



World Vapers' Alliance:

**Response to Netherlands Regulation of the State Secretary for Health, Welfare, and Sport, Amending the Tobacco and Tobacco Products Regulation  
In connection with the introduction of standard packaging for cigars and electronic vapor products (Chain ID WGK27361)**

The [World Vapers' Alliance \(WVA\)](#) writes to express strong concerns regarding the proposal to introduce plain packaging for vaping products. While we fully support the goal of reducing smoking rates in the Netherlands, the available evidence – both international and Dutch – shows that the measures proposed will not deliver the intended benefits and risk undermining tobacco harm reduction, ultimately making public health outcomes worse.

**Plain Packaging is a gift to the Black Market and Puts Consumers at Risk**

By standardising all products to look identical, plain packaging makes it easier for illicit actors to flood the market with counterfeit or illegal vapes. Recent [enforcement actions](#) in the Netherlands speak volumes: more than 200,000 illicit vapes and 70,000 bottles of illegal flavours were seized in just the first six months of 2025. Following the 2024 flavour ban, research shows that [80% of Dutch vapers are now sourcing products either abroad or through illegal channels](#).

With no clear way to distinguish legal from illegal or higher-quality from potentially dangerous products, adults – and especially youth – are put at much greater risk. Many recent hospitalisations and severe lung injuries among teenagers have been [linked to illicit vaping](#) liquids purchased through the black market, not to legal, regulated products. This is a public health threat created by misguided policy.

**Plain Packaging Is Ineffective for Smoking or Vaping Reduction**

Real-world experience makes it clear: plain packaging fails to stop people from smoking or encourage current smokers to quit. Data from countries where plain packaging has been introduced, such as the UK and France, [show no significant impact](#) on cigarette consumption when accounting for other influencing factors, like price hikes or broader anti-smoking measures. Interestingly, the same econometric analysis found a 5% increase in cigarette consumption in France following the introduction of plain packaging, indicating that the policy may have actually worsened public health outcomes – the exact opposite of its intended goal. Another independent evaluation reached [similar conclusions](#).

In the Netherlands itself, [smoking rates have declined](#) steadily over the past decade, from 25.7% in 2014 to 18.2% in 2024, with no evidence that packaging policy had any noticeable effect on this trend.

Nevertheless, worth noting is that this reduction in smoking has actually been considerably slower than in Sweden, where—rather than banning flavours—policymakers embraced harm reduction by allowing products like snus & pouches and making vapes widely accessible.



Over the past decade, smoking in the Netherlands has fallen by around 29%, compared to an impressive 55% reduction in [Sweden](#). Sweden's pragmatic approach delivered a record-low daily smoking rate of 5.3% in 2024, putting them on track to become Europe's first smoke-free country. Apparently, helping smokers switch works better than making alternatives less attractive.

## Vaping Is Not Smoking: Misleading the Public Harms Health

It is vital that Dutch policy makes a clear science-based distinction between combustible cigarettes and vaping. Vaping is at least 95% less harmful than smoking, as established by [Public Health England](#) and reconfirmed by the [Royal College of Physicians](#). The vast majority of the risks from smoking come from combustion and the toxic chemicals in smoke, not from nicotine itself. Additionally, vaping is proven to be one of the [most successful smoking cessation aids](#). Studies confirm that [vaping is twice as effective](#) as NRTs.

Applying the same warnings and packaging to vapes as to cigarettes equates these two very different products in the minds of consumers. Already, [85% of Dutch citizens wrongly believe vaping is as dangerous](#), or more dangerous, than smoking. This misperception discourages smokers from switching to a drastically less harmful alternative, undermining efforts to make the Netherlands smoke-free and costing lives in the process.

More scientific evidence can be found here:

<https://worldvapersalliance.com/harm-reduction-vaping-fact-sheet/>

## Better Alternatives: Evidence-Based Harm Reduction

Rather than pursuing counterproductive packaging restrictions (and flavour bans), the Netherlands should look to success stories such as Sweden and the UK. Sweden is on the brink of becoming Europe's first smoke-free country by focusing on effective alternatives rather than punitive measures. The UK launched a [national programme](#) to help a million smokers switch to vaping, based on real evidence and public health gains. Similar success stories are emerging across Europe. The [Czech Republic's impressive 23% reduction](#) in smoking rates over just three years showcases the power of adopting science-based, pragmatic policies that prioritise effective harm reduction strategies. Similarly, [Greece's 14% decline in smoking prevalence](#) during the same timeframe reflects the success of a national approach that integrates harm reduction as a fundamental component. Both countries exemplify how embracing less harmful nicotine alternatives and grounding public health policies in evidence can lead to rapid and meaningful decreases in smoking rates, reinforcing the value of comprehensive harm reduction frameworks across diverse European contexts.

## Recommendations

- **Plain packaging should not be applied to vapes.** Doing so only empowers the black market, misinforms smokers, and undermines public health.



- **Warnings and packaging rules designed for cigarettes should never be imposed on vapes**, given the fundamentally different risk profiles and user needs.
- **Policymakers must support accurate, accessible information and practical harm reduction strategies** to help smokers find safer alternatives.
- **Learn from Sweden, the UK, the Czech Republic, and Greece**, where pragmatic, innovation-friendly approaches are delivering true progress towards smoke-free goals. These countries demonstrate that embracing harm reduction, supporting safer nicotine alternatives, and grounding policies in science can rapidly reduce smoking rates and save lives.

The World Vapers' Alliance stands ready to provide further evidence, engage in dialogue, or support policy development that prioritises consumer safety, accurate information, and effective harm reduction in Dutch public health.

Contact:

Michael Landl

Director, World Vapers' Alliance

[michael@worldvapersalliance.com](mailto:michael@worldvapersalliance.com)

<https://worldvapersalliance.com/>