

MRC/CSO Social and Public Health Sciences Unit Consultation Response

|  |
| --- |
| **Title of consultation** |
| Tightening rules on advertising and promoting vaping products |
| **Name of the consulting body** |
| Scottish Government |
| **Link to consultation** |
| <https://consult.gov.scot/tobacco-control-and-gambling/vaping-products-rules/> |
| **Why did the MRC/CSO Social and Public Health Sciences Unit contribute to this consultation?** |
| At the MRC/CSO Social and Public Health Sciences Unit, we conduct high quality research that has a real impact on health and wellbeing, and on reducing health inequalities – both at home and across the globe. We have a particular focus on developing and using cutting-edge methods to understand how social, behavioural, economic, political and environmental factors influence health. We work with decision makers, practitioners and the public to identify interventions and policies that can have an effective and sustained impact on health and wellbeing, particularly among those most in need. |
| **Our consultation response** |
| **Q1. Do you agree that we should be seeking to limit use of these products as a cessation aid and restrict exposure to non-smokers?**Yes / No / Don’t Know.Evidence from Hilton et al. [1] suggests that youths support the use of e-cigarettes as smoking cessation aids but only for established adult smokers and that they engage with these products differently from adults. Early analysis from Hilton’s current CRUK (PPRCTAGPJT\100003) project shows that the disposable nature of the new range of e-cigarette products coupled with aggressive online social media marketing means that cheap, disposable e-cigarettes are particularly appealing to youths. Taken together with new evidence from a recently published systematic review [2] commissioned by the Australian Government which found that never smokers who use e-cigarettes are around three times more likely to initiate cigarette smoking, provides worrying evidence for the need to limit the use of these products to non-smokers. Weare cautious about suggesting that use of e-cigarettes causes a greater likelihood of smoking. It |

|  |
| --- |
| may simply be that the same young people who are inclined to use e-cigarettes, are also inclined to use cigarettes and would have ended up using cigarettes anyway regardless of vaping. UK evidence up to 2015 indicated that e-cigarette availability had made little discernible impact on the long-term declining trends in youth smoking,[3] as it might have been expected to if there were any strong causal link between the two. Nevertheless, the strong association between e-cigarette use and smoking is present among UK youth [4], and if any portion of this association represent a causal effect on uptake of smoking, then it is concerning that youth from disadvantaged backgrounds who have never smoked are more likely to vape [5].1. Hilton S, Weishaar H, Sweeting H, et al E-cigarettes, a safer alternative for teenagers? A UK focus group study of teenagers' views BMJ Open 2016;6: e013271. doi: 10.1136/bmjopen-2016-013271
2. Banks E, Yazidjolou A, Brown S, et al. Electronic cigarettes and health outcomes: systematic review of global evidence. Report for the Australian Department of Health National Centre for Epidemiology and Population Health, Canberra; April 2022. [https://openresearch-](https://openresearch-repository.anu.edu.au/handle/1885/262914) [repository.anu.edu.au/handle/1885/262914](https://openresearch-repository.anu.edu.au/handle/1885/262914)
3. Hallingberg B, Maynard OM, Bauld L, et al Have e-cigarettes renormalised or displaced youth smoking? Results of a segmented regression analysis of repeated cross sectional survey data in England, Scotland and Wales Tobacco Control 2020;29:207-216.
4. Green, M.J., Gray, L. & Sweeting, H. Youth vaping and smoking and parental vaping: a panel survey.

BMC Public Health 20, 1111 (2020). https://doi.org/10.1186/s12889-020-09228-w1. Green, M.J., Gray, L., Sweeting, H. et al. Socioeconomic patterning of vaping by smoking status among UK adults and youth. BMC Public Health 20, 183 (2020). [https://doi.org/10.1186/s12889-020-](https://doi.org/10.1186/s12889-020-8270-3) [8270-3](https://doi.org/10.1186/s12889-020-8270-3)

**Q2. Do you agree with proposal to extend restrictions on advertising these products in the ways described above?**Yes / No / Don’t KnowThere is an abundance of evidence that advertisements placed at outdoor public transport stops are one type of advertising through which particular groups in society may be targeted and that this can drive health inequalities. One Australian study has found that more unhealthy products were advertised in deprived neighbourhoods [1]. Recent research found that “children who resided within more deprived areas had greater contact with the transport network and also greater exposure to unhealthy food and drink product advertising, compared to those livingin less deprived areas” [2, p.1]. Other studies have shown that greater neighbourhood |

|  |
| --- |
| availability of tobacco retailing to be associated with a higher propensity to smoke [3-5] or a lower likelihood of continuous abstinence from smoking [5,6].We believe there to be over-lap between advertising that youths are exposed to and advertising that parents are exposed to. Furthermore, restricting advertising on vaping products that youths may be exposed to may restrict the advertising of e-cigarettes as a smoking cessation to their parents and research has shown that parental smoking is one of the strongest predictors of youth smoking [7,8].Based upon the above evidence we suggest a balanced approach.1. Settle, P, Cameron, A & Thornton, L (2014) Socioeconomic differences in outdoor food advertising at public transit stops across Melbourne suburbs. Austr N Z J Public Health 38, 414–418
2. Jonathan R. Olsen, Chris Patterson, Fiona M. Caryl, Tony Robertson, Stephen J. Mooney, Andrew G. Rundle, Richard Mitchell, Shona Hilton, Exposure to unhealthy product advertising: Spatial proximity analysis to schools and socio-economic inequalities in daily exposure measured using Scottish Children's individual-level GPS data, Health & Place, Volume 68, 2021, 102535, ISSN 1353-8292, [https://doi.org/10.1016/j.healthplace.2021.102535.](https://doi.org/10.1016/j.healthplace.2021.102535)
3. Chuang, YC, Cubbin, C, Ahn, D, Winkleby, MA, Effects of neighbourhood socioeconomic status and convenience store concentration on individual level smoking. J Epidemiol Commun Health. 2005; 59 (7 ): 568 – 573. doi: 10.1136/jech.2004.029041.
4. Pearce J Hiscock R Moon G Barnett R. The neighbourhood effects of geographical access to tobacco retailers on individual smoking behaviour. J Epidemiol Community Health. 2009; 63 (1): 69 – 77 . doi: 10.1136/jech.2007.070656.
5. Jamie Pearce, PhD, Esther Rind, PhD, Niamh Shortt, PhD, Catherine Tisch, MSc, Richard Mitchell, PhD, Tobacco Retail Environments and Social Inequalities in Individual-Level Smoking and Cessation Among Scottish Adults, Nicotine & Tobacco Research, Volume 18, Issue 2, February 2016, Pages 138– 146, <https://doi.org/10.1093/ntr/ntv089>
6. Reitzel LR Cromley EK Li Y et al. The effect of tobacco outlet density and proximity on smoking cessation. Am J Public Health. 2011; 101 (2 ): 315 – 320 . doi: 10.2105/AJPH.2010.191676 AJPH.2010.191676 [pii].
7. Mays D, Gilman SE, Rende R, Luta G, Tercyak KP, Niaura RS. Parental smoking exposure and adolescent smoking trajectories. Pediatrics. 2014;133(6):983-991. doi:10.1542/peds.2013-3003
8. Joana Alves, Julian Perelman, Victoria Soto-Rojas, Matthias Richter, Arja Rimpelä, Isabel Loureiro, Bruno Federico, Mirte A.G. Kuipers, Anton E. Kunst, Vincent Lorant, The role of parental smoking on adolescent smoking and its social patterning: a cross-sectional survey in six European cities, Journal of Public Health, Volume 39, Issue 2, June 2017, Pages 339–346, https://doi.org/10.1093/pubmed/fdw040
 |

|  |
| --- |
| **Q3. Do you agree with proposal that in-store promotional displays should be banned?**Yes / No / Don’t KnowDisplays of tobacco products (e.g., cigarettes, loose tobacco and heated tobacco) at point of sale (POS) in retail stores are banned in many countries [1]. Between 2001 and 2016, 20 countries implemented tobacco POS display bans [2]. In 2016, the European Union (EU) Tobacco Products Directive introduced new regulations for e-cigarette retailers [3], prohibiting in retail stores: (1) additional imagery that is not of the product; and (2) overly descriptive language that describes products in a way that cannot be objectively substantiated [4].However, a ban on e-cigarette POS displays similar to tobacco was not introduced.Exposure to e-cigarette POS displays is associated with increased vaping [5-7]. Exposure to a combination of tobacco and e-cigarette advertising, including in retail stores, is associated with higher odds of current tobacco use in young people, compared with exposure to tobacco advertising alone [8]. Therefore, a balanced approach to e-cigarette sales is required to promote their use as a smoking cessation aid, while avoiding any adverse impacts on non- smokers of product exposure. We believe that the regulatory framework to be the same for vaping products as for tobacco, so it is easier to understand, implement and enforce.1. Brocklebank LA, Blackwell AKM, Marteau TM, et al Electronic cigarette and smoking paraphernalia point of sale displays: an observational study in England Tobacco Control Published Online First: 13 September 2021. doi: 10.1136/tobaccocontrol-2020-056314
2. Robertson L, McGee R, Marsh L, et al . A systematic review on the impact of point-of-sale tobacco promotion on smoking. Nicotine Tob Res 2015; 17:2–17.doi:10.1093/ntr/ntu168
3. MHRA. E-Cigarettes: regulations for consumer products, 2016. Available: <https://www.gov.uk/guidance/e-cigarettes-regulations-for-consumer-products>
4. Department of Health & Social Care. Article 20(5), tobacco products directive: restrictions on advertising electronic cigarettes, 2016. Available: [https://www.gov.uk/government/publications/proposals-](https://www.gov.uk/government/publications/proposals-for-uk-law-on-the-advertising-of-e-cigarettes/publishing-20-may-not-yet-complete) [for-uk-law-on-the-advertising-of-e-cigarettes/publishing-20-may-not-yet-complete](https://www.gov.uk/government/publications/proposals-for-uk-law-on-the-advertising-of-e-cigarettes/publishing-20-may-not-yet-complete)
5. Best C , Haseen F , van der Sluijs W , et al . Relationship between e-cigarette point of sale recall and e-cigarette use in secondary school children: a cross-sectional study. BMC Public Health 2016; 16:310. doi:10.1186/s12889-016-2968-2 pmid: <http://www.ncbi.nlm.nih.gov/pubmed/27075888>
6. Loukas A, Paddock EM , Li X , et al . Electronic nicotine delivery systems marketing and initiation among youth and young adults. Pediatrics 2019;144: e20183601. doi:10.1542/peds.2018-3601 pmid:

<http://www.ncbi.nlm.nih.gov/pubmed/31451608> |

|  |
| --- |
| 1. Pasch KE , Nicksic NE , Opara SC , et al . Recall of point-of-sale marketing predicts cigar and e- cigarette use among Texas youth. Nicotine Tob Res 2018; 20:962–9.doi:10.1093/ntr/ntx237 pmi[d:h](http://www.ncbi.nlm.nih.gov/pubmed/29069425)tt[p://www.ncbi.nlm.nih.gov/pubmed/29069425](http://www.ncbi.nlm.nih.gov/pubmed/29069425)
2. Papaleontiou L, Agaku IT , Filippidis FT . Effects of exposure to tobacco and electronic cigarette advertisements on tobacco use: an analysis of the 2015 National Youth Tobacco Survey. J Adolesc Health 2020; 66:64–71.doi:10.1016/j.jadohealth.2019.05.022 pmi[d:h](http://www.ncbi.nlm.nih.gov/pubmed/31383392)tt[p://www.ncbi.nlm.nih.gov/pubmed/31383392](http://www.ncbi.nlm.nih.gov/pubmed/31383392)

**Q4. Do you support the proposal to make brand-sharing an offence?**Yes / No / Don’t KnowEarly insights from our scoping review, as part of our CRUK project (PPRCTAGPJT\100003), highlighted instances of brand sharing on vaping products on social media (see picture below).Brightly coloured vaping liquids called Len and Jenny's which are similar to Ben and Jerry's ice cream brand.The picture shows vaping liquids called Len and Jenny’s which have distinct flavourings. The branding and flavours are notably similar to the ice cream brand Ben and Jerrys. During discussion groups, youths (aged 11-16) have expressed their interest in experimenting with the products based on the branding and advertised flavouring. Notably, several youths did not pick up on the type of product being advertised (e-liquids), it was not until it was pointed out to them that they realised it was vaping liquids and not miniature ice creams. This is only one example of brand sharing we have found and based on our early insights we support the proposal to make brand sharing an offence.**Q5a. Do you support the proposal to make free distribution of vaping products an offence?**Yes / No / Don’t Know |

|  |
| --- |
| In 2016, U.S. Food and Drug Administration (FDA) issued a regulation referred to as the federal “Deeming Rule” [1]. The Deeming Rule allowed the current regulatory authority to be extended to products not originally covered in the Tobacco Control Act, including e-cigarettes, their specific components or parts (such as atomisers and e-liquids), and other tobacco products (e.g., cigars, hookah and pipe tobacco) [2,3]. Among other provisions (e.g., no sales to minors), this rule prohibited provision of free samples of vaping products [2]. Prior to the Deeming Rule and the Tobacco Control Act, free samples of dangerous tobacco products were easily and freely accessible to youth [4,5].The use of e-cigarettes among adults in England has remained stable since 2015; however, experimentation among young people has increased [6]. Thus, prohibiting free samples of vaping products (in line with the US) may be an important step to help curb initiation rates of e- cigarettes, particularly among youths [7,8].1. U.S. Food and Drug Administration. FDA’s Deeming Regulations for E-Cigarettes, Cigars, and All Other Tobacco Products. https[://www.](http://www.fda.gov/tobacco-products/rules-regulations-and-guidance/fdas-)fda[.gov/tobacco-products/rules-regulations-and-guidance/fdas-](http://www.fda.gov/tobacco-products/rules-regulations-and-guidance/fdas-) deeming-regulations-e-cigarettes-cigars-and-all-other-tobacco-products. Accessed April 2022.
2. U.S. Food and Drug Administration. The Facts on the FDA’s New Tobacco Rule. https[://www.fd](http://www.fda.gov/consumers/consumer-updates/facts-fdas-new-tobacco-rule)a.g[ov/consumers/consumer-updates/facts-fdas-new-tobacco-rule.](http://www.fda.gov/consumers/consumer-updates/facts-fdas-new-tobacco-rule) Accessed April 2022.
3. U.S. Food and Drug Administration. CTP Glossary. https[://www.f](http://www.fda.gov/tobacco-)da[.gov/to](http://www.fda.gov/tobacco-)b[acco-](http://www.fda.gov/tobacco-) products/compliance-enforcement-training/ctp-glossary. Accessed April 2022.
4. U.S. Department of Health and Human Services, Food and Drug Administration, Center for Tobacco Products. The Prohibition of Distributing Free Samples of Tobacco Products: Guidance for Industry; 2017 1-8. [https://www.fda.gov/media/119231/download.](https://www.fda.gov/media/119231/download)
5. S. Yu, P. Escobedo, R. Garcia, et al. A descriptive longitudinal study of changes in vape shop characteristics and store policies in anticipation of the 2016 FDA regulations of tobacco products, including E-cigarettes International Journal of Environmental Research and Public Health, 15 (2) (2018),

p. 313, 10.3390/ijerph150203131. McNeill A, Brose L, Calder R, Bauld L, Robson D. Vaping in England: an evidence update February 2019. London; 2019.
2. N.A. Rigotti, S.E. Moran, H. Wechsler US college students’ exposure to tobacco promotions: Prevalence and association with tobacco use American Journal of Public Health, 95 (1) (2005), pp. 138- 144, 10.2105/AJPH.2003.026054
3. Leah Meza, Artur Galimov, Jimi Huh, Lourdes Baezconde-Garbanati, Steve Sussman, Compliance to

FDA’s elimination of free tobacco product sampling at vape shops, Addictive Behaviors, Volume 125, 2022, 107148, ISSN 0306-4603, https://doi.org/10.1016/j.addbeh.2021.107148. |

|  |
| --- |
| **Q5b.Do you support the proposal that nominal pricing of vaping products should be an offence?**Yes / No / Don’t KnowIn tobacco, there is evidence of high prices being the only tobacco control measure that was both effective in reducing tobacco consumption/increasing quits and positively impacted inequalities [1]. Nominal pricing is especially problematic for an addictive product, such as e- cigarettes. As lowered price, increases the risk of youth use, nominal pricing presents a risk for young people to try and use e-cigarettes more often increasing the risk of product addiction and associated health harm. Furthermore, alcohol research [2] suggests that it is not just that nominal pricing may influence trying/experimentation but may also affect the frequency of use, the intensity of use and continued use, all influencing the transition from youth experimentation to addiction.Recent information on disposable vapes, which seem to be being used by youth, a finding that is also highlighted from early insights from our CRUK project, and are low price (e.g., Elf Bar 600 Puff: £3.99, Jolly Ranger Glow & Vape: £5.99 and Calypso: £4.99). These products are also being bought wholesale by convenience stores and sold at markup widely.It could be argued that by setting vaping products at an affordable price, would help adult smokers quit, especially disadvantaged smokers. Where the price of vaping products of vaping products is lower than that of cigarettes could help adult smokers switch to e-cigarettes. This should be balanced with the youth access to vaping products, as mentioned above. Therefore, we recommended a balanced approach.1. Gilmore, A.B., Tavakoly, B., Taylor, G. and Reed, H. (2013), Understanding tobacco industry pricing strategy. Addiction, 108: 1317-1326. <https://doi.org/10.1111/add.12159>
2. Scott S, Muirhead C, Shucksmith J, Tyrrell R, Kaner E. Does Industry-Driven Alcohol Marketing Influence Adolescent Drinking Behaviour? A Systematic Review. Alcohol Alcohol. 2017 Jan;52(1):84-94. doi: 10.1093/alcalc/agw085. Epub 2016 Nov 17. PMID: 27864186; PMCID: PMC5169036.

**Q6. Do you support the proposal to make sponsorship agreements in respect of vaping products an offence?** |

|  |
| --- |
| Yes / No / Don’t KnowIn 2008, the World Health Organisations (WHO) developed the MPOWER agreement, (**M**onitoring tobacco use and prevention policies, **P**rotect people from tobacco smoke, **O**ffer help to quit tobacco use, **W**arn about the dangers of tobacco, **E**nforce bans on tobacco advertising, promotion and sponsorship and **R**aise taxes on tobacco) [1,2]. Evidence suggests that the strong implementation of MPOWER can lead to significant reductions in tobacco use [3,4]. Given that the same promotional elements that make vaping products attractive to adult smokers could make them attractive to children and non-smokers, therefore effective banning of advertising, promotion and sponsorship of vaping products should be enforced [5].In the UK, the Tobacco Advertising and Promotion Act 2002 prohibited most advertising on billboards and in printed publications. In July 2005, tobacco sponsorship of all international sports events was banned. As a result, many football teams turned to alternative sponsorship deals to secure investment, such as alcohol brands and gambling sites. Alcohol and gambling brands were happy to invest large amounts of funding for the exposure that sponsoring high- profile sporting events offered them. For many clubs, they represented a reliable and well- needed revenue stream. Research has highlighted a pronounced increase in the presence of shirt sponsorship by gambling brands in the English Premier League and a modest increase in the Scottish Premier League [6]. The close relationship between gambling companies and football in the UK, whether through shirt sponsorship or other media, arguably supports the normalisation of gambling. While individual responsibility and control matter, the settings of the English Premier League and Scottish Premier League are increasingly offering inducements to gamble [6].In 2019, the tobacco company British American Tobacco returned to Formula One for the first time in 13 years after securing a global sponsorship with McLaren. Embellishing the cars with their vaping brands, they were accused by many of exploiting a loophole in advertising regulations to allow them to return to motorsport advertising. The vaping brand Totally Wicked are sponsors of St Helens R.F.C and Blackburn Rovers F.C.Sporting events are one example of where industry has been found to sponsor events and teams, therefore non-smokers and vulnerable populations who view the event and/or support the team are exposed to the advertising of various products and brands (including vaping, gambling and alcohol). |

|  |
| --- |
| 1. World Health Organisation 2003. WHO Framework Convention on Tobacco Control. World Health Organisation.
2. World Health Organisation 2013. MPOWER in action. Defeating the global tobacco epidemic.
3. NGO, A., CHENG, K.-W., CHALOUPKA, F. J. & SHANG, C. 2017. The effect of MPOWER scores on

cigarette smoking prevalence and consumption. Preventive Medicine, 105, S10-S14.1. GRAVELY, S., GIOVINO, G. A., CRAIG, L., COMMAR, A., D'ESPAIGNET, E. T., SCHOTTE, K. &

FONG, G. T. 2017. Implementation of key demand-reduction measures of the WHO Framework Convention on Tobacco Control and change in smoking prevalence in 126 countries: an association study. The Lancet Public Health, 2, e166-e174.1. World Health Organisation 2021. WHO report on the global tobacco epidemic 2021: addressing new and emerging products <https://apps.who.int/iris/bitstream/handle/10665/343287/9789240032095-eng.pdf>
2. Christopher Bunn, Robin Ireland, Jonathan Minton, Daniel Holman, Matthew Philpott & Stephanie Chambers (2019) Shirt sponsorship by gambling companies in the English and Scottish Premier Leagues: global reach and public health concerns, Soccer & Society, 20:6, 824-835, DOI: 10.1080/14660970.2018.1425682

**Q7. Do you support the proposal to introduce exemptions to allow advertising at trade- only events?**Yes / No / Don’t KnowWe suggest that trade-only events are not open to the public and attended by over 18s.**Q8a. Do you support the proposal that fines and penalties should mirror those already in place for tobacco products?**Yes / No / Don’t KnowThe Society of Chief Officers Trading Standards Scotland supports mirroring the penalties for tobacco and believes it makes enforcement easier to explain and maintain.**Q8b. Do you support the proposal that defences should be as laid out as above?**Yes / No / Don’t KnowWe suggest that defence to the offences should be the same as tobacco and would mirror those laid down in the 2002 Act for tobacco advertising and promotion.**Q8c. Do you support the proposal that officers of local authorities should be responsible for enforcement?**Yes / No / Don’t Know |

|  |
| --- |
| Yes – Trading Standards as per tobacco and e-cigarettes regulations enforcement.**Q9a. Please indicate the impact the proposed policy would have on individuals.**No impacts / Positive impact / Negative impact / Don’t knowWe believe the proposed policy would have a positive impact on individuals (including non- smokers, youths and those living with socio-economic disadvantage). As discussed previously, early insights from our CRUK project show that youths are susceptible to advertising of vaping products, especially on social media. Introducing the proposal would prevent such individuals from being exposed to the advertising, promotion and sponsorship of vaping products, while still allowing smokers who wish to use e-cigarettes as a smoking cessation tools access to such products. Also, research by Haw et al. [1] was conducted to capture the impact of the point-of- sale tobacco display ban on young people’s exposure to tobacco advertising. The study [1] highlighted a high awareness of e-cigarette promotions in shops and data analysis showed among young never-smokers, using e-cigarettes is positively associated with subsequently trying combustible cigarettes. Without knowing the impact of the advertising on helping adult smokers quit it is hard to judge whether the overall effect would be positive or negative.[1] Haw S, Currie D, Eadie D, Pearce J, MacGregor A, Stead M, et al. The impact of the point-of-sale tobacco display ban on young people in Scotland: a before-and-after study. Public Health Res 2020;8(1).**Q9b. Please indicate your view on the impact of the proposed policy on people living with socio-economic disadvantage?**No impacts / Positive impact / Negative impact / Don’t knowLearning from lessons in other areas of public health [1,2] and based on our response to Q2 and Q5b we believe a balanced approach should be adopted to ensure that those living with socio-economic disadvantage are given equal opportunities to use e-cigarettes as a smoking cessation aid, while simultaneously protecting them (as discussed in Q2).[1] Jonathan R. Olsen, Chris Patterson, Fiona M. Caryl, Tony Robertson, Stephen J. Mooney, Andrew G. Rundle, Richard Mitchell, Shona Hilton, Exposure to unhealthy product advertising: Spatial proximity analysis to schools and socio-economic inequalities in daily exposure measured using Scottish |

|  |
| --- |
| Children's individual-level GPS data, Health & Place, Volume 68, 2021, 102535, ISSN 1353-8292, [https://doi.org/10.1016/j.healthplace.2021.102535.](https://doi.org/10.1016/j.healthplace.2021.102535)[2] Settle, P, Cameron, A & Thornton, L (2014) Socioeconomic differences in outdoor food advertising at public transit stops across Melbourne suburbs. Austr N Z J Public Health 38, 414–418**Question 9c. Please identify communities or groups who may be impacted by these proposals**No impacts / Positive impact / Negative impact / Don’t knowWe believe that a balanced approach should be adopted to ensure that certain populations groups are not disadvantaged by the proposed restrictions (see Q9b). Marketing e-cigarettes pose the risk of keeping disadvantaged communities trapped in addiction and dual-use, ongoing purchase (unlike NRT, etc. as e-cigarettes are not available on free prescription nor likely to be in the foreseeable future) and bringing the next generation into tobacco and nicotine addiction. We believe more research is needed, particularly in relation to point of sale vaping displays helping those living with socio-economic disadvantage quit smoking. |
| **When was the response submitted?** |
| 29th April 2022 |
| **Find out more about our research in this area** |
| [www.gla.ac.uk/sphsu](http://www.gla.ac.uk/sphsu) |
| **Who to contact about this response** |
| Marissa Smith, Research Assistant, MRC/CSO Social and Public Health Sciences Unit Email: Marissa.Smith@glasgow.ac.uk |