

Dear Mr. Deleanu,

We understand Mr. Paslaru has raised three questions related to the use of flavourings in tobacco products after a meeting with one of my members.

I hope the information below offers enough clarity to you and Mr. Paslaru. Please feel free to contact me if you have any further questions.

Kind regards
Maurits Bruggink



Address: Rue Montoyer, 10
B-1000 Bruxelles

EU Transparency Register:
1496873833-97

Maurits Bruggink
Secretary General

Tel. +32 2 319 27 67
M. +32 471 064786

mb@tobacco-europe.eu
www.tobacco-europe.eu

This e-mail may contain confidential and/or privileged information. If you are not the intended recipient (or have received this e-mail in error) please notify the sender immediately and delete this e-mail and all its attachments. Any unauthorized copying, disclosure or distribution of the material in this e-mail is forbidden.

1) Electronic cigarettes and other new nicotine products can reduce the risk to smoking

E-cigarettes are fundamentally different from combustible tobacco products as they do not burn tobacco. They are battery-powered devices that heat e-liquids to create a vapour which is inhaled by the user. They deliver nicotine and flavour in the form of an aerosol.

Modern oral products, including nicotine pouches do not contain tobacco and are consumed by placing the product under the lip or cheek so that nicotine can be absorbed by the body. Pouches usually contain nicotine, flavouring and sweeteners.

Tobacco heating products (THPs) are tobacco products that heat tobacco without combusting it and deliver aerosol containing nicotine.

All of these products have in common that they are not combusted and as such they release substantially less harmful substances than cigarettes. According to Public Health England in 2020, vaping is 95% less harmful than smoking.

2) Flavours are a crucial component of reduced risk products

Flavours help adult smokers quit smoking.

A growing body of international scientific research shows that flavours play a crucial role retaining adult smokers in vaping category and THPs, contributing to tobacco harm reduction and declining smoking rates.

The 2020 Eurobarometer survey shows that 58% of European smokers or ex-smokers who use, or have used, e-cigarettes, THPs or any similar products say that these products have helped them to either quit or reduce smoking.

The Eurobarometer survey shows that 64 % of vapers use flavours other than the traditional tobacco flavour. A flavour ban would therefore be detrimental to the success rate of persuading smokers to switch to alternatives such as e-cigarettes in order to reduce or stop their tobacco consumption.

Several scientists also support the use of flavours in reduced risk products:

According to a recently published study, the San Francisco vape flavour ban **doubled** high school students' probability of smoking conventional cigarettes. The California city saw a **30 percent increase** in underage use of cigarettes for the first time in more than a decade, while other cities across the country continue to see declining rates ((*Friedman et al. 2021, Journal of American Medical Association-- Pediatrics*).

A scientific study by the Yale School of Public Health, USA, shows that vaping flavoured e-cigarettes is associated with an increase in the odds of adult smoking cessation.

An evidence review commissioned by Public Health England and published in March 2020 reported that: "*Vapers said that banning flavoured liquids would deter them from using vaping products to help them quit or reduce their smoking. It could also push current vapers towards illicit products... A ban on flavoured liquids could have adverse*

Much of the scientific work is focused on vaping, being the most widely available reduced risk product. At the same time, the conclusions would also apply to other reduced risk, non-combustible products like nicotine pouches.

E-cigarettes, THPs, nicotine pouches and other new products are a gateway away from, not towards smoking

While flavours are a crucial component for smokers and ex-smokers, they convey very little interest from non-smokers.

The 2020 Eurobarometer report indicates that over 90% of non-smokers have not even tried e-cigarettes. The study also indicates that the overwhelming majority (90%) of respondents who have never used e-cigarettes or have only tried them once or twice say they do not find these products appealing. Whereas there are some minor differences in between age groups, each age group scores 87% or higher.

Similar results have been stated in the forementioned report for THPs, less than one in ten (6%) of respondents who have never used heated tobacco products or have only tried them once or twice find heated tobacco products appealing.

These results could indicate that e-cigarettes (and other reduced risk alternatives) are not a gateway to smoking, neither for adults nor for youth.

- 3) Prohibiting flavours in reduced risk products pushes former smokers back to cigarettes

Banning flavours dramatically reduce, even prohibit, new products' users access to their preferred flavoured products and would as a result undermine their impact on tobacco harm reduction. In addition to return to smoking combustible cigarettes, former smokers may also decide to use illicit products with flavourings, which constitutes an obvious health risk.