MRC/CSO Social and Public Health Sciences Unit Consultation Response

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<th>Title of consultation</th>
<th>E-cigarettes inquiry</th>
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<td>Name of the consulting body</td>
<td>House of Commons Select Committee: Science and Technology Committee</td>
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Why did the MRC/CSO Social and Public Health Sciences Unit contribute to this consultation?

The MRC/CSO Social and Public Health Sciences Unit at the University of Glasgow is an interdisciplinary group of sociologists, anthropologists, psychologists, epidemiologists, geographers, political scientists, public health physicians, statisticians, information scientists, trial managers and others. The Unit receives core-funding from the Medical Research Council and the Scottish Government Chief Scientist Office, as well as grant funding for specific projects from a range of sources. We conduct research to understand the determinants of population health and health inequalities, and to develop and test interventions to improve health and reduce inequalities, using a wide variety of methods including qualitative research, the collection, linkage and analysis of social survey and routinely collected data, evidence synthesis, randomised controlled trials and natural experimental studies. This response has been informed by our research on social and public health broadly, and on e-cigarettes specifically. This consultation fits with the Unit’s aim of working with decision makers to identify interventions and policies that can have an effective and sustained impact on population health and wellbeing.

Our consultation response

The Committee is seeking written submissions on the health, regulatory and financial implications of e-cigarettes that address the following points:

On health implications of e-cigarettes:

- The impact on human health of e-cigarettes—themselves and relative to ‘conventional’ smoking—and any gaps in the science knowledge-base in this area.
- The benefits and risks of e-cigarettes as a ‘stop smoking’ tool, any gaps in the knowledge-base on this, and whether any approaches are needed to tackle e-cigarette addiction.
- The uptake of e-cigarettes among young people and evidence on whether e-cigarettes play a role in ‘re-normalising’ smoking.
Our response

E-cigarettes may be useful to help people stop smoking, and smokers should be encouraged to use e-cigarettes instead of tobacco cigarettes. While there is strong evidence that e-cigarettes are less harmful than tobacco cigarettes - Public Health England endorsed an estimate that e-cigarettes are 95% safer than tobacco (McNeill et al, 2015) - the evidence base on the full extent of harms associated with e-cigarettes is incomplete at present and will take time to develop as the effects of long-term use will not be apparent until people having been using them for many years. One recent small study did find physiological evidence of lung damage among e-cigarette users, and while much of this was similar to the lung damage among smokers and may have been attributable to the e-cigarette users’ prior use of cigarettes, there were some aspects of lung damage that were unique to e-cigarette users (Reidel et al, 2017). Therefore, we would remain cautious about long-term use of e-cigarettes.

High quality evidence suggests that e-cigarettes can be an effective tool for smoking cessation (Villanti et al, 2017). However, an issue of concern is people 'dual using' both e-cigarettes and tobacco cigarettes, which does not allow smokers to reap the significant health benefits associated with stopping the use of tobacco cigarettes completely. Evidence suggests that up to 75% of e-cigarette users use both e-cigarettes and tobacco cigarettes (Pearson et al, 2012).

The restriction of young people's overall intake of nicotine – be it from e-cigarettes or tobacco – is itself an important goal. While nicotine is not severely harmful for adults when used in the absence of other chemicals contained within tobacco cigarettes, there is evidence that exposure to nicotine – even on its own – may increase the risk of developing psychiatric disorders and can lead to impaired brain development in adolescents with implications for cognitive impairment in later life (Yuan et al, 2015). Additionally, nicotine exposure may prime the brain of adolescents for future substance abuse (Goriounova & Mansvelder, 2012).

The levels of experimentation with e-cigarettes among young people in the UK have grown rapidly in recent years (SALSUS 2015). Recent evidence indicates that the use of e-cigarettes among young people is closely associated with their smoking status, with non-smokers much less likely to try or regularly use e-cigarettes than smokers at the present time (Bauld et al, 2015; Bauld et al, 2017). For example, 91% of 15 year old smokers had tried an e-cigarette, and 24% used e-cigarettes regularly. In comparison, 24% of 15 year old non-smokers had tried an e-cigarette, and only 1% used e-cigarettes regularly (SALSUS 2015). Given the close associations between cigarette and e-cigarette use we caution against jumping to conclusions about so called ‘gateway effects’ (i.e. that e-cigarette use leads to cigarette use). Even where there is longitudinal evidence of use of e-cigarettes preceding use of cigarettes from observational studies, this may be because there are common causes of both that have not been measured or adjusted for (Green & Hilton, 2017).

Further evidence indicates that, while experimentation with e-cigarettes is common among young people, (Bauld et al, 2015) it is not currently leading to regular use (Bauld et al, 2017). However, ongoing and detailed investigation of trends, rapidly changing devices and social patterning in e-cigarette use among young people is crucial and more knowledge is required on frequency of vaping (Bauld et al, 2017). There remains a need for reliable investigation of the possibility of re-normalisation, through examination of whether trends in tobacco use have changed since the rise of vaping. We have some work currently underway at the MRC/CSO Social and Public Health Sciences Unit to address knowledge gaps relating to social patterning, and renormalisation effects.
On regulatory implications of e-cigarettes:

- Whether there is any regulatory variation between the EU and UK, and across UK nations, and the implications of Brexit on regulation in this area.
- The effectiveness of regulation on the advertising and marketing of e-cigarettes.
- The impact to date of the Tobacco and Related Products Regulations on the vaping industry and on the prevalence of e-cigarettes.
- The safety of e-cigarette devices, and any safety regulation requirements.

Our response

It is not in the interests of public health for those who do not already smoke tobacco to begin using e-cigarettes. The European Union’s Tobacco Products Directive (2014/40/EU) introduced a number of new regulations into the UK: 1) e-cigarettes containing nicotine must carry a health warning; 2) prohibition of cross-border advertising; and 3) prohibition of the sale of higher strength products other than as medicines. In addition, the Advertising Standards Authority (ASA) recently consulted on health claims and public health advertisements for e-cigarettes. Article 5.3 of the Framework Convention on Tobacco Control has been an important landmark in protecting public health.

At the MRC/CSO Social and Public Health Sciences Unit we are currently undertaking research into e-cigarette companies (e.g. their interest and involvement in e-cigarette policy debates) as there is a danger that tobacco companies could be heavily involved. Allowing such companies any opportunities to run advertising and marketing campaigns with messaging about public health should be avoided as these are likely to be counter-productive to the aims of public health.

We believe that it is crucial to have in place effective regulation on the advertising and marketing of e-cigarettes. Any advertisement should display a statement indicating that e-cigarettes are less harmful than tobacco and that the best option for health is to neither smoke tobacco nor vape e-cigarettes. This should be mandatory. It is our view that the regulation of e-cigarette advertising should facilitate their potential contribution to harm reduction – reduction of the harms associated with smoking tobacco cigarettes - at an individual level. Such regulation should also minimise risks at a population level, particularly the risk of non-smokers beginning to use e-cigarettes or current smokers dual using for extended periods. Thus, we suggest that any form of advertising and promotion of e-cigarettes should never be targeted at young people or adult non-smokers, and e-cigarette use should not be promoted as a positive health and lifestyle choice. At the MRC/CSO Social and Public Health Sciences Unit we plan to undertake research examining complaints made to the Advertising Standards Authority (ASA) about e-cigarette marketing and advertising, with the aim of establishing any trends over time in the type and frequency of complaints, advertisers’ responses to complaints, and the ASA’s final adjudications. This research may help to identify developments in e-cigarette marketing, as well as examining the ASA’s implementation of the Committee of Advertising Practice (CAP) and UK Code of Broadcast Advertising (BCAP) Codes of advertising practice.

We are particularly wary of the growing involvement of transnational tobacco companies in the e-cigarette market, given the history of those companies in using various tactics to resist smoke-free policy, and the companies’ likely inclination to subvert advertising rules to further their own interests at the cost of public health. As such, we favour a precautionary approach to regulating the marketing of e-cigarettes that takes into account this history of corporate resistance. It is of note that in our recently published research with teenagers on regulation of e-cigarettes, young people favoured that regulation should take a precautionary approach to
advertising to prevent young non-smokers being attracted to vaping (Hilton et al, 2016). Given the fact that the e-cigarette market is fast changing with new generation products holding some appeal to young people, we believe that a cautious approach is in the best interests of public health. Ongoing research is vital in order to understand the impacts of regulation on the uptake of e-cigarettes and tobacco, particularly by young people, and also cast light on the processes through which regulation affects perceptions of vaping and smoking. A review of the Tobacco Products Directive (TPD) regulation is recommended in light of emerging evidence, and accordingly, we are currently engaged in work to evaluate the impact of this regulation in the UK.

References

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