

5 November 2020

Department of the Senate
PO Box 6100
Parliament House
Canberra ACT 2600

Email: tobaccoharmreduction.sen@aph.gov.au

To the Select Committee on Tobacco Harm Reduction,

Submission: Tobacco Harm Reduction Inquiry

The Consumers Health Forum of Australia (CHF) welcomes the opportunity to provide a submission to the Select Committee's inquiry into tobacco harm reduction and the regulation of electronic cigarettes (e-cigarettes). CHF is the national peak body representing the diverse interests of Australian healthcare consumers and those with an interest in health consumer affairs. CHF works to achieve safe, quality, timely healthcare for all Australians, supported by accessible health information and systems.

Prevention and cessation of smoking has been a remarkable public health achievement in Australia, which CHF believes is attributed to the regulatory and population-based approach of the Tobacco Control Regulations and guidelines. Despite the progress that has been made, 11% of Australians still smoke daily, though this number is continuing to decline.¹ There is a duty of care to regulate products that encourage smoking from being sold and advertised alongside everyday items as the addictive and dangerous nature of these products limits the ability of consumers to make an informed choice. We also need to continue to provide evidence-based smoking cessation programs and supports across the community.

CHF's does not believe e-cigarettes should be deregulated or used as a first line treatment for smoking cessation. With the short-term and long-term effects of these products still inconclusive, we strongly believe they should be treated with caution.

Evidence on the effectiveness of e-cigarettes as a smoking cessation treatment

CHF acknowledges there are some in the community who have found, through personal experience and anecdotal evidence, that e-cigarettes can be an effective strategy for quitting smoking. However, we must also recognise that both the safety of e-cigarettes

¹ Australian Institute of Health and Welfare. (2020). *National Drug Strategy Household Survey 2019*. Drug Statistics series no. 32. PHE 270. Canberra AIHW.

and their alleged superior efficacy in smoking cessation have not been scientifically demonstrated.² While tobacco industry and commercial voices dominate calls for e-cigarettes to be de-regulated and widely used as a harm-reduction alternative to cigarette smoking, we note that the Therapeutic Goods Administration (TGA) has not registered any e-cigarettes as smoking cessation products and has stated that the quality, safety and efficacy of e-cigarettes is unknown.³

Data from the National Drug Strategy Household Survey 2019 shows that while 32% of respondents had tried e-cigarettes to help them quit smoking, significantly more people (54%) said they had tried them out of curiosity.⁴ Additionally, it was concerning to see the health advisory released by the US Centers for Disease Control and Prevention in August 2019, which reported over 200 cases of lung disease across multiple states in patients with a history of recent e-cigarette use.⁵

CHF supports the positions of a range of independent health organisations, including the TGA, the Public Health Association of Australia, Cancer Council Australia, the National Health and Medical Research Council and the World Health Organization, who have all concluded that there isn't enough evidence to make a call on e-cigarettes as safe, or as an effective aid for people to quit smoking.

Evidence on the uptake of e-cigarettes amongst non-smokers and the potential gateway effect

While fewer Australians are smoking daily than ever before, use of e-cigarettes is increasing. Between 2016 and 2019, lifetime use and current e-cigarette use increased for smokers and non-smokers, as did frequency of use. Although more than two-thirds (69%) of electronic cigarette users were smokers when they first tried an e-cigarette, nearly 1 in 4 considered themselves to be a 'never smoker' at the time.⁶

While the data is not yet conclusive, there is some evidence that e-cigarettes could act as a gateway into nicotine addiction or tobacco cigarette smoking. A number of longitudinal studies have reported an association between e-cigarette use in non-smokers and the

² Public Health Association of Australia. (2015). *Statement by the Public Health Associations of Australia on Electronic Cigarettes*. Accessed 28 October 2020, <<https://www.phaa.net.au/documents/item/704>>.

³ Therapeutic Goods Administration. (2019). *Electronic cigarettes*. Accessed 28 October 2020, <<https://www.tga.gov.au/community-ga/electronic-cigarettes>>.

⁴ Australian Institute of Health and Welfare. (2020). *National Drug Strategy Household Survey 2019*. Drug Statistics series no. 32. PHE 270. Canberra AIHW. p10.

⁵ Australian Government Department of Health. (2019, September 13). *E-cigarettes linked to severe lung disease* [press release]. Retrieved from <<https://www.health.gov.au/news/e-cigarettes-linked-to-severe-lung-illness>>.

⁶ Australian Institute of Health and Welfare. (2020). *National Drug Strategy Household Survey 2019*. Drug Statistics series no. 32. PHE 270. Canberra AIHW. p10.

uptake of tobacco cigarette smoking in the future.⁷ There is growing evidence to suggest that e-cigarette use in non-smokers is associated with 'dual use' (using both e-cigarettes and conventional cigarettes).⁸ It is clear that more research is needed, and that concerns about the potential for e-cigarettes to act as a gateway for non-smokers into tobacco smoking cannot be dismissed at this stage.

Impact on youth smoking and vaping rates

To inform this submission, CHF canvassed views from our Youth Health Forum, who advised that vaping is generally seen by young people as a harm reduction tool to reduce the amount they smoke and is used as a tool to help cope with mental health and stress related concerns. We note that there are likely a diversity of views on this topic amongst young health consumers and do not suggest these findings are representative.

The National Drug Strategy Household Survey 2019 found that young adults were more likely to be attracted to e-cigarettes than other age groups, with nearly two-thirds of current smokers and 1 in 5 non-smokers aged 18–24 reporting having tried e-cigarettes.⁹ Younger users were far more likely to report being a never smoker than older users, with 39% of 18–24 year olds in this category compared with less than 10% of people aged 40 and over.¹⁰

Additionally, the potential appeal of flavoured e-cigarettes to children and adolescents is of some concern. This may be a factor driving the rapid uptake of e-cigarettes among adolescents in many countries, though further research on this point is needed. CHF recognises that the regulation of e-cigarettes is an issue of interest and concern for many young people and we believe further engagement with young people is needed to better understand the perceptions and behaviours that exist in relation to e-cigarette use.

**

Overall, CHF believes that there is a need for more research on various aspects of e-cigarettes, including their safety, efficacy as a harm reduction tool and potential to undermine smoking cessation efforts. We support a precautionary approach while there remains a lack of high-quality evidence on the long-term consequences of e-cigarette use.

⁷ National Health and Medical Research Council. (2017). *NHMRC CEO Statement: Electronic Cigarettes (E-Cigarettes)*. Accessed 28 October 2020, < <https://www.nhmrc.gov.au/about-us/resources/ceo-statement-electronic-cigarettes#block-views-block-file-attachments-content-block-1>>.

⁸ Public Health Association of Australia. (2018). *E-cigarettes: Policy Position Statement*. Deakin: PHAA. p3.

⁹ Australian Institute of Health and Welfare. (2020). *National Drug Strategy Household Survey 2019*. Drug Statistics series no. 32. PHE 270. Canberra AIHW. p9.

¹⁰ Ibid. p10.

If you require any further information about this submission, please do not hesitate to contact CHF's Senior Policy Officer Lisa Gelbart on (02) 6273 5444 or l.gelbart@chf.org.au.

Yours sincerely,

A handwritten signature in black ink that reads "Leanne Wells". The signature is written in a cursive, flowing style.

Leanne Wells
Chief Executive Officer