

6. Which option or options do you think would be the most effective way for the UK Government and devolved administrations to implement restrictions on flavours?

There are a huge amount of flavour descriptors currently on the market which will become illegal with the introduction of regulations restricting flavours to tobacco, mint, menthol and fruits. Consideration of a sell-through period will be important.

9. Do you think non-nicotine e-liquid, for example shortfills, should also be included in restrictions on vape flavours?

Yes

No

Don't know

Please explain your answer and provide evidence or your opinion to support further development of our approach. (maximum 300 words)

Definitely, yes. We have been asking for some time for 0% nicotine products to be included in all regulations for vape products as they currently undermine enforcement.

10. Which option do you think would be the most effective way to restrict vapes to children and young people?

Option 1: vapes must be kept behind the counter and cannot be on display, like tobacco products

Option 2: vapes must be kept behind the counter but can be on display

Please explain your answer and provide evidence or your opinion to support further development of our approach. (maximum 300 words)

Keeping vapes behind the counter would ensure that there is another opportunity for the retailer to assess the age of the customer before selling and it makes sense this would reduce the ease with which a child could purchase a vape. It also makes sense that keeping vapes out of sight in convenience stores and other non-specialist vape shops would reduce the opportunity to promote the products to children recognising that this may also limit the opportunity to promote to adult smokers.

11. Do you think exemptions should be made for specialist vape shops?

Yes

No

Don't know

Please explain your answer and provide evidence or your opinion to support further development of our approach. (maximum 300 words)

Yes, BUT the definition of specialist vape shop needs to be very carefully considered. The definition of specialist tobacconist in the Tobacco Advertising and Promotion Act 2002 is a shop selling tobacco products by retail (whether or not it also sells other things) more than half of whose sales on the premises in question derive from the sale of cigars, snuff, pipe tobacco and smoking accessories. There are many specialist vape shops which only sell vaping products and do provide advice and guidance to customers to ensure they are selecting the right product to support them in quitting smoking. However, there are many others which purport to be other types of shops – such as American candy shops, mobile phone accessory shops – where vape sales probably do contribute more than half of sales and yet they do not merit any relaxing of legislation to protect children

12. If you disagree with regulating point of sale displays, what alternative measures do you think the UK Government and devolved administrations should consider? Please explain your answer and provide evidence or your opinion to support further development of our approach. (maximum 300 words)

Not applicable – CTSI agree that point of sale displays need to be regulated.

13. Which option do you think would be the most effective way for the UK Government and devolved administrations to restrict the way vapes can be packaged and presented to reduce youth vaping?

Option 1: prohibiting the use of cartoons, characters, animals, inanimate objects, and other child friendly imagery, on both the vape packaging and vape device. This would still allow for colouring and tailored brand design

Option 2: prohibiting the use of all imagery and colouring on both the vape packaging and vape device but still allow branding such as logos and names

Option 3: prohibiting the use of all imagery and colouring and branding (standardised packaging) for both the vape packaging and vape device

Please explain your answer and provide evidence or your opinion to support further development of our approach. (maximum 300 words)

CTSI believe that restricting the use of imagery and colouring will help to reduce

17. Are there any other types of product or descriptions of products that you think should be included in these restrictions?

Please explain your answer and provide evidence or your opinion to support further development of our approach. (maximum 300 words)

18. Do you agree or disagree that an implementation period for restrictions on disposable vapes should be no less than 6 months after the law is introduced?

Agree

Disagree

Don't know

Please explain your answer and provide evidence or your opinion to support further development of our approach. (maximum 300 words)

The loophole which enables free distribution of any vape to anyone of any age needs to be closed urgently and we have been calling for this for quite some time.

19. Are there other measures that would be required, alongside restrictions on supply and sale of disposable vapes, to ensure the policy is effective in improving environmental outcomes?

Please explain your answer and provide evidence or your opinion to support further development of our approach. (maximum 300 words)

There are many measures which should be taken to improve environmental outcomes, and these could be taken now. Material Focus (along with ASH UK and CTSI) have highlighted what these should look like:

The development of more effective and accessible recycling schemes for

Powers to issue fixed penalty notices would provide an alternative means for local authorities to enforce age of sale legislation for tobacco products and vapes in addition to existing penalties.

Yes

No

Don't know

Please explain your answer and provide evidence or your opinion to support further development of our approach. (maximum 300 words)

We welcome the addition of fixed penalty notices to our toolkits for dealing with