

Regarding flavour bans in general, these have failed to address issues raised (universally and almost without exception), having unintended consequences that outweigh any benefit.

Please see the results of this ban:

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In April 2018, the ban on flavoured e-cigarettes and vapor products went into effect in San Francisco and in January, 2020, the city had implemented a full ban on any electronic vapor product. Unfortunately, these endeavours have failed to lower youth tobacco and vapor product use. Although addressing youth tobacco and vapor product use is laudable, existing evidence continues to show that flavour bans don't work and in fact, threaten harm reduction options for millions of American adults that have used e-cigarettes to quit smoking.

Full article <https://www.thr101.org/research/2020/vaping-up-smoking-increasing-among-teens-in-san-francisco-despite-bans>

Regarding bans in proposed in Vermont Canada (march 23 2021):

The implications are two-fold: First, a ban on menthol cigarettes, as we've seen with prohibitions of flavoured vapes in Massachusetts and New York, would probably force consumers to an illicit market where they use these products without regulatory protections; and second, such laws would be enforced, potentially increasing the number of interactions between police and people of color.

Full article <https://filtermag.org/vermont-ban-vapes-menthol/>

October 3 2019, public policy organisation Macinac Center letter to oppose a national ban:

Bans likewise encourage illegal markets, and products in illegal markets tend to be more dangerous to their consumers. The "Iron Law of Prohibition," states that the more intensive the law enforcement efforts against something, the more potent (if not dangerous) the product or activity becomes. Given the ban, vapers will risk acquiring illicit products that may have more kick from nicotine (or an illicit drug) and be more potent than their legal and regulated counterpart. During Prohibition, gin and whiskey, rather than beer, was preferred by smugglers and consumers alike because it provided more buzz at a lower cost.

2020 Jul 9 Orange County coalition of police and sheriffs:

"While I'm sure your goals are well intended, the 100% ban on menthol cigarettes and flavoured tobacco (exception for hookah) products to adults makes impracticable sense and it will multiply an already large illegal market in California, reward criminal smugglers, and cost California businesses, workers, and taxpayers billions of dollars. Banning flavoured products will further criminal smuggling and tax evasion problems."

Further people have died due to police interactions, for selling illegal cigarettes, and putting vaping supplies in the same legal space is almost guaranteed to increase interactions with police. Full article <https://www.history.com/this-day-in-history/eric-garner-dies-nypd-chokehold>

Your policy to restrict (to the point of it being almost impossible to create a tobacco flavour, or otherwise palatable to the user), simply repeats the mistakes made elsewhere. You should take the evidence and note the results of such bans, almost all had unintended consequences, at the cost of smokers lives. Do you really want to repeat the mistakes of others, or will you learn from them?

Thank you for your consideration.