



Public submission from World Vapers' Alliance to the Ministry of Health of the Republic of Uzbekistan

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 Ministry of Health of the Republic of Uzbekistan's [draft bill](#) on amendments and additions to certain legal acts of the Republic of Uzbekistan regarding prohibition of circulation and liability for tobacco and nicotine devices, electronic cigarettes and tobacco heating systems, including certain types of tobacco products aims to ban the import, production, sale and use of vaping and heated tobacco products.

The World Vapers' Alliance believes that the ban will negatively affect public health by deterring and preventing the more than 2.5 million smokers in the country from switching to less harmful nicotine alternatives. It also raises concerns about the state of human rights in the country by violating the rights to health and free development of the personality of Uzbeks and turning users into criminals.

The World Vapers' Alliance is participating in this consultation to provide scientific evidence on vaping and the public health effects of the ban.

World Vapers' Alliance response to the consultation

The ban is founded on erroneous beliefs and WVA expects it to have a very adverse impact on public health. While the draft bill aims to “*create a healthy lifestyle among the population, especially young people, and in particular to limit the distribution and consumption of tobacco products*”, it fails to consider the public health potential benefit of safer nicotine products and the unintended consequences of the prohibition. Both the idea that banning healthier ways to consume nicotine that could help the 2.5 million smokers in the country live healthier lives and the belief that the ban will limit the distribution and consumption of vaping and heat-not-burn products are wrong.

Vaping is [95%](#) less harmful than smoking as well as the most effective smoking cessation method. Although not entirely risk-free, the lack of combustion and the carcinogenic components found in traditional cigarettes make it a preferable method of nicotine consumption compared to smoking. Well over a hundred organisations and government institutions agree, as shown in this [list](#) compiled by [The Safer Nicotine Wiki](#).

Its lesser harm is explained by the difference in constituents compared to cigarettes and the absence of combustion. According to [King's College London](#), the exposure to toxicants that promote cancer, lung disease and cardiovascular disease in the use of vaping products is substantially lower than that of smoking. This translates into a significantly reduced risk of cancer (a lifetime excess cancer risk of [0.0095%](#), only 0.4% of that from smoking), [substantial improvements](#) in cardiovascular health and even a [higher probability](#) of picking up healthier routines and exercising when switching.

These features of e-cigarettes make them an ideal tobacco harm reduction product, making vaping one of the most efficient methods for quitting smoking. According to the [Royal College of Physicians](#): “*they can in principle deliver a high dose of nicotine, in the absence of the vast majority of the harmful constituents of tobacco smoke.*” In this regard, the highly regarded healthcare NGO Cochrane, in a [review](#) of 78 trials with 22,052 participants, concluded that “*there is high-certainty evidence that ECs with nicotine increase quit rates compared to NRT and moderate-certainty evidence that they increase quit rates compared to ECs without nicotine.*” Researchers at Queen Mary University's Health and Lifestyle Research Unit, in a [clinical trial](#) of nearly 900 smokers, quantified this difference and concluded that vaping is twice as effective as traditional nicotine replacement therapies in quitting smoking.

As a result, vaping has a net positive effect on public health via reducing smoking rates, according to this [review](#) of the scientific literature. In summary, vaping can help millions of Uzbeks quit smoking and improve their health. In turn, it would reduce the costs of treating smoking-related diseases borne by the national public health system.

Similarly, while containing tobacco, heat-not-burn (HnB) products have been found to be [considerably less harmful](#) than traditional cigarettes due to the lack of combustion. In Japan, they have also proven to be a good tool for smokers to quit traditional cigarettes. Due to their introduction and popularization in the country, cigarette sales plummeted by 43% within only five years (2016-2021). More and more people in Japan are rejecting cigarettes and choosing less harmful alternative products such as heat-not-burn. The HnB rate in Japan is currently at about 4.5%, and the Health and Nutrition Survey found that 76% of HnB users were not smoking cigarettes at all anymore.

However, the ban promotes the belief that vaping and the use of heat-not-burn products is as bad or worse than smoking, discouraging millions of smokers from switching to less harmful alternatives. Approximately [10.6%](#) of adult Uzbeks are current smokers, which amounts to around 2.5 million people, and near 19,000 people die every year from smoking related illnesses in the country. The implementation of tobacco harm reduction policies that encourage smokers who are unable to quit or who do not want to stop using nicotine to do so in a safer way can be of great benefit to public health and help reduce both the smoking rate and the number of smoking related deaths. This approach is already being implemented in countries like [France](#), the [United Kingdom](#), [Canada](#), and [New Zealand](#) – where vaping is a recommended means of quitting for smokers – with great success.

The ban goes in the exact opposite measure by making smokers believe these products are more harmful than smoking while keeping traditional cigarettes available. Moreover, the ban is expected to drive products and users to the black market, increasing the health risk of the products and potentially damaging public health further.

Vaping and/or heated tobacco products are currently banned in several countries such as Argentina, Australia, Brazil, Mexico, Panama, Thailand or Venezuela. Despite the ban, the illicit trade in these products has soared in recent years and the authorities have been unable to curb it. In these black markets, products are not subjected to quality and safety controls, and the ingredients of vape liquids are unknown, making them potentially dangerous. In addition, the products fail to pay taxes and are sold to minors without any kind of control - this being one of the things the draft law aims to prevent.

As a result, we expect the prohibition in Uzbekistan to prevent some smokers from quitting while leading others to the black market, establishing potential risks for public health, putting minors in danger and fostering illegal trade and criminal organisations.

Instead of enforcing a ban that is doomed to fail, the Uzbek government should opt for smart regulation that curbs underage consumption and allows adult smokers access to safe and affordable products.

To improve public health and reduce underage vaping, Uzbekistan should adopt a smart, risk-based regulation, a regulation based on both scientific evidence and successful government-backed policies such as those implemented in [Sweden](#) and the United Kingdom. The World Vapers' Alliance suggests the Uzbek government to consider the following measures:

- **A clear commitment to the concept of harm reduction:** The goal of harm reduction is to reduce adverse consequences among persons who continue to use unhealthy products. Instead of idealized goals, such as the quit or die approach, harm reduction puts practical solutions center stage. This approach has proved to be effective and is accepted in many countries. Uzbekistan should follow this approach and reject bans preventing smokers from switching to less harmful alternatives.
- **Encourage current smokers to switch to vaping and similar less harmful products:** Like the governments of France, the United Kingdom, Canada, and New Zealand; Uzbekistan should assist smokers in their effort to quit by promoting vaping as less harmful alternatives to cigarettes.

- **Guarantee access to vaping products and flavours for adults:** It is essential that affordability and variety are ensured. One-fits-all solutions do not work, so adults need to be provided with a wide variety of options to choose what suits them best. This does not only include vaping products with different levels of nicotine concentration and flavours, but also other safer nicotine products such as heated tobacco products, snus and nicotine pouches.
- **Protect minors adequately:** Preventing the growth of a black market where minors have easy access to products is the best way to prevent them from vaping. In the legal market, age verification processes should be implemented and dissuasive penalties established to prevent the sale of products to minors. Additionally, greater control can be achieved via a specialized shops licensing system.
- **Risk-based regulation and taxation:** A modern, open, risk-based regulatory framework focused on tobacco harm reduction should be implemented. Vaping is not smoking and must not be treated the same. Since vaping is less harmful than smoking, it should be less strictly regulated and taxed less than cigarettes.

WVA's conclusion remarks:

Vaping has been proven to be substantially less harmful than smoking and a great tool to quit smoking. Therefore, we urge the Uzbek authorities to consider all the evidence supporting vaping as a smoking cessation tool, reject the ban of vaping and heat-not-burn products and take the necessary measures to make them available for adult smokers while away from minors.

A comprehensive review of the literature can be found in our Vaping and Harm Reduction Factsheet here: <https://worldvapersalliance.com/harm-reduction-vaping-fact-sheet/>

For any questions or comments, please contact the submitter of the response.