



## 2020 General Election Manifesto January 22, 2020

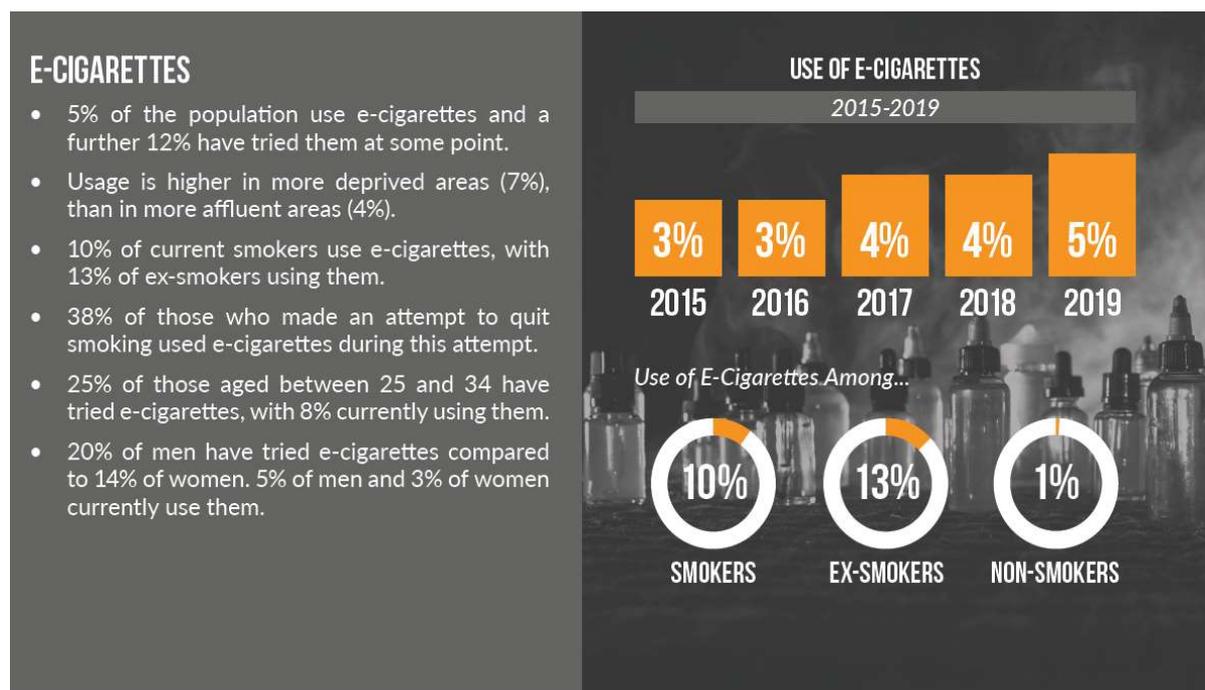
## Introduction

Smoking is the leading cause of preventable death in Ireland with almost 6,000 smokers dying each year from smoking related diseases. [1] Smoking is the single biggest cause of cancer, causing one third of all cancers. [2] In Europe, smoking causes an estimated 32% of deaths from cardiovascular disease (CVD) in men aged 35-69 years [3]

There is never a situation where it is better to smoke than it is to vape, and we know since 2016 that vaping is at least 95 per cent less harmful than smoking, according to Public Health England (PHE) and the Royal College of Physicians [4].

Currently there are approximately 200,000 vapers (e-cigarette users) in the Ireland. The majority of these vapers, have given up smoking completely. The remaining are smoking significantly fewer cigarettes. 38% of those who made an attempt to quit smoking in Ireland in 2019 used e-cigarettes during this attempt. [5] This should be encouraged.

99% of vapers in Ireland are either smokers or ex-smokers. “Never smokers” make up less than 1% of users [5]. This demonstrates that non-smokers are not taking up vaping and the current regulations are working well.



The Irish Vape Vendors Association (IVVA) is an association that represents independent retailers of vaping products in Ireland. We advocate for evidence based policy on these reduced risk products. Members of IVVA are not owned, nor are under the control of either Big Tobacco or Pharmaceutical companies. Our founding members and board members are all ex-smokers and have been involved in the vaping business in Ireland since the introduction of vaping here.

There is a vibrant independent vape industry in Ireland providing vaping consumers with a wide range of quality vape products. These shops are helping smokers make the switch to vaping and helping smokers become smoke free on a daily basis, with no cost to the state. An internal industry wide survey that IVVA carried out in 2019 reveals that there are approximately 300 independent vape shops in Ireland, providing approximately 1000 jobs in the vaping retail sector.

According to a Euromonitor report published in 2018 [6], it states that Ireland has 3rd highest per capita spend on e-cigarettes in the world, with a spend of €14.40. Based on these figures, spend on e-cigarettes was almost €70 million in 2018, with the exchequer receiving 23% VAT on all sales.

In this manifesto, we set out the significant potential that vaping offers to improve public health and save the taxpayer money whilst at the same time providing employment and tax monies to the exchequer.

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Alex Pescar  
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(IVVA Directors)

# The Next Government Should

## (1) Engage with the Independent Industry & Consumers

Unfortunately, the last two governments, despite many requests from IVVA have failed to engage with our industry. Our industry is often accused of trying to “hook a new generation on nicotine”. This could not be further from the truth. IVVA is independent of tobacco companies and we have no interests beyond helping adult Irish smokers quit smoking. From our years of experience, we are very well placed to understand what it is that is required for this industry to move forward with the best interests of the adult vaping consumer in mind.

## (2) Provide Smokers with Accurate Information & Promote Vaping as Safer Alternative to Smoking

The UK is leading the way, in promoting vaping as a safer alternative to smoking. At least 95% safer [4]. As a result in 2018, UK reports second lowest rate of smoking in EU at 14.7% [7]

For example, just last week, a new report by ASH UK and Cancer Research UK on stop smoking services in English local authorities, recommends that more authorities offer a vaping starter pack to give smokers the best possible chance to quit. [8]

Additionally, it should be communicated to the smoker wishing to quit, that vaping combined with behavioural support is almost twice as effective as NRT. In the largest randomised trial to date, and published in New England Journal of Medicine in February 2019, **the trial found that the 1-year abstinence rate was 18.0% in the e-cigarette group, as compared with 9.9% in the nicotine-replacement group.** [9]

Furthermore, in another largest study to date, looking at the heart health of smokers who switch to vaping and commissioned by Cancer Research UK, this **found that long-term smokers who switched to vaping were halfway towards achieving the vascular health of a non-smoker within a month.** Researchers from the University of Dundee, UK, said they discovered a “clear early benefit” in switching from smoking to vaping [10].

There are many other high quality studies, trials and reports available. From a public health perspective there is huge onus on Government, and Department of Health in particular, to communicate these reports to smokers, so that they may consider making the switch to vaping. To date, any request we have sent to government to issue a statement on the relative safety of vaping compared to smoking have been ignored. In our mind, this is both unacceptable and irresponsible, and this status quo is keeping smokers smoking and is injurious to public health.

### **(3) Adult Choice of E-liquid Flavours are Important and Must Not Be Restricted**

In recent weeks and months there have been growing calls from certain quarters for e-liquid flavours to be restricted or banned. E-liquid flavours are of vital importance to vapers. Having said that, we do accept that the issue of marketing, design and labelling of some e-liquid brands which could be deemed to be attractive to youth should be addressed. Virtually all the e-liquids sold by our members are flavoured. These flavours range from tobacco to mint, fruit & other sweet e-liquids. Most smokers making the switch from smoking to vaping do start on either a tobacco or mint type flavour, as they typically try to replicate what they used to smoke. But when a smoker uses an e-cigarette for the first time, they soon find out that the vapour produced from an electronic cigarette will never taste exactly like a cigarette, because there is no burning / combustion and there is no carbon monoxide. In fact, even the tobacco flavours also have slightly sweet taste that is derived from the main ingredients in the e-liquid i.e. Vegetable Glycerin & Propylene Glycol. Many users do not like this sweet taste when they first make the switch, but they get used to it. Additionally, when a smoker stops smoking, one of the first senses to return is that of taste, and when smokers make the switch they then find that they no longer like the taste of tobacco in their e-liquid, and it is this that has given rise to vast range of flavours that are now available. Many users who find that they no longer like the taste of tobacco move on to a fruit or sweet flavours, and it is this that keeps them satisfied and smoke free.

A real concern which regulators must take onboard if they are proposing flavour bans is that if fruity & sweet tasting e-liquids were to be banned, then there is a very real risk, that users would then start purchasing their own flavours from the food aisle in their local supermarket. This indeed does already happen but is absolutely NOT recommended, as flavourings sold in the supermarket are food grade and not tested for use in e-cigarettes. There is also the real fear that if many flavours were banned, that this would create a black market where vapers would end up buying untested & untraceable e-liquid that could be manufactured anywhere. Somewhat unfortunately, it is relatively easy for any unscrupulous persons to manufacture e-liquid, and where there is a void, this is what would no doubt happen. It is much better for everybody concerned, vapers and regulators alike, that e-liquids are manufactured in certified laboratories where there is full traceability and ISO standards.

The whole area of flavours is quite complex. For example, there are many e-liquids that we in the industry would consider tobacco flavours, but even these may have a mix of fruits, mints etc. Additionally, many of the mint / menthol flavours have hints of fruit and vice versa, where fruit flavours have hints on menthol. It really is down to user preference, and the whole area of flavours from a consumer perspective varies hugely and is distinctly different from person to person. The same divergence in taste and preferences does not occur in the tobacco industry.

We can provide you with more precise figures / statistics, but it is true that tobacco and mint make up the majority of e-liquids sold here in Ireland, with fruity type flavours coming next. What needs to be understood is that the adult vapour who vapes say fruit or bubblegum

flavour for example will not vape a tobacco or mint flavour. This is akin to people who do not like or will not eat certain foods, and if it is an apple flavour that keeps a vaper from returning to smoking then this must not be overlooked.

A major survey, carried out by Dr. Konstantinos Farsalinos, MD, MPH, last year involving over 69,000 participants and submitted to FDA found that nearly 50% of vapers vaped fruit flavours on a daily basis [11]

#### **(4) Under 18's Legislation to be Made a Priority**

When IVVA was founded in 2014, one of the very first rules to be included in our Code of Conduct, was that IVVA members do not sell e-cigarette products to those under 18 years of age. This policy is strictly enforced by all our members, and we welcome legislation that will back up our existing policy. We have called on both the current and previous government to implement this legislation, but as things stand this important legislation has still not been enacted.

Regarding proposed new licensing system for the sale of tobacco products and nicotine inhaling products, the IVVA remain open to consultation on this matter. Given that e-cigarettes / vaping is demonstrably much safer than smoking and that vaping is currently the most popular "quit smoking" method in Ireland, it is of vital importance that a licensing system for the retail of e-cigarettes is fair and proportionate.

#### **(5) Tax / Excise Tax**

All vaping products are subject to 23% VAT which goes to the exchequer. However, there is pressure from certain EU Member states to introduce an EU-wide excise regime for vape products. We urge the next government to continue to resist EU attempts to introduce this tax. Vaping products should not be subject to a "sin tax", in that in the general scheme of things, smokers who switch to vaping are in fact doing the most important thing they can do to improve their health by quitting smoking.

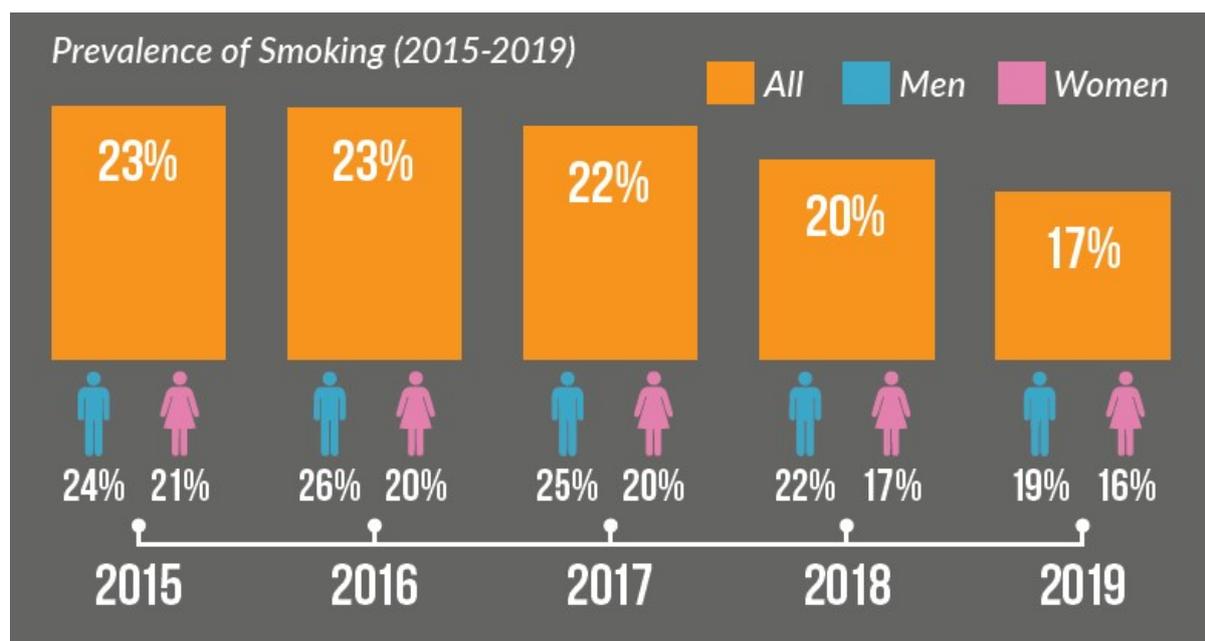
From the consumer perspective, it is currently much cheaper to vape rather than smoke. If as a result of additional tax, that vaping products were to become more expensive, the cost / price incentive that currently makes vaping an attractive proposition to a smoker would be negated, and the smoker in question may not then make the switch. This would have a hugely negative impact on smokers' health.

## Vaping – The Opportunity

Each year 6,000 people die from smoking related illnesses in Ireland, according to HSE figures [1]. About €11.8 million was spent on smoking cessation measures including medications, services, the national quitline and media campaigns in 2017 while it was estimated that costs related to the impact of smoking totalled €1.65 billion. [12]

Much of this taxpayers' money is wasted on NRT products that have a recognised failure rate of around 90 per cent [9]. Vaping, by contrast, represents a market-based, user driven, public health boon. No taxpayers' money has been spent, yet smokers are quitting, switching, and cutting down through the use of vape products. The number of people vaping has risen from virtually zero in 2008 to 200,000 in 2019. Vaping has replaced NRT products as the most popular tool for helping smokers quit.

As vaping has increased in popularity the smoking rate has continued to decline. The prevalence of smoking has dropped from 23% in 2015 to 17% in 2019, as the popularity of vaping has increased [5].



Healthy Ireland Report 2019

Further to this, a recently updated Cochrane review in 2016 confirmed that vaping helped smokers quit with no significant side effects [13].

Vaping is now recognised as the most popular tool used by smokers to help them quit [5]. Despite this encouraging trend, there are still 700,000 smokers in Ireland. If the next Government takes a pro-active approach to encouraging smokers to switch to vaping, then not only would there be a much-needed saving on the health budget, there would also be far fewer smokers.

## Vaping FAQ

### **Is vaping less harmful than smoking?**

Yes. In 2016, the Royal College of Physicians said (Section 5.5 page 87): “Although it is not possible to precisely quantify the long-term health risks associated with e-cigarettes, the available data suggest that they are unlikely to exceed 5% of those associated with smoked tobacco products, and may well be substantially lower than this figure.” [14]

### **What About the Lung Illness in United States? Weren't these illnesses caused by vaping?**

No. These illnesses were caused by people vaping e-liquid which contained THC and mixed with Vitamin E acetate. Regulation of e-liquids in Ireland & EU is much stricter than US and neither of these ingredients are permitted for use here.

### **Do we know what is in e-liquid?**

Yes. All nicotine containing e-liquids sold in EU consists of 4 main ingredients. Propylene Glycol, Vegetable Glycerin, Flavours & Nicotine. By law all these liquids must undergo stringent toxicological and emissions tests and be notified to HSE before being placed on the market.

### **Is vaping an effective tool for helping someone quit smoking?**

Yes. In randomised trials vaping has been shown to be nearly twice as effective as traditional NRT for those trying to quit smoking. [9]

### **Is nicotine, when consumed by a vaper in e-liquid dangerous?**

No. Pure nicotine is a toxic substance and should be handled with care. The maximum nicotine strength permitted under EU regulation is 20mg / 2%. Most vapers reduce the nicotine strength they use over time. The vast majority of e-liquids contain pharmaceutical grade nicotine, the same as that used in NRT products.

Robert West, Professor of Health Psychology and Director of Tobacco Studies at University College London's Department of Epidemiology and Public Health said, “E-cigarettes are about as safe as you can get. We know about the health risks of nicotine. Nicotine is not what kills you when you smoke tobacco. Vaping is probably about as safe as drinking coffee.”

### **Do children (under 18s) regularly vape and is it a gateway to smoking?**

No. The key issue here is not how many children try or experiment with vaping, but rather how many vape regularly having tried vaping, and how many go on to smoking. The Healthy Ireland 2019 Report shows that the prevalence of smoking in Ireland has dropped from 23% in 2015 to 17% in 2019. In same period, the percentage of people vaping has increased from 3% to 5%. There is no evidence of a gateway effect here. Additionally the same report states that 99% of those who vape are either smokers or ex-smokers. [5] Vaping is a gateway away from smoking.

### **Is passive vaping damaging to the health of non-vapers?**

No. Cancer Research UK state “E-cigarettes do not use combustion and there is no side-stream vapour (i.e. the smoke from the lighted end of the cigarette), so the only source of second-hand vapour is that exhaled by the user. The evidence to date suggests toxicants may be present but at much lower levels in second-hand e-cigarette vapour than second-hand cigarette smoke and there is no convincing evidence of harm to bystanders so far. Any harm to both users and bystanders from second-hand vapour is likely to be much lower than that of tobacco.” [16]

Additionally, research from Public Health England and The University of Stirling concluded: “The evidence to date does not support a policy to prohibit vaping in public and such policies could have significant unintended consequences by sustaining the use of smoked tobacco.”

### **Aren't the World Health Organisation and other Organisations critical of vaping?**

For reasons not fully known to us, the WHO and some other well known and respected organisations are critical of vaping. Often however, when press releases and statements are issued which are critical of vaping, these statements are regularly issued without science or evidence to back up their claims. At IVVA we simply say – look at the science and listen to those who have no ties to big tobacco or pharmaceutical companies.

In an article published in the Lancet in August 2019, Robert Beaglehole, Clive Bates, Ben Youdan & Ruth Bonita state, in the article entitled “Nicotine without smoke: fighting the tobacco epidemic with harm reduction” - “The rapid rise of smoke-free nicotine products, especially vaping, is the most disruptive influence on smoking in decades. These products are challenging not only smoked tobacco’s stranglehold on the nicotine market but also the public health response to tobacco harm reduction, including by WHO. In October, 2018, 72 experts with no connections to the tobacco industry wrote to the WHO Director-General to argue that WHO should embrace innovation and more actively include tobacco harm reduction in its strategy to tackle the burden of smoking-related disease. However, the WHO Report on the Global Tobacco Epidemic, 2019 continues to underappreciate the potential of low-risk alternatives to smoking. The tobacco harm minimisation strategy complements other tobacco control strategies but has been under appreciated because for many in tobacco control the emphasis has been on achieving abstinence of all tobacco and nicotine use. However, abrupt cessation of nicotine has had low population success rates—for example, 4–5% in the USA. Regrettably, many smokers find it hard to quit and go on to die prematurely—around 8 million a year.” [17]

The positions taken by the WHO are extreme and are not supported by the growing body of credible and independent evidence. In recent times, the WHO position on vaping was publicly attacked by amongst others: Professor John Britton (UK Centre for Tobacco and Alcohol Studies, University of Nottingham), Professor Ann McNeill (UK Centre for Tobacco and Alcohol Studies, King's College London), and Professor Linda Bauld (UK Centre for Tobacco and Alcohol Studies, University of Stirling).

### **Is vaping in Ireland regulated?**

Yes. Vaping in the Ireland is heavily regulated, and in some instances, vaping is more heavily regulated than some tobacco products. The primary regulation for vape products in the Ireland & EU is the EU TPD, Article 20. These regulations place restrictions on nicotine strength, advertising, bottle and tank sizes. They also impose legal requirements on companies to test devices and liquids and to notify the results to the HSE.

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