



POSSIBLE POINTS TO INCLUDE

Banning flavours would effectively prohibit all or most of the products, leaving only the tasteless base or tobacco and menthol flavoured liquids. This would make e-cigarettes significantly less effective as alternatives to smoking for adults, promote a black market and may even increase risks to young people if it encourages them to smoke instead or to access black markets.

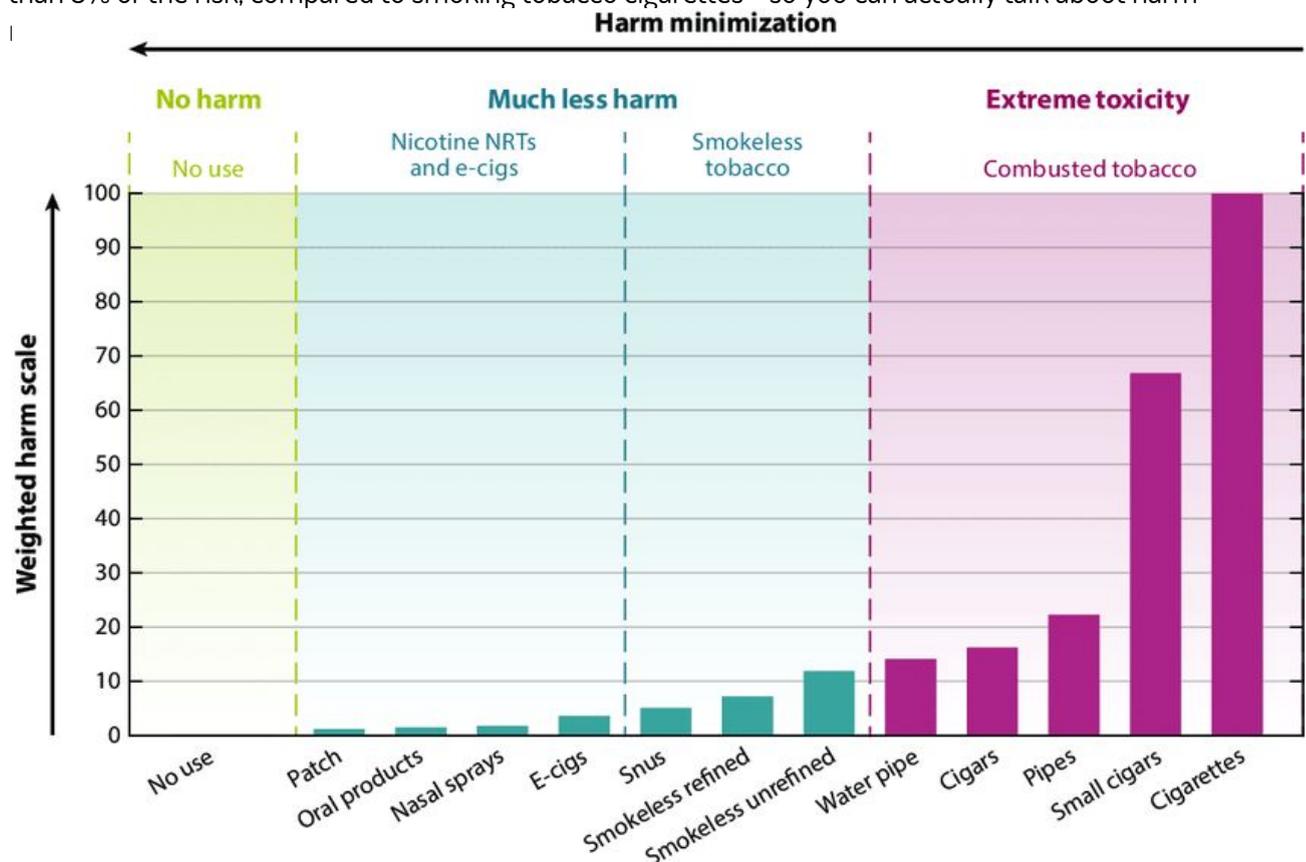
Include your personal experiences - or those of those close to you.

Impact assessment⁴ (NOT a risk assessment)

The impact assessment focuses exclusively on preventing youth access to products and completely ignores the benefits for adult smokers. It is not solely the government's or the EU's job, to prevent children from doing things they are not supposed to do - that's also their parents job! And decreasing the variety of products available on the market for adult consumers, will only create more smokers, less people switching to low risk alternatives, and we could very likely see the majority of vape shops close in Denmark.

All tobacco and vaping products are viewed as being as harmful as combustible tobacco.

The danish authorities have not yet conducted any risk assessment or analysis, comparing the levels of danger, between the different kinds of nicotine containing products. **DADAFO** has looked at the different risk profiles calculated in USA, UK and various other countries, and it seems that e-cigarettes carry less than 5% of the risk, compared to smoking tobacco cigarettes - so you can actually talk about harm



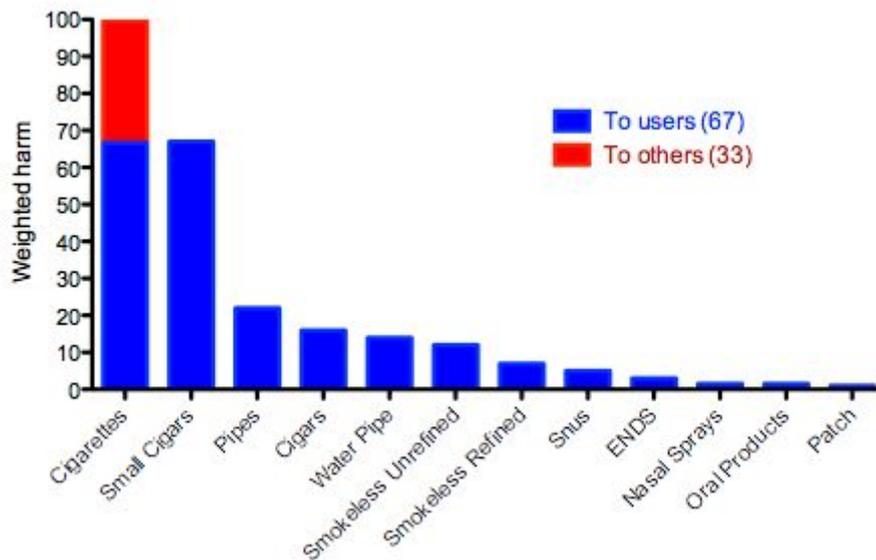
⁴ https://dadafo.dk/wp-content/uploads/2020/04/DK-Impact-asseessment-Eng_TRANSLATED_20200424.pdf



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https://www.researchgate.net/publication/322407636_Harm_Minimization_and_Tobacco_Control_Refraiming_Societal_Views_of_Nicotine_Use_to_Rapidly_Save_Lives



<https://commons.wikimedia.org/wiki/File:Nicotineharm.png>

Importance of flavours to adults

The availability of different flavours is the most attractive characteristic of e-cigarettes, according to a 2019 paper published in Environmental Health .

E-Liquid Flavor Preferences and Individual Factors Related to Vaping: A Survey among Dutch Never-Users, Smokers, Dual Users, and Exclusive Vapers

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6926905/>

Changing patterns of first e-cigarette flavor used and current flavors used by 20,836 adult frequent e-cigarette users in the USA

Adult frequent e-cigarette users in the USA who have completely switched from smoking cigarettes to using e-cigarettes are increasingly likely to have initiated e-cigarette use with non-tobacco flavors and to have transitioned from tobacco to non-tobacco flavors over time. Restricting access to non-tobacco e-cigarette flavors may discourage smokers from attempting to switch to e-cigarettes.

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6022703/>

National Academies of Science, Engineering and Medicine (NASEM) - "Public Health Consequences of e-cigarettes, January 2018"

<https://www.nap.edu/read/24952/chapter/1>

Public Health England (PHE) - "Evidence review of e-cigarettes and heated tobacco products 2018: executive summary, March 2nd 2018"

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/684963/Evidence_review_of_e-cigarettes_and_heated_tobacco_products_2018.pdf



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Public Health England's 2020 Evidence Update found that fruit flavours are the most popular flavours for adult vapers, that banning flavoured e liquids would deter adults from vaping and might push them towards unregulated and illicit products.

Vaping in England: evidence update March 2020, Public Health England

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/869401/Vaping_in_England_evidence_update_March_2020.pdf

Clinical evidence from the England National Centre for Smoking Cessation and Training (NCSCT, 2016) demonstrates that fruit flavours are popular with those ex-smokers who want to avoid the taste of tobacco.

Electronic cigarettes: A briefing for stop smoking services, National Centre for Smoking Cessation and Training (NCSCT)

https://www.ncsct.co.uk/publication_electronic_cigarette_briefing.php

Once Again: Flavours Are Preferred by Adults, Not Just Teens

“Our data show that flavors aren’t just popular with the youth, but [with adults as well](#),” said lead author and associate professor of medicine and public health sciences, Dr. Ping Du. “Many of the participants in our study indicated that they used e-cigarettes as a means to quit smoking or avoid relapse, and these flavors may be part of the reason why they end up using e-cigarettes in the long term,” she said.

<https://www.vapingpost.com/2020/04/20/once-again-flavours-are-preferred-by-adults-not-just-teens/>

Flavours - why do vapers like them?

What would be your answer to the proposition “*A specific reason I use flavored e-liquid in my electronic cigarette product is...*”? – This is the topic that Dr Eric Soule, a researcher from the Center for the Study of Tobacco Products of the Department of Psychology of Virginia Commonwealth University addresses in his last with a financial support of the National Institute on Drug Abuse of the National Institutes of Health.

Soule EK., Lopez AA., Guy MC., Cobb CO., 2016. Reasons for Using Flavored Liquids among Electronic Cigarette Users: a Concept Mapping Study. Drug and Alcohol Dependence

<http://dx.doi.org/10.1016/j.drugalcdep.2016.07.007>

Black market

If people cannot buy regulated products they will turn to the black market. Unregulated products may include harmful ingredients and could be dangerous to the user, creating a net harm increase to the general public health.

Removing flavours will result in independent vape shop closures, which will favour the tobacco industry.



Youth vaping in Denmark, and in general

The reason given for the notification are concerns about youth vaping. However, countries which collect data have not seen significant increases in vaping amongst teens who do not already smoke. This is the case in many of the European countries, where the TPD has been introduced. In Denmark, smoking and vaping is prohibited for youth under the age of 18 - and in many schools, it is frowned upon. The school masters/mistresses take direct action, if they find out that any pupils are smoking or vaping, and report it to their parents. The result of these actions is, that many youths instead switch to snus!

| Survey of schoolchildren | | | | | | |
|--------------------------|------------|------|-----------------|--------------------------------|------|-----------------|
| | Ever tried | | Difference in % | Used within the previous month | | Difference in % |
| | 2014 | 2018 | | 2014 | 2018 | |
| Boys (age) | | | | | | |
| 11 | 3 | 2 | -33% | 2 | <1> | -100% |
| 13 | 11 | 11 | - | 11-7 | 5 | -28.5% |
| 15 | 33 | 30 | -1.1 | 17 | 13 | -23.5 % |
| Girls (age) | | | | | | |
| 11 | 1 | 1 | - | 1 | <1 | ? |
| 13 | 7 | 5 | -28% | 4 | 2 | -50% |
| 15 | 24 | 17 | -29% | 13 | 7 | -46% |

The "Survey of School children", conducted in 2014 and 2018, show a major decline in youth that vape, and if the Danish Health Authority (Sundhedsstyrelsen) would publish their long awaited and long overdue report for 2019, the decline would probably be even more drastic.

People, and youth, do not start vaping because of the flavours - they start either because they need a low risk alternative to smoking - or out of curiosity.

Link to show key risk factor for youth smoking is having parents who smoke:

<https://www.sciencedirect.com/science/article/pii/S0306460318306233>

NYTS 2019 data - curiosity was the number one reason for teen vaping (flavours 3rd)

https://www.cdc.gov/mmwr/volumes/68/ss/ss6812a1.htm#T5_down



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On behalf of the association's members, the board of DADAFO and the Danish vapers...

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Disclaimer - Who is DADAFO

DADAFO - Danish Vapers Association, is an independent, non-profit consumer organization run by members/consumers. The board is elected by the members and the association is run for the membership fees and the consumers voluntary donations. There are no financial connections to either the tobacco, pharmaceutical or e-cigarette/e-vapor industries. All work in the association is done voluntarily on a pro bono basis.

DADAFO speaks on behalf of the Danish vapers, as well as the smokers who in the future are expected to want to use an e-product as an alternative to smoking tobacco - or as part of a smoking cessation.

DADAFO currently has over 3.100 registered and dedicated members, all of whom are over 18 - which is a requirement for membership of the association. The median age of the association members is approx. 40-42 years. The members of DADAFO come from all parts of the country, and the state community.

DADAFO is part of a larger international consumer community; [INNCO. The International Network of Nicotine Consumer Organizations](#) - which, through information and knowledge sharing, tries to put tobacco harm reduction, THR, on the global political agenda.

DADAFO is part of a larger European consumer community, [ETHRA - European Tobacco Harm Reduction Advocates](#), which, through information and knowledge sharing, tries to put tobacco harm reduction, THR, on the European political agenda.

DADAFO is part of a larger Nordic consumer community, [NNTHR - Nordic Network on Tobacco Harm Reduction - CSO-NGO](#), which through information and knowledge sharing, tries to put tobacco harm reduction, THR, on the Nordic political agenda.

DADAFO conducts nonprofit lobbying and information work, and actively participates in information work, standardization work through Danish Standard, CEN and ISO.

DADAFO participates in international conferences on health promotion, tobacco harm reduction and the use of alternative nicotine products as a substitute for the tobacco products.

DADAFO is always available for a developing and mutually informative dialogue - and you can always contact us with any questions - by visiting our website.

DADAFO as a consumer organization, advocates that the market for e-cigarettes and e-vapor products must of course be regulated - so that we as consumers can be sure that the equipment we buy is as safe as possible and that the liquids we buy are as good, clean and of the highest quality possible. But regulation/legislation must also be proportionate, to ensure that it is not easier or cheaper to choose tobacco cigarettes rather than e-cigarettes.

DADAFO as a consumer organization, is in favor of setting an age limit of 18 years, as adopted by law. We are well aware that there are already vapers under the age of 18, and setting an age limit makes it easier for politicians to argue that e-vapor products are primarily for use by adults trying to make something good for their health, by replacing the tobacco with a far less harmful alternative.



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DADAFO as a consumer organization, does **NOT** advocate that e-cigarettes/e-vapor products should be equated/conflated with smoking - and thus covered by the "Smoke-free Environment Act". To date, there is **NO** scientific basis for equating vapor and smoke, as all studies and tests conducted by the chemical composition of the vapor shows, that there are no hazardous substances in the vapor that is exhaled in sufficient quantities to create any health damage if staying with or standing right next to someone vaping. The smell/scent of the vapor can of course be a nuisance to someone - just like poor body hygiene, excessive use of perfume etc. can be a nuisance to someone - not saying that just because something can irritate you, it is automatically a health risk.

DADAFO as a consumer organization, does **NOT** endorse the adoption of a total advertising ban on e-cigarette related products. From a health perspective, all consumers of tobacco products should be made aware that today there is a far less harmful alternative - by which many can completely replace tobacco smoking by switching completely to vaping.

DADAFO as a consumer organization, does **NOT** advocate a total export and import ban on goods from the other EU Member States. The "e-cigarette law" does not prohibit direct export and import, but makes the opportunity extremely expensive for manufacturers outside Denmark. If a manufacturer wants to sell its products (possibly via webshops located in other EU countries) - then the vendor/manufacturer must apply/notify his products to the Danish Safety Technology Authority, after paying some very high notification fees that do not meet the requirement via the EU on the free accessibility of goods across EU borders. If a Danish company wants to market/sell its products in another EU country, the products may have to also be notified to the country's local authority before a sale/export can be carried out legally.

Unfortunately, DADAFO sees a possibility that the only products that can be legalized through the bill will be products that must meet such high requirements for leaking safety and a filling mechanism that also ensures against contact with the nicotine-containing liquid - that the only products that will be allowed will become the so-called cig-a-likes: E-cigarettes that look like traditional cigarettes, and as most experienced vapers have only used for a very short period, as the products are too inefficient and too poor in practical use.

DADAFO is an association for all e-cigarette consumers - and you can join the association by registering on our website: www.dadafo.dk/medlemskab

A basic membership is free - and you can become a full member for only DKK 120 per year. As a vendor or employee in a vape store, you can sign up for a support membership, also for DKK 120 per. year. As a support member, however, you have no right to vote or representation on the association's board or committees.