Further written evidence submitted by
The Independent British Vape Trade Association (ECG0084)

Further to the written evidence the IBVTA submitted on Friday, I feel it important to send the below as an addendum to our evidence.

On the 11th December 2017, the Committee on Toxicity (COT), an independent scientific committee that provides advice to the Food Standards Agency, the Department of Health and other Government Departments and Agencies on matters concerning the toxicity of chemicals, published a statement on heat-not-burn products [1].

Amongst COT’s conclusions were the following points which we feel are of importance to the Select Committee’s inquiry. The COT concludes that, “using heat-not-burn tobacco products involves breathing in a number of compounds of concern, some of which are carcinogens” and that “there will be a risk to health from using heat-not-burn tobacco products.”

The IBVTA’s own emissions data analysis, as presented in the written evidence submitted on Friday, concluded that vaping was one per cent of the risk of smoking and that heat-not-burn products were ten times more harmful than vaping.

At the 2017 E-cigarette Summit, held at the Royal Society, Dr Konstantinos Farsalinos, Onassis Cardiac Surgery Greece, Department of Pharmacology, University of Patras, Greece, presented the results of his own analysis of the comparative risks of vaping compared to smoking and heat not burn [2]. His conclusions matched those of the IBVTA – vaping being one per cent of the risk of combustible tobacco and ten times less harmful than heat not burn products.

Additionally, the COT commented that, “If people perceive e-cigarettes as safe this perception could transfer to heat-not-burn tobacco products, despite a lack of data on which to establish this.” This is a very important statement and why the IBVTA firmly believes the Select Committee should exclude heat-not-burn products from their inquiry into vape products.

As the IBVTA made clear in its written evidence to this inquiry:

**Vaping is not smoking, vape products are not tobacco products, and the overwhelming majority of the European vape industry is free from any control or ownership by the tobacco industry. It therefore follows that vaping must be treated differently under this principle.**

**Despite this, vaping is continually associated with tobacco. It is even regulated as part of the Tobacco Products Directive. This is perverse.**

Continually trying to shoehorn vaping into pre-existing tobacco regulation, rather than developing vape specific legislation, has always resulted in disproportionate and inappropriate regulation, the outcome of which has been bad for the consumer, the independent vape industry, and ultimately public health. If vaping is to achieve its full potential, it needs to be regulated through vape specific regulation.

**Heat-not-burn is a relatively new innovation on behalf of the tobacco industry. Since its arrival, some people, who do not necessarily have the best interests of vapers or**
vaping at heart, have sought to imply that it is similar to vaping in terms of relative harm and that it is essentially another vaping product. It is not. It is a tobacco product, and as the IBVTA’s own analysis and that of others has shown, it is significantly more harmful than vaping. Independent organisations such as ASH and some government departments have made a clear distinction between vaping and heat not burn.

It would be profoundly unhelpful if the Science and Technology Select Committee sought to continue to “muddy the water” by implying some sort of link between vape products and heat not burn products or implied they were part of the same category.

The IBVTA hopes this additional information will be of benefit to the Select Committee’s inquiry. If you have any questions, please do not hesitate to contact me.

As the only trade association in this sector, without any links to the tobacco industry, we would be happy to be called to provide oral evidence.

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