

9<sup>th</sup> January 2019

To Whom it May Concern,

I am writing to you today to address the new legislation you are putting in place, regarding the banning of the sale of e-cigarettes to young people under 18 years of age, along with the new licensing system to be implemented with it.

Firstly, before I get to my point allow me to introduce myself. My name is Julia Dubaj. I am 17 years old and I live in County Mayo. I personally completely agree with the movement and the idea behind the new legislation. I strongly believe that young people need to be protected from nicotine addiction. As you know, nicotine products can have a detrimental effect on a person's health. Even e-cigarettes, a nicotine product widely considered relatively harmless, have many adverse health effects, including asthma, lung cancer and increased risk of cardiovascular disease (1).

Addiction is also a widely known quality of nicotine. Therefore the use of 'safer' nicotine products can lead to other, more harmful products, such as conventional cigarettes, which have more deadly effects on their health. In fact, studies have shown that children who use e-cigarettes are more likely to smoke later in life(2).

Nicotine products can lead to the deaths and long term addiction and suffering of many Irish people. I believe that you, as the Health Committee of the Government, must take action to help protect Irish children from the dangers of these products. Therefore I am delighted that you and the government are taking such decisive action against the issue of nicotine products by implementing this legislation to decrease the use of e-cigarettes in Ireland. However I find this new law lacking in certain ways.

I believe that simply banning the sale of e cigarettes will not prevent people from vaping. As long as there is an appeal towards e-cigarettes among young people, young people will continue to use them. Young people still have access to e-cigarettes through older siblings or friends, who can buy the e-cigarettes for them. In order to prevent their use, it is necessary to launch a campaign to remove the appeal of e-cigarettes, .

This was seen before in our journey to decrease tobacco smoking. The introduction of the smoking regulations in 2009 did cause a decrease in smokers in Ireland, as the smoking prevalence decreased from 25.9% in 2009 according to trends recorded on drugsandalcohol.ie (3), to 23% in 2015, as seen by a survey by Healthy Ireland (4).

However, a significant decline in smoking prevalence was only seen after a campaign was launched to denormalise tobacco, with the introduction of the Plain Packaging Bill in 2015.

Since the start of this campaign, the smoking prevalence dropped from 23% to 17% in 2019, according to another survey by Healthy Ireland (5). This is a drop twice as large in a substantially smaller amount of time.

We see the same battle today today against e-cigarettes. In order to sufficiently lower the amount of young people smoking in order to achieve a tobacco free Ireland, in accordance with the goals of your Tobacco Free Ireland policy (6), it is necessary to denormalise e-cigarettes to the public, to discourage young people from vaping.

For this purpose, I strongly recommend that along with the ban on the sale of e cigarettes to under 18's, the legislation should also include:

- a ban on the use of any flavours in e cigarettes
- a ban on any form of advertising of e cigarettes.

### **Ban on the Use of Flavouring in E-Cigarettes**

I suggest that the government outlaw the use of any flavourings in e-cigarettes, except for tobacco flavour. E-cigarettes are meant to be a health product designed for people who intend to quit smoking. They are marketed as a way to stop or cut down on smoking. If they are intended only as a tool to stop smoking, they do not require to have sweet flavours, such as strawberry or candyfloss, for this purpose. Therefore the sweet flavours can only be used to encourage more people to use e-cigarettes.

Furthermore, the sweet candy flavours added to e-cigarettes have shown to be particularly appealing to children. Studies have shown that children are naturally more attracted to sweet tasting foods, while adults are not influenced by sweet tastes(7). From this we can see that sweet tasting flavours must can only be intended to target children and young people, to encourage them to use e cigarettes.

However,as most children do not smoke, they have no need for a product that would help them cut down on smoking. It is clear that the only reason for these sweet flavourings encouraging children to buy e-cigarettes is to encourage young people who have never smoked to start vaping.

It is obvious that this practice can only be intended to get young people addicted to nicotine. This will increase the likelihood of them smoking conventional cigarettes later, exposing them to all the devastating effects of tobacco.

In order to protect Irish children from being lured into a cycle of nicotine addiction, it is essential to stop e-cigarette companies from targeting children. For this purpose, I urge you to place a ban on all e-cigarette flavours except for tobacco flavour, so as to remove the temptation of e cigarettes for children.

### **Ban on Advertising of E-Cigarettes**

I propose that the government ban all advertising of e-cigarettes.

The main purpose of advertising for any product is to entice new customers to buy the product. In this particular case it is clear that the advertisements for e-cigarettes are intended to encourage people to start vaping, to recruit new customers for the tobacco companies who make them. The advertising put out about e-cigarettes is completely designed to tempt people to buy e cigarettes. Despite being marketed as a tool to help one quit smoking, most of the commercials do not refer to tobacco or the health reasons they are supposedly sold for.

The e-cigarette commercials are misleading, presenting e cigarettes as cool and fashionable. They make use of bright colours and glamorous imagery, and focus on the positive effects of vaping. In these advertisements, the negative health effects of e-cigarettes are completely omitted. Instead, these advertisements show images of young, healthy people vaping, putting forward the misleading image that vaping is perfectly healthy and acceptable.

In this day and age, we can see the incredible power of media and advertising to influence the public. Advertising has been the greatest tool used by politicians, businesses and advocacy groups to persuade people to their cause. Over the course of our efforts to eliminate the use of tobacco, we can see that tobacco advertising had greatly contributed the increase of smoking (8). On the other hand, tobacco prevention commercials and videos have been a large and successful tool in the reduction of smoking rates(8).

This is no different for e-cigarettes. Therefore I strongly suggest that you take action to stop this flagrant use of underhanded and misleading advertising, and implement a ban on all forms of e-cigarette advertising.

I hope to see my recommendations taken into consideration in the review of the new e-cigarette laws. I believe it is your responsibility to protect young people from the many dangers of nicotine products and the influence of nicotine. Therefore myself and many other people in my community and across the country call on you to act now, to stop the spread of e-cigarettes, by eradicating the temptation of such products for young people. In doing so, you will take a step closer to removing the use of nicotine products in our country.

Yours faithfully,

Julia Dubaj.

## Citations:

- 1: <https://www.lung.org/stop-smoking/smoking-facts/impact-of-e-cigarettes-on-lung.html>  
<https://newsroom.heart.org/news/e-cigarettes-linked-to-higher-risk-of-stroke-heart-attack-diseased-arteries>
- 2: <https://www.degruyter.com/view/j/ijamh.2018.30.issue-3/ijamh-2016-0033/ijamh-2016-0033.xml>  
<https://tobaccocontrol.bmj.com/content/27/4/365.abstract>
- 3: [https://www.drugsandalcohol.ie/22499/1/Smoking%20Trend\\_Data\\_2003%20-%202013.pdf](https://www.drugsandalcohol.ie/22499/1/Smoking%20Trend_Data_2003%20-%202013.pdf)
- 4: <https://www.lenus.ie/bitstream/handle/10147/579447/Healthyireland+survey.pdf?sequence=1>
- 5: <https://assets.gov.ie/41141/e5d6fea3a59a4720b081893e11fe299e.pdf>
- 6: <https://www.gov.ie/en/publication/0e91fc-tobacco-free-ireland/?referrer=/wp-content/uploads/2014/03/tobaccofreeireland.pdf/>
- 7: <https://www.npr.org/sections/thesalt/2011/09/26/140753048/kids-sugar-cravings-might-be-biological?t=1578069594360>
- 8: <https://ajph.aphapublications.org/doi/full/10.2105/AJPH.2004.049692>