Public comment from the World Vapers' Alliance to the Israeli Department of Public Health and Education

About the World Vapers' Alliance

The World Vapers' Alliance (WVA) amplifies the voices of vapers worldwide and empowers them to make a difference in their communities. Our members are vapers associations and individual vapers from all over the world. More information can be found on www.worldvapersalliance.com.

About this consultation and why the World Vapers' Alliance is responding to it:

The Department of Health and Education invites responses to the Action Plan "Coping with the Damage of Electronic Cigarettes", which promotes changes to the Tobacco Law, including banning vaping flavours, equal taxation for vaping and cigarettes, and questions the lower risk profile of vaping. The World Vapers' Alliance considers almost all of the proposed measures detrimental to public health because, if enacted, this policy could push a large proportion of vapers to the black market back or back to smoking. At the same time, this overregulation will hinder thousands of smokers from switching to less harmful alternatives and contribute to the spread of further misinformation. Thus, these measures would increase the negative health effects of smoking and damage public health.

Therefore, the World Vapers' Alliance participates in this call for evidence and submits this text to the Israeli Department of Health and Education to provide extensive scientific evidence on vaping and harm reduction and explain how the proposals would hurt public health.

How to read this document:

We respond directly to the main concerns and recommendations raised by the National Taskforce, followed by WVA's response on each selected section. We divided the recommendations and concerns into seven broader categories: health effects, youth usage, smoking cessation, vaping flavours, taxation, public policy, and labelling/warnings.

Health Effects

The National Taskforce states that there "is not enough scientific evidence about health effects" and "opinions among experts regarding the "reduced harm" are divided".

Extensive research has demonstrated that, although not completely harmless, vaping is much less harmful than smoking, and well over 100 organizations & government institutions agree.

- Public Health England (2015) found that vaping is 95% less harmful than smoking.
- The Institute of Psychiatry, Psychology and Neuroscience (2022), in the largest literature review of its kind led by King's College London academics, found that *"the use of vaping products rather than smoking leads to a substantial reduction in exposure to toxicants that promote cancer, lung disease and cardiovascular disease."*
- Caruso, Emma & Distefano (2021) successfully replicated three key studies comparing the toxicity of cigarette smoke and vaping and found that vaping possesses "substantially reduced toxicity" compared to smoking.
- Stephens (2018), a researcher at St. Andrews University, showed that the risk of cancer from e-cigarettes compared to that from smoking is less than half a per cent.
- George (2019), a researcher at the University of Dundee, found that smokers who switch to vaping *"demonstrate significant improvement in vascular health."*
- Klonizakis et al. (2021) found that *"e-cigarettes offer similar vascular health benefits to that of NRT (…) at a very early stage in the stop smoking process (3 days)."*
- Kosterman et al. (2022) found that smokers who switch to vaping also tend to pick up other healthier routines and exercise more.
- Mendelsohn et al. (2022) concluded that vaping is a net public health benefit, according to numerous studies: *"The overall benefits of vaping are considerably greater than the harms and are likely to improve public health."*

In summary, there is absolutely no doubt within the scientific community that vaping is less harmful **compared** to smoking and, therefore must be a key element of the national strategy to reduce smoking rates.

Youth Usage

The National Taskforce states that "vaping is a gateway to smoking for young people".

WVA agrees that preventing young people from starting to smoke and use e-cigarettes is an important public health goal, yet it is important to keep vaping products widely available for adult smokers who seek to quit and improve their health. The following literature clearly states that vaping is not a gateway to smoking. For millions of people, it is the opposite: a gateway out of smoking, hence a public health benefit.

- Friedman & Xu (2020) found that “relative to vaping tobacco flavours, vaping non-tobacco-flavoured e-cigarettes was not associated with increased youth smoking initiation”.
- Lee, Coombs & Afolalu (2018) reviewed fifteen studies and concluded that “a true gateway effect in youths has not yet been demonstrated.” They believe factors such as anxiety, parental smoking habits, peer attitudes, and household income must be considered.
- It is also not true that vaping flavours are a leading reason why young people try vaping and similar tobacco and non-tobacco products. Many studies show how other socio-economic and environmental factors are behind teenagers taking up vaping or cigarettes. Factors such as personality traits, genetic predisposition, parental smoking habits, and household income must be considered when determining why teenagers vape or smoke.
- Polosa (2020) summarized the youth use pattern of vaping: “EC use has surged greatly among high school students and young adults over the last decade but fortunately has declined significantly since its peak in 2019. During the same time period, smoking rates have constantly fallen to new low record levels. These trends argue against EC use as a gateway to smoking. Most EC usage is infrequent and unlikely to increase a person's risk of negative health consequences. Furthermore, the majority of EC usage has happened among those who have previously smoked”.

Evidence from other countries:

Evidence from the USA that youth vaping and smoking have decreased rapidly in the last years refutes the idea: “The use of cigarettes and smokeless tobacco decreased more rapidly since 2012 as e-cigarette use began to increase. Smoking and smokeless tobacco use reached historically low levels among adolescents in the US”. Similar evidence can be found in Germany, similarly in the UK, “youth smoking rates are at an all-time low and youth (11-18 year-old) use of e-cigarettes is rare and largely confined to those that already smoke tobacco cigarettes”.

If anything, vaping seems to divert a subset of youth at high risk of cigarette smoking away from smoking. In fact, most teenagers try vaping after they have started smoking, not vice versa.

Smoking Cessation

The National Taskforce states that “there is no strong evidence that vaping helps in smoking cessation.”

There is enough evidence to conclude not only that vaping helps to quit smoking but to say that vaping is one of the most efficient aids to do so. Vaping is a recommended means of quitting for smokers in France, the United Kingdom, Canada, and New Zealand; and it has been key in reducing smoking rates in countries that have an evidence-based approach

towards it, such as in the United Kingdom; where smoking is at an all-time low. Here is the main research about it:

- Hartmann-Boyce et al. (2022), in a meta-review of 78 studies published by the highly regarded healthcare NGO Cochrane, stated that *"there is high certainty evidence that ECs [E-Cigarettes] with nicotine increase quit rates compared to NRT [nicotine replacement therapy] and moderate certainty evidence that they increase quit rates compared to ECs without nicotine."*
- Hajek et al. (2019), a group of researchers from the Health and Lifestyle Research Unit at Queen Mary University, found vaping to be twice as effective for quitting smoking as nicotine replacement therapies.
- Etter & Eissenberg (2015), researchers from the University of Geneva and the Virginia Commonwealth University, found that former smokers who switched to vaping are less dependent on e-cigarettes than long-term users of nicotine gum were dependent on gum.
- The Royal College of Physicians (2016) stated that *"the addiction potential of currently available e-cigarettes is likely to be low. NRT and e-cigarettes may satisfy smokers who are already using nicotine, but they have little appeal for never-smokers."*
- Kasza et al. (2021) found that, in contrast to gums & patches, vaping even helps people with no intention to quit smoking. They also found that daily vapers were eight times as likely as non-vapers to quit and nearly ten times as likely to stop smoking every day.

More than 100 million vapers worldwide aren't just anecdotes; they are compelling evidence that vaping serves as an effective smoking cessation tool. The sheer volume of individuals who have transitioned from traditional cigarettes to vaping underscores the role of e-cigarettes as an alternative and a pathway to reducing harm and quitting smoking altogether. In the realm of public health, where empirical data holds sway, the lived experiences of over 100 million people present an irrefutable case for vaping as a viable harm reduction strategy.

Vaping Flavours

The National Taskforce proposes prohibiting vaping flavours.

Evidence shows that vaping flavours are key for smokers trying to quit. If flavours are banned, it will make it less likely for current vapers to keep away from cigarettes and make it more difficult for smokers to transition in the future. The main evidence about this can be reviewed here:

- Friedman & Xu (2020), researchers from the Yale School of Public Health, associated the use of vaping flavours with a 230% increase in the odds of adult smoking cessation and concluded that: “Adults who vaped flavoured e-cigarettes were more

likely to subsequently quit smoking than those who used unflavored e-cigarettes. (…) Adults who began vaping non-tobacco-flavored e-cigarettes were more likely to quit smoking than those who vaped tobacco flavors."

- EU SCHEER (2021) report concluded that: "To date, there is no specific data that specific flavourings used in the EU pose health risks for electronic cigarette users following repeated exposure."

International evidence also clearly suggests that banning vaping flavours will drive users to the black market or back to smoking, which has been verified by previous experiences. The main evidence about this point can be reviewed here:

- Gravely et al. (2020) surveyed users in Canada, the United Kingdom and the United States and found that, in the case of a flavour ban, 5 out of 10 would get their flavours from the back market or take up smoking again.
- Friedman (2020) analysed the effects of a flavour ban in San Francisco and found that it resulted in rising teenage smoking rates for the first time in decades.
- Rich (2022) analysed the effects of a flavour ban in Massachusetts and concluded that it resulted in higher sales of cigarettes.
- The Tholos Foundation (2022) analysed the effects of a flavour ban in Estonia and found that 60% of vapers kept using them by mixing their own liquids or obtaining them from the black market.
- Siegel & Katchmar (2022) ran a literature review on the evidence of the effects of flavoured E-cigarette bans in the United States and concluded that restrictions on e-cigarette use could lead to adult and youth cigarette use.

This evidence shows that, when banned, a good share of vapers either obtain flavours from the black market, make them at home, or start smoking again. None of these is a better alternative to keeping them legal. In the black market, products do not run safety and quality controls; there are no controls to prevent sales to minors, and products do not pay taxes.

Although flavour use is more often reported in younger age groups, flavours are not just for young users and are definitely not targeted at underage people. Different studies show that flavours are commonly used among regular vapers of all age groups.
In the United States and Canada, it is estimated that around two-thirds of adult vapers use flavours.

In Europe, the latest Eurobarometer on the Attitudes of Europeans towards tobacco and electronic cigarettes shows that almost half (48%) use fruity flavours, and 20% use candy flavours.

Another recent study found that "only 2.1% reported tobacco as the single most often used" flavour.

Taxation

The National Taskforce recommends implementing equal taxation for vaping and cigarettes.

Taxes on vaping are believed by many policymakers to be an instrument capable of reducing vaping use and improving public health. Regardless of this, most evidence shows that tax increases on e-cigarettes lead vapers to take up smoking again.

- Pesko, Courtemanche & Maclean (2020) studied the effects of traditional cigarettes and vaping taxes on the use of both products in the United States and found that higher e-cigarette tax rates increase traditional cigarette use.
- Huang, Tauras & Chaloupka (2014) measured the impact of price and tobacco control policies on the demand for vaping and found consumption to be very responsive to price changes, meaning that policies increasing e-cigarettes retail prices, such as taxes on vaping products, can lead to significant reductions in e-cigarettes sales and increase in smoking. The researchers concluded that a $1 increase in vaping taxes yielded significant reductions in young adults' daily vaping, alongside increases in recent smoking, primarily reflecting greater dual use.
- Cotti et al. (2020) analysed the effects of e-cigarette taxes on tobacco product sales and concluded that vapes and cigarettes are substitute products, suggesting that increases in e-cigarette taxes can lead to increases in tobacco consumption.
- Friedman & Pesko (2022) studied young adults' responses to traditional cigarettes and vaping taxes and found that: *"higher ENDS [vaping] tax rates are associated with decreased ENDS use, but increased cigarette smoking among 18- to 25-year-olds, with associations reversed for cigarette taxes."*
- Abouk et al. (2023) studied the unintended consequences of e-cigarette taxes on youth tobacco use and concluded: "we estimate sizable positive cigarette cross-tax effects, suggesting economic substitution between cigarettes and ENDS for youth. (...) We conclude that the unintended effects of ENDS taxation may considerably undercut or even outweigh any public health gains."
- Grace, Kivell & Laugesen (2015) showed that e-cigarettes are potentially substitutable for regular cigarettes and their availability will reduce tobacco consumption and stated that: *"policy makers should consider maintaining a constant relative price differential between e-cigarettes and tobacco cigarettes."*

Applying the same tax structure to cigarettes and vaping products is not just financially misguided; it's a detriment to public health. A risk-based taxation system is essential for differentiating between the well-documented harms of smoking and the reduced risks associated with vaping. Equal taxation would unfairly penalise those trying to quit through vaping, potentially steering them back towards combustible cigarettes. Thus, a one-size-fits-all taxation approach contradicts the harm reduction principles and actively undermines public health objectives.

Concluding remarks

The World Vapers Alliance welcomes the goal of the National Taskforce to reduce Israel's smoking rate to below 5% by 2035. However, we are concerned that the proposed measures won't get us there with measures such as flavour bans, equal taxation for cigarettes and vaping products, and scepticism regarding vaping's effectiveness for smoking cessation.

Instead of relying on punitive tactics, Israel should look to the successful model set by Sweden, THE anti-smoking champion. Sweden is on track to become smoke-free by embracing a multi-pronged harm reduction strategy that includes vaping, snus, and nicotine pouches. Sweden's consumer-friendly approach respects individual choice while allowing safer alternatives, a formula that has proven effective in reducing smoking rates. If Israel truly wants to reach its laudable public health objectives, it would be wise to learn from Sweden's effective, science-backed strategy.