

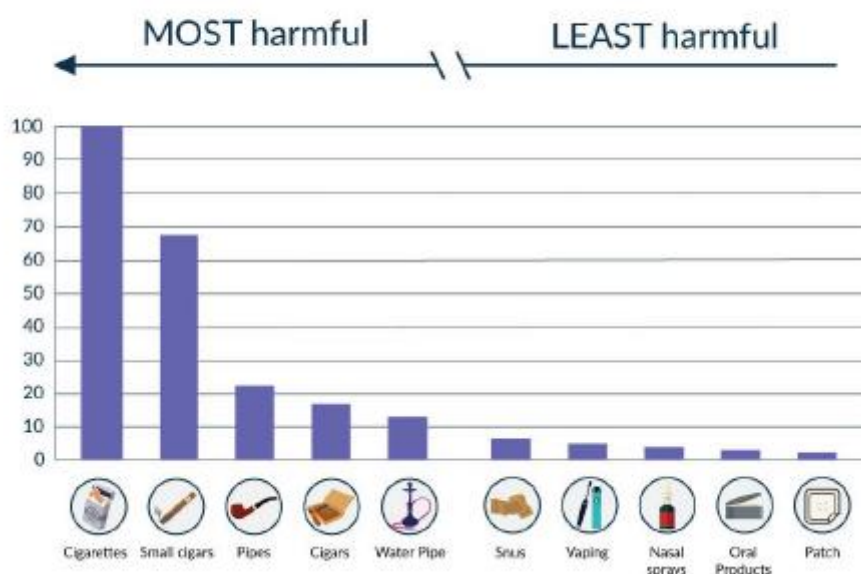
## World Vapers' Alliance open letter to the Kenyan Ministry of Health

The graphic warnings on vaping products and nicotine pouches proposed by the Kenyan Ministry of Health are misleading and fail to recognise the differences in health risks between products, potentially jeopardising harm reduction efforts in the country.

The proposal, that would require vaping products and nicotine pouches to include combined graphic and text health warnings occupying 30% of the front and 50% of the back of their packaging, along with a message indicating that the products are “not a safe alternative to cigarettes”, fails to acknowledge significant differences in the relative health risks associated with each product, such as the fact that vaping is [95% less harmful](#) than smoking and thus a preferred, safer alternative. The same is similarly true for nicotine pouches, which have been shown to pose a [similar level of risk](#) as traditional nicotine replacement therapies.

The imposition of the same graphic warnings as those on traditional cigarette packs may appear to make smokers believe that vaping and using nicotine pouches is as or more harmful than smoking, effectively discouraging them from switching to alternatives that are less harmful to their health and that can contribute to the improvement of public health in Kenya.

### Nicotine Products Risk Continuum



Based on the scientific evidence, we call on the Kenyan Ministry of Health to reconsider its approach and to label products on their health risk relative to that of traditional cigarettes and their use for smoking cessation. We believe it is of the utmost necessity that the ministry ensures that smokers and users of other nicotine products are provided with accurate information and are not led to make decisions based on false beliefs.

For more information on the health effects of vaping and its effectiveness in smoking cessation, we include below a paragraph with the main scientific evidences on the subject. We also provide a guideline on how vaping and other nicotine products should

be regulated in order to improve public health and maximize the number of smokers switching to less harmful alternatives.

### Vaping and its public health implications

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.

As a product targeted at nicotine users, its risk should be addressed in comparison to that of traditional cigarettes. 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, 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.

These findings - the relatively low risk of vaping and its effectiveness as a smoking cessation tool - should be considered pragmatically by policy makers. In a context of nicotine dependence among smokers, the quit or die approach is bound to fail. However, the implementation of tobacco harm reduction policies that enable 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. 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.

### A risk-based regulation

To improve public health and reduce underage vaping, Kenya should adopt a smart, risk-based 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 following approaches be followed:

- **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, harm reduction puts practical solutions center stage. This approach has proved to be effective and is accepted in many countries.

- **Encourage current smokers to switch to vaping and similar less harmful products:** Like the governments of France, the United Kingdom, Canada, and New Zealand, Kenya 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 quit 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:** Putting an end to the black market where minors access 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.

### **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](http://www.worldvapersalliance.com)

### **Concluding remarks**

In our submission, we attach the World Vapers' Alliance Harm Reduction & Vaping Factsheet, which includes an extensive review of the literature on e-cigarettes and a guide to an effective, public health-improving regulatory framework.

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