



The Royal Australasian
College of Physicians

This short submission was developed in response to the Tasmanian Department of Health and Human Services' Discussion Paper on E-cigarettes. This consultation was limited to the issue of non-nicotine e-cigarettes.



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College of Physicians

From the President

16 July 2015

[REDACTED]
Public Health Services
Department of Health and Human Services
GPO Box 125
Hobart TAS 7001

Via email: [REDACTED]

Dear [REDACTED]

Discussion Paper - Options for a public health response to electronic cigarettes

The Royal Australasian College of Physicians (RACP) appreciates the opportunity to respond to the Tasmanian Department of Health and Human Services (DHHS) Discussion Paper '*Options for a public health response to electronic cigarettes*'.

The RACP supports controls on the use, sale and promotion of nicotine-free e-cigarettes (electronic non-nicotine delivery systems /or ENNDS) in all Australian states and territories. The level of control should be consistent with the integrity of smokefree legislation.

Smoking remains the largest single cause of death and disease in Australia, with numerous public health campaigns seeking to reduce both take up and maintenance of smoking in the population. The present lack of ENNDS regulation threatens to weaken these efforts and once again normalise smoking.

ENNDS are designed to replicate and glamourise hand-to-mouth smoking behaviour. There are also significant concerns that many ENNDS are sold and promoted using strategies to target non-smokers and the younger generation.

Contrary to the options posed in the discussion paper, tobacco control measures are of less direct relevance to ENNDS because they are not inherently addictive. ENNDS regulation should instead focus on preventing the particular harm at stake, that being normalisation of smoking in the population.

Further, while available research findings on the hazardous chemicals contained in ENNDS are alarming, issues regarding product safety should not cloud early

discussions on regulation. ENDS products deemed 'safe' for the individual user and bystander will still pose a public health risk.

The RACP also puts on record our disappointment that this consultation has been restricted to nicotine-free e-cigarettes. As a result of this restriction, the DHHS has missed an opportunity to conduct a more meaningful consideration of nicotine e-cigarettes, which have far more significant public health implications. The RACP is currently developing a detailed position on nicotine e-cigarettes, with the underlying principle being that these products should be regulated in a manner that represents an overall public health gain.

Thank you for the opportunity to provide input to this consultation. The RACP would welcome the opportunity to engage further on the important issue of e-cigarette regulation in the future. Should you require any further information on this submission, please contact Ritu Mohan, Policy Officer, at [REDACTED]
[REDACTED]

Yours sincerely

Laureate Professor Nicholas J Talley