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Subject: Banning flavours will lead to more smoking
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Dear ENVI committee member,

Please find attached a one page briefing paper that very clearly sets out why our client, Totally Wicked Ltd, concludes that banning flavours in the context of electronic cigarettes will only lead to more people smoking tobacco cigarettes.

We hope that you will take the time to read this short briefing.

If you have any questions please do not hesitate to contact us.

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Banning flavours will lead to more smoking

It is a good objective to reduce the number of young people starting to smoke. One of the ways that the Commission and MEPs hope to achieve this is by banning flavourings, but where is the evidence that this will work? More importantly where is the evidence that flavourings actually attract young people to trying or using e-cigarettes?

The key health benefit of e-cigarettes is determined by how many smokers switch to them or use them as a staging post to quitting completely. This means that e-cigarettes have to be an attractive alternative to tobacco cigarettes for established smokers. Flavouring is an important part of this as the nicotine solutions have no flavour. This proposal would actually reduce the appeal of e-cigarettes to smokers.

“For many (a ban on flavourings) it could be disastrous – they’ve moved away from “ciggie” flavours onto any one of dozens, in some cases, or, in many cases, they switch flavours during the day to suit their moods... This, apparently, is to get away from their taste buds becoming used to one flavour, so that every change makes it a “fresh” experience and helps them avoid going back to fags. It’s not something that bothers me, particularly, but I do know that for a very large proportion of folks, it’s a vital part of the e-cig experience. Without it, going back to cigs isn’t too much of a stretch. Folks are worried about it. The thing about e-cigs is that they’re customisable in terms of flavour, nicotine strength, diluent (and therefore vapour density) and temperature – so anyone, given the chance, can sort out for themselves something that gives them a much more attractive experience in comparison with cigarettes, the consequences of which are pretty obvious, really.”

David Dorn, E-cigarette user and commentator

The proliferation of flavours reinforces that view that these are recreational consumer products, not smoking cessation aids or medicines.

The proposed removal of all flavourings is aimed at making e-cigarettes less appealing to non-smokers and in particular younger people. However research, including a recent survey commissioned by ASH¹, has shown time and time again that e-cigarettes are not attractive to young people, and are therefore not used as a gateway to smoking cigarettes. Although awareness of e-cigarettes was widespread amongst young people aged 11 to 18, the ASH survey found no evidence that young people either used or perceived e-cigarettes as being a gateway to smoking.

Evidence produced by a variety of organisation including ASH and the American Cancer Society (ACS) clearly shows that **flavours do not entice non-smokers to use e-cigarettes**, especially the young, as they have no interest in the product.

Researchers from the ACS² looked specifically into the enticement of flavours. They found that flavours did not increase the attractiveness of e-cigarettes to teenagers. Rather, **“Even after controlling for other statistically significant correlates, the odds of a smoker being willing to try an e-cigarette were 10 times those of a non-smoker.”**

If MEPs wish to ban flavourings they must be able to demonstrate the negative effect flavourings have; to date they have been unable to do so. Removing flavourings risks driving existing e-cigarette users back to tobacco cigarettes and limiting the positive discrimination between conventional cigarettes and e-cigarettes, which is a significant factor in encouraging smokers to transfer their usage to safer e-cigarettes. Research produced by the Consumer Advocates for Smoke Free Alternatives Association³ found that just under two thirds of e-cigarette users would return to smoking cigarettes if the electronic version was made harder to get or was altered in some way such as through the banning of flavours.

This document was produced by Totally Wicked Ltd, Stancliffe Street, Blackburn, BB2 2QR

¹ ASH surveyed 12,597 adults in 2010 – the questions focused on e-cigarette use and awareness in Great Britain. The preliminary survey was followed up by an additional study of adult smokers and non-smokers in February 2012 and more recently in 2013. ASH also surveyed children and young people aged 11 to 18 in March 2013.

² [http://www.jahonline.org/article/S1054-139X\(12\)00409-0/fulltext](http://www.jahonline.org/article/S1054-139X(12)00409-0/fulltext)

³ http://casaa.org/uploads/8_Biggest_Electronic_Cigarette_Myths.pdf