Written evidence submitted by Nerudia (ECG0048)

Nerudia is a highly centralised, UK-based, international research and development business supporting companies operating in the Nicotine Delivery market and we welcome the opportunity to submit written evidence to the Select Committee inquiry on e-cigarettes.

Introduction

Nerudia is an international business supporting companies operating in the Nicotine Delivery market. We would like to take this opportunity to share our experience and sectoral knowledge on the health, regulatory and financial implications of electronic cigarettes and nicotine vaping products.

We believe that e-cigarettes and novel tobacco products have the potential to be a highly successful tool in helping people to stop traditional tobacco smoking, or to reduce the amount that they may smoke, to the benefit of theirs and public health.

The development and implementation of effective public health policies that significantly reduce disease and death from tobacco use is going to require the involvement of numerous stakeholders, interests, and disciplines, working both independently and together, as well as transparently. This includes government agencies and regulators; public health officials; researchers and scientists; manufacturers of tobacco, nicotine, and alternative products; consumers of these products; farmers and entrepreneurs. Everyone has a critical role to play if we are to achieve the Department for Health’s ambitions to reduce the number of people smoking and to reduce the harm caused by traditional tobacco smoking by 2022, as outlined in their recent Tobacco Control Plan.

Nerudia believe that the UK has a highly successful, responsible and well-developed e-cigarette and vaping industry, and one which not only provides smokers with a range of potentially reduced risk products, but also creates opportunities for enhanced scientific capabilities, reputations and increasingly highly-skilled job development in this growing sector. Furthermore, the success of the UK e-cigarette and vaping industry has the potential to grow further, including working with international policy makers and the gateway to exporting high quality products and expertise overseas, which will benefit both the UK economy and also HM Treasury’s coffers.

Whilst we fully support appropriately regulated business practices, we do not believe that the UK e-cigarette and vaping industry needs further regulation, and are concerned that any additional costs imposed on the industry would simply be passed on to the consumer, reducing these lower-risk products’ competitiveness against traditional tobacco products and thus potentially stopping smokers from considering switching to products that offer a potentially reduced-risk opportunity.

If the UK and other public health stakeholders are serious about the potential public health benefits of providing smokers with potentially safer alternatives to conventional tobacco products (albeit through a regulated environment), it would make more sense to look at initiatives such as recovering the fees incurred through regulatory management of vaping products through other product sectors with a potentially reduced or more negative impact upon public health; thus maintaining or increasing the price gap between tobacco and vaping products and, in doing so, make the financial incentive for smokers to move away from combustible products far more attractive, whilst not distracting from the number one reason smokers are switching i.e. the potential health benefits.

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Nerudia believe that there is a further risk and danger of over-regulation in that the compliance cost/burden on reputable manufacturers may be too high for them to meet, which leaves the door open for “not-so” reputable and black-market suppliers to meet an already created demand. This can either take the form of illegally supplied finished products, via routes such as the Internet, or unregulated ingredients being sold to consumers in order to mix their own liquids. The major downfall for vapers is that a vapour black market would have no guarantee over the quality of the devices or ingredients of e-liquids. There would be no motivation for black-market manufacturers to meet any products standards and consumers/vapers would have no idea what was in their product or if it was the actual brand that they had intended to buy.

The impact on human health of e-cigarettes—themselves and relative to ‘conventional’ smoking—and any gaps in the science knowledge-base in this area.

Nerudia and our engaged clients agree with many in the area of public health that electronic cigarettes and vaping products have the opportunity to provide smokers with potentially safer alternatives to conventional combustible tobacco products. Indeed, the 2015 Public Health England report\(^3\) suggested that electronic cigarettes and vaping products provide smokers with a 95% safer alternative to combustible tobacco products. The report also suggested that many smokers were switching to electronic cigarettes to either reduce their combustible cigarette intake or quit their usage completely, regardless of the fact that electronic cigarettes are not marketed as cessation aids.

Nicotine, though addictive and habit-forming for some, is not itself a significant factor in the causation of disease, and if we are to reduce death and disease caused by traditional smoking, as well as the estimated £2.6bn total estimated smoking-related cost to the NHS\(^4\), addicted smokers urgently need access to significantly lower risk tobacco, nicotine, and alternative products.

In order to achieve this goal, it is necessary to inform the general public, consumers, policy makers, healthcare providers and other stakeholders about the benefits that can be obtained by switching from a combustible tobacco product to a significantly lower risk non-combustible product.

Today’s products include not only the more traditional tobacco and nicotine products, but newer innovations including gums, lozenges, Electronic Nicotine Delivery Systems (ENDS) including e-cigarettes, heat-not-burn products and inhalers.

This expansion presents new challenges, but it also creates new opportunities for reducing the devastating disease and death caused by the use of tobacco on both a national and global scale.

The uptake of e-cigarettes among young people and evidence on whether e-cigarettes play a role in ‘re-normalising’ smoking.

We do not believe that e-cigarettes are helping to re-normalise smoking, but are instead providing potentially reduced-risk alternatives for people who want to move away from traditional combustible cigarettes or to reduce the amount that they smoke.

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A recent Public Health England (PHE) report found that almost all of the 2.6 million adults using e-cigarettes in Great Britain are current or ex-smokers, most of whom are using the devices to help them quit smoking or to prevent them going back to cigarettes. It also provides reassurance that very few adults and young people who have never smoked are becoming regular e-cigarette users (less than 1% in each group). This should allay fears that vaping is a gateway to smoking, an argument often used in an attempt to prevent the development of these products.

At Nerudia, we can only speak for the electronic cigarette and vaping product companies that we represent, however, for all these companies, the target market for these products is adult smokers and those people already using vapour products and looking for more personalised solutions to their nicotine needs.

**The safety of e-cigarette devices, and any safety regulation requirements.**

As producers of e-liquid, we do not produce e-cigarette devices themselves, however we are proud of the safety of our e-liquid products.

At Nerudia we are committed to producing e-liquid to the highest standards practicably achievable. We manage this through using quality raw materials; continuous improvement of our processes and procedures; and the experience and expertise of our employees.

Manufactured at our pharmaceutical facility in Liverpool, UK, our e-liquid is produced in cGMP Grade D cleanrooms using pharma grade ingredients. With close relationships with the finest flavour houses, and bespoke mixing methodology, we ensure full flavour infusion in every formulation.

By working to Good Manufacturing Practice (GMP), we ensure that products are consistently produced and controlled, and are fit for purpose. This covers all aspects of production from the starting materials, our premises and equipment, through to training and personal hygiene of staff.

Nerudia are committed to continually improving the effectiveness of our Quality Management System through regular review of policies and procedures, and effective communication of these changes across the organisation.

Our unique focus allows us to manufacture in a pharmaceutical way without incurring pharmaceutical costs. Catering for both global and domestic brands, we offer a portfolio of products and services to our customers.

**Conclusion**

We strongly believe that e-cigarettes and novel tobacco products have the potential to be highly successful tools in helping people to stop traditional tobacco smoking, or to reduce the amount that they may smoke, to the benefit of theirs and public health.

Given the number of smokers of traditional tobacco products who are switching to e-cigarettes and vaping, Nerudia believe that the UK Government have the right approach to the regulation of these products.

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We do not believe that additional regulation is required, and are concerned that any attempt to introduce additional regulation will only serve to discourage smokers from switching away from traditional tobacco, harming Government’s attempts to reduce the number of smokers of traditional tobacco products and the associated harm.

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