Open Letter to the Government of Belgium

Urgent Call to Reconsider the Proposed Ban on All Vape Flavours

To the Government of Belgium,

We, the undersigned consumer organisations representing thousands of citizens across Europe, urge the Government of Belgium to reconsider the proposed ban on all flavoured vape liquids.

The restriction proposed by Health Minister Frank Vandenbroucke and discussed by the Belgian Council of Ministers on 27 February would limit e-liquids exclusively to tobacco flavour and authorise only a "positive list" of 16 specific flavouring substances. While the objective of protecting youth from nicotine use is legitimate and important, this measure is likely to produce unintended and counterproductive consequences for adult smokers.

Youth protection can and should be achieved through strict enforcement of age restrictions and responsible retail monitoring. However, eliminating flavours risks undermining smoking cessation efforts and may push adult consumers back to combustible cigarettes or towards illicit markets.

Flavours Help Smokers Quit

Across the European Union, adult vapers predominantly use non-tobacco flavours. Fruit and sweet flavours are the most popular among adult vapers (68%), followed by tobacco (38%) and menthol (31%). This demonstrates that flavours play a significant role in helping smokers transition away from combustible tobacco. Evidence further shows that adults using flavoured e-cigarettes have 230% higher odds of quitting smoking compared to those using tobacco-flavoured or non-flavoured alternatives. Removing these options would reduce the appeal and effectiveness of vaping as a harm reduction tool.

Protecting youth is essential. However, restricting adult access to products that support smoking cessation risks jeopardising public health progress. A balanced approach is needed - one that protects minors without punishing adults who are actively trying to quit smoking.

Illicit Trade and Counterproductive Effects - A Dutch Warning

Flavour bans have repeatedly shown unintended consequences. Belgium can observe developments in the Netherlands, where, following the implementation of a flavour ban, demand did not disappear — it shifted. A significant proportion of consumers now obtain products through informal channels, including social media and cross-border purchases.

Most worryingly, one year after the implementation of the flavour ban, the **smoking rate increased by 4% AND the vaping rate increased by 25% among adolescents**.

When legal, regulated products are removed from the market, consumers may turn to unregulated and potentially unsafe alternatives. This undermines European safety standards and makes enforcement more difficult.

Survey data indicate that almost 5 in 10 vapers would either return to smoking or seek flavoured products on the black market if such products were banned. These outcomes would directly contradict the public health objectives the legislation seeks to achieve.

Call to Action

More than two million adults in Belgium smoke. Policies that weaken harm reduction strategies risk slowing down smoking cessation efforts and driving consumers towards illicit trade.

We respectfully propose the following:

- **Withdraw the currently proposed ban on all flavours.**
- **Maintain legal access to regulated flavoured products for adults.**
  - **Legalize nicotine pouches**
- **Enforce strict age verification and compliance controls in licensed vape shops.**
- **Provide evidence-based public information campaigns aimed both at preventing youth uptake and supporting adult smokers who wish to quit.**

Countries such as the United Kingdom, Sweden, and New Zealand have demonstrated that harm reduction strategies can significantly reduce smoking rates while maintaining youth protections.

More scientific evidence can be found here.

If the proposed legislation passes, it risks increasing illicit trade and undermining both adult cessation efforts and youth protection goals. We urge the Government of Belgium to reconsider this proposal and adopt evidence-based policies that genuinely reduce smoking and protect public health.

Sincerely,

APORVAP (Portugal)

https://aporvap.pt/

APORVAP
Associação Portuguesa de Vaporizadores

CROHM (Croatia)
https://crohm.hr/

CROHM
UDRUGA KORISNIKA OSOBNIH ISPARIVAČA

Considerate Pouchers
https://consideratepouchers.org/

CONSIDERATE POUCHERS

Consumer Choice Center (Global)
https://consumerchoicecenter.org/

CONSUMER CHOICE CENTER

Generacija brez dima (Slovenia)
https://www.facebook.com/gbdslo

GENERACIJA BREZ DIMA

Generaze Bez Koure (Czech Republic)
https://www.generacebezkoure.cz/

Greek Vapers Alliance (Greece)

https://greekvapersalliance.gr/

World Vapers' Alliance (Global)
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