

Dutch Government

To whom it may concern

## Tackling e-Cigarettes

### Introduction

In 1997, a group of professors at the University of Applied Sciences in Frankfurt founded the Institute of Addictions Research Frankfurt (ISFF), in order to stimulate applied research projects on addictions – e.g. substance use problems in women and women-specific treatment and rehabilitation, drug problems, drug users, harm reduction measures, treatment and rehabilitation etc. Meanwhile, the institute is well established within the University, the region, Germany and Europe. It is part of a number of networks on addictions research in Germany and in Europe.

While the regulation of conventional tobacco products aims to dissuade existing smokers from consuming cigarettes and at the same time discourages potential new smokers, the main aim of the regulation of new types of tobacco products should be to encourage smokers, who cannot or do not want to stop using nicotine, to switch to less harmful alternatives. It is therefore a matter of structuring the regulation in such a way that, on the one hand, smokers interested in switching have barrier-free access to alternative products, while for non-smokers (minors) the access should be made as difficult as possible.

The potential for this approach is immense. A groundbreaking study relating solely to the USA puts it this way: “Compared with the Status Quo, replacement of cigarette by e-cigarette use over a 10-year period yields 6.6 million fewer premature deaths with 86.7 million fewer life years lost in the Optimistic Scenario. Under the Pessimistic Scenario, 1.6 million premature deaths are averted with 20.8 million fewer life years lost.”<sup>1</sup>

---

<sup>1</sup> Levy et. al. (2017): Potential deaths averted in USA by replacing cigarettes with e-cigarettes. In: Tobacco Control, available online at: <https://tobaccocontrol.bmj.com/content/27/1/18>.

Current risk assessment deems e-cigarettes to be considerably less harmful than continuing to smoke and thus suitable now for making a contribution to reducing the risks of smoking. For example, Public Health England estimates that e-cigarettes are 95 percent safer than smoked tobacco and may be of help with giving up smoking.<sup>2</sup>

### **Flavors are important for smokers**

The Dutch government is planning a major cut. E-cigarette flavors other than tobacco flavor should be banned. But empirical research results show that flavors are an important reason why tobacco smokers switch to the e-cigarette.<sup>3</sup>

A survey of around 70,000 vapers over the age of 18 showed that fruit flavors were by far the most popular flavors at the beginning of e-cigarette consumption. A quarter of those surveyed started with the varieties “dessert / cake” and only 7 percent initially preferred tobacco flavors.<sup>4</sup> More recent studies come to similar results.<sup>5</sup>

If all flavors or at least some of these flavors were banned, then there would be no major incentive for many consumers to switch.

### **Gateway to smoking?**

There are concerns that e-cigarettes could represent a ‘gateway’ into a life of smoking for young people and non-smokers alike. This concern must be addressed by continued observation of the market.

Fortunately, however, current figures show no indications of such an effect – the number of young users of e-cigarettes is very low. In 2018, a German study on tobacco use (DEBRA)

---

<sup>2</sup> McNeill, A. et. al. (2015): E-cigarettes: an evidence update - A report commissioned by Public Health England, available online at: <https://www.gov.uk/government/publications/e-cigarettesan-evidence-update>.

McNeill, A. et. al. (2018): Evidence review of e-cigarettes and heated tobacco products 2018 - A report commissioned by Public Health England, available online at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/684963/Evidence\\_review\\_of\\_e-cigarettes\\_and\\_heated\\_tobacco\\_products\\_2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/684963/Evidence_review_of_e-cigarettes_and_heated_tobacco_products_2018.pdf).

McNeill, A. et. al. (2018): Evidence review of e-cigarettes and heated tobacco products 2018 - A report commissioned by Public Health England, available online at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/684963/Evidence\\_review\\_of\\_e-cigarettes\\_and\\_heated\\_tobacco\\_products\\_2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/684963/Evidence_review_of_e-cigarettes_and_heated_tobacco_products_2018.pdf).

McNeill, A. et. al. (2019): Vaping in England: an evidence update February 2019. A report commissioned by Public Health England, Public Health England: London.

<sup>3</sup> Kotz, D./Böckmann, M./Kastaun, S. (2018): Nutzung von Tabak und E-Zigaretten sowie Methoden zur Tabakentwöhnung in Deutschland. Dtsch. Arztebl. Int, 115, 235-242.

<sup>4</sup> Farsalinos, K. et al (2018): Patterns of flavored e-cigarette use among adult vapers in the United States. Report submitted to: Docket No. FDA-2017-N-6565

<sup>5</sup> Landry, R. et al. (2019): The role of flavors in vaping initiation and satisfaction among U.S. adults. In: Addictive Behaviors. 99 (12) 106077

showed that 'E-cigarettes are only very rarely consumed in Germany by people who have never smoked.

Over the whole observation period, the prevalence in that population stayed below 0.5 percent. The 'weighted one-year prevalence of current e-cigarette consumption' was 1.9 percent in the general population and 2.8 percent in the 14-17-year-old group (of whom >60 percent were cigarette smokers).<sup>6</sup>

We find a similar development in the Netherlands. Regular use of e-cigarettes among adolescents is very low. In 2019, only 0.2 percent of Dutch teenagers (14-16) were regularly users of e-cigarettes.<sup>7</sup> 99,8 percent of all Dutch users of e-cigarettes were former smokers.<sup>8</sup>

At the same time, we see among young people a historically low proportion of smokers, which is probably the best indication that the anticipated gateway effect (not smoking --> e-cigarette --> combustible cigarette) is not there to be seen. On the contrary – across the world, the fall in the number of smokers, particularly among young people, is accelerating when e-cigarettes are used. This means that we are not seeing the anticipated return to smoking as a normal practice. Instead, what is actually happening is that smoking cigarettes with tobacco is becoming less normal.

### **Recommendations to politicians and authorities**

The provision of information to the public and smokers in particular on the benefits of e-cigarettes, tobacco-free nicotine products and tobacco harm reduction is completely inadequate. A survey conducted by the Federal Institute for Risk Assessment (BfR) revealed alarming gaps in people's understanding: 61 percent of respondents thought that the health risks with e-cigarettes were exactly the same, higher or much higher than the risks with cigarettes containing tobacco.<sup>9</sup>

As in the UK, Canada and New Zealand, switching completely to e-cigarettes should be communicated, supported and recommended by health authorities as a means of helping to lower the numbers of smokers.

---

<sup>6</sup> Kotz, D./Kastaun, S. (2018): DEBRA – Deutsche Befragung zum Rauchverhalten | German Study on Tobacco Use, available online at: <http://debra-study.info/wordpress/>.

<sup>7</sup> Opendata Statline NL

<sup>8</sup> Cijfers roken, Trimbos 2019

<sup>9</sup> German Federal Institute for Risk Assessment (BfR) (2019): Verbraucher Monitor (User Monitor) 2019, Spezial E-Zigarette (E-cigarette Special), available online at: [www.bfr.bund.de/cm/350/bfr-verbrauchermonitor-2019-spezial-e-zigaretten.pdf](http://www.bfr.bund.de/cm/350/bfr-verbrauchermonitor-2019-spezial-e-zigaretten.pdf)

## Conclusion

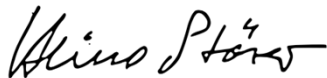
There is a need to provide reliable, neutral guidance for smokers and users of e-cigarettes on choosing suitable products and also to lower barriers to switching to alternative products not involving burning tobacco (e.g. e-cigarettes).

In the view of the authors, there is an absolute ethical necessity of pursuing a policy of providing differentiated information on the risks or, in other words, of stating unequivocally that e-cigarettes are not harmless, but constitute a less harmful alternative to continuing to smoke if otherwise smokers cannot manage to refrain from smoking tobacco cigarettes, which are far more harmful.

For the reasons mentioned, we consider a ban on flavorings to be the completely wrong approach, because it only disadvantages adult smokers. In addition, an important argument for smokers to switch to the harm-reduced e-cigarette would be eliminated.

Kind regards,

Frankfurt am Main, 18 January 2021



---

Prof. Dr. Heino Stöver  
Director, Institute of Addiction Research