">study</a> found that “relative to vaping tobacco flavours, vaping non-tobacco-flavored e-cigarettes was not associated with increased youth smoking initiation but was associated with an increase in the odds of adult smoking cessation”.</p> <p>Moreover, there is evidence that youth <a href="#">vaping</a> and <a href="#">smoking</a> have decreased rapidly in the last years, with <a href="#">youth smoking rates being at an all-time low</a>. <a href="#">Professor Polosa</a> summarizes 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”.</p>
	<p><b>Page 4</b></p>	<p>Flavorings in Ecs are associated with (...) initiation and continuation of EC use among adolescents and young adults.</p>	
	<p><b>Page 5</b></p>	<p>EC use exposes an adolescent or young adult to significant amounts of harmful substances and addictive nicotine, including many adolescents who would otherwise never use nicotine products.</p>	
	<p><b>Page 6</b></p>	<p>EC use among adolescents and young adults who have never smoked cigarettes increases the risk of cigarette smoking</p>	

<p>The potential consequences of a ban on flavours</p>	<p>Page 2</p>	<p>By banning attractive aromas in electronic cigarettes, we want to prevent and reduce the use of electronic cigarettes among young people, among whom the use of electronic cigarettes has been increasing in recent years.</p>	<p>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.</p> <p>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 <a href="#">flavour ban in San Francisco</a> resulted in rising smoking rates among teenagers for the first time in decades, while a <a href="#">flavour ban in Massachusetts</a> resulted in higher sales of cigarettes.</p> <p>A closer and more recent example is that of <a href="#">Estonia</a>. 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.</p> <p>As a result, we expect the flavour ban to drive most users to the black market, where products do not comply with any safety regulations 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.</p>
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