



Public submission from the World Vapers' Alliance to the Danish Government

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 <http://www.worldvapersalliance.com/>

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

The Danish Government's [draft Act](#) amending the Act on tobacco puts smoking cessation efforts at risk by severely restricting less harmful nicotine products that are alternatives to traditional cigarettes. Among the proposals put forward are to ban flavors in e-liquids and nicotine pouches.

The World Vapers' Alliance participates in this consultation to provide scientific evidence and comments on the proposed restrictions and their potential impact on public health to the Danish Government.

How to read this document:

We respond to each of the main regulatory changes presented in the draft Act separately.

Banning vaping flavours: The draft Act prohibits the import, purchase, supply, receipt, manufacture, processing and possession of electronic cigarettes and refill containers with nicotine that have a characterising flavour other than one of menthol or tobacco, or which exceed the limit of 20 mg/ml nicotine in a nicotine-containing liquid.

WVA's response:

While the ban on products with nicotine concentrations above 20mg/ml is a transposition of the European [Tobacco Products Directive](#) that Denmark is obliged to do, the ban on vaping flavours – which was already enacted by Denmark in April 2022 but is now being repromulgated – is an overly strict measure that is making it difficult for many vapers to stay away from cigarettes and for many smokers to switch to this [95% less harmful](#) form of nicotine consumption.

E-cigarette flavours are not only instrumental in helping smokers switch, but also ensure that they do not return to cigarettes. 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 fruit flavours are the most popular among all vapers. Another recent [study](#) found that "only 2.1% reported tobacco as the single most often used" flavour.

The popularity of vaping flavours among adults is due to the fact that it allows users to not only enjoy the experience of vaping, but to forget about the taste and smell of tobacco, which helps them to stay away from the old habit of smoking. According to Yale School of Public Health, flavoured vaping devices are associated with an [230% increase in the odds of adult smoking cessation](#). Similarly, [Friedman, A.S. et al](#) found that "Adults who vaped flavoured e-cigarettes were more likely to subsequently quit smoking than those who used unflavored e-cigarettes" and "adults who began vaping non-tobacco-flavoured e-cigarettes were more likely to quit smoking than those who vaped tobacco flavours".

On the other hand, experiences of recent flavour bans have shown that their impact on public health is negative, as they not only make it more difficult for more smokers to switch to vaping, but also push many vapers back to smoking or to getting their flavoured liquids on the black market or making them themselves. The University of Waterloo found that [5 out of 10 of vapers would turn to illegal sources to buy flavoured devices or would go back to smoking cigarettes](#). Flavour bans run the risk of increasing tobacco consumption and cancer incidence by limiting smoking cessation and forcing vapers back to smoking cigarettes. A [flavour ban in San Francisco](#) resulted in rising smoking rates among teenagers for the first time in decades, while [a flavour ban in Massachusetts](#) resulted in higher sales of cigarettes. Similarly [a flavour ban implemented in Estonia](#) in 2020 led to 60% of vapers mixing their own liquids or obtaining them from the black market without any quality or safety control. Surveys in [Germany](#), Denmark, [Slovenia](#), Estonia, the [Netherlands](#) and [Sweden](#) show similar.

The experience of the Danish ban has so far been similar to that of the above-mentioned countries. A [Tholos Foundation 2023 report](#) has shown that popular support for the ban was very low, with only 16% of vapers supporting it and almost half of them opposing it, and shows that 80% of Danish vapers vape for health reasons such as quitting smoking or reducing their

tobacco consumption, and 81% consider flavours important. The results of the ban were similar to those of other countries: almost 50% still find the banned flavours in local shops and 47% buy them online. 93% of Danish vapers say it is easy to find banned flavours and only slightly over 50% have the impression that the flavour ban is enforced. In short, the ban created a vaping flavours black market and failed to achieve its objectives.

Additionally, the EU's [SCHEER report](#) recently concluded: *"To date, there is no specific data that specific flavourings used in the EU pose health risks for electronic cigarette users following repeated exposure."*

In summary, flavours increase the likelihood of quitting smoking significantly, making vaping a much more effective harm reduction tool when combined with flavours other than tobacco. [Flavours save lives](#) and it is crucial that they are kept available so that smokers can switch and consume nicotine in a much less harmful way. We therefore urge the Danish government to revert all flavour bans and make sure as many options as possible are kept available for adults.

Banning flavoured nicotine pouches: The draft Act similarly prohibits all flavoured nicotine pouches except tobacco and menthol.

WVA's response:

Similarly, as with vaping flavours, the proposed ban on flavoured nicotine pouches—excluding tobacco and menthol—presents a similarly overly restrictive measure that could derail smoking cessation efforts. Nicotine pouches, as the newest smoking alternative, are not yet adequately regulated in many countries. Used similarly to snus but containing nicotine powder instead of tobacco leaf, they often face regulatory extremes—either unregulated, entirely banned, or treated the same as cigarettes, none of which are optimal.

Like in vaping, flavours in nicotine pouches significantly enhance their appeal help smokers' transition away from cigarettes. The variety of flavours plays a crucial role in disassociating users from the taste and smell of tobacco, which is vital for preventing relapse into smoking habits.

Research, such as that by [Azzopardi, Liu & Murphy \(2022\)](#), indicates that nicotine pouches are the least harmful nicotine alternative compared to smoking and have a risk profile similar to conventional nicotine replacement products like gums or patches. Furthermore, studies by [Lunell et al. \(2020\)](#) and estimates by [Lee, Fry & Ljung \(2022\)](#) demonstrate their effectiveness as a smoking cessation tool and their potential to reduce smoking-related deaths significantly.

As with vaping, the variety in nicotine pouch flavours is not primarily aimed at attracting new, young users but is pivotal for adult smokers seeking harm reduction options. Restrictive flavour policies, as explained above, often do not effectively curb youth initiation to nicotine products, but risk enhancing it. They lead to unintended consequences like the growth of black markets where safety and quality controls are absent, potentially endangering consumers.

Similarly as with the ban on vaping flavours, where a significant portion of consumers continues to access banned flavours through the black market, we can expect this to happen in the Danish nicotine pouches market.

WVA's conclusion remarks:

Vaping and using nicotine pouches have been proven to be substantially less harmful than smoking and an efficient way to quit smoking, with flavours playing a vital role in the process. Therefore, we urge the Danish Government to consider all the evidence and establish the necessary measures to keep vaping and nicotine pouches (including all flavours) available for adult smokers.

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