



Dr. Francisco Duque III
Secretary
Department of Health
Philippines
ftduque@doh.gov.ph

9 December 2020

Dear Secretary Duque,

We understand that the Department of Health is planning to issue health warnings for e-cigarettes and heated tobacco products, and we are writing today to urge you to adopt warnings which will encourage smokers to use safer nicotine products to quit smoking. We are a consortium of consumer groups in Europeⁱ and most of us are ex-smokers who used safer nicotine products to quit smoking, often when other methods and products had failed. These products have benefited our lives hugely and we fervently hope that smokers in the Philippines can benefit from safer nicotine products too.

Safer nicotine products, such as e-cigarettes and heated tobacco products, are far less harmful to the user than smoking because there is no combustion involved. The UK's Royal College of Physicians foundⁱⁱ that vaping is at least twenty times less harmful to health than smoking:

“the available data suggest that they are unlikely to exceed 5% of those associated with smoked tobacco products, and may well be substantially lower than this figure”.
(Section 5.5 page 87)

Many reputable institutions worldwideⁱⁱⁱ have also stated that vaping is far less harmful than smoking. However, this matters little if smokers themselves are not made aware of the differences in risk.

Here in Europe vaping products are regulated under the Tobacco Products Directive (TPD). The TPD requires health warnings for vaping products but the warnings are excessive in relation to the health risks and there is evidence that the TPD warnings deter smokers from switching^{iv}. A key incentive for smokers to quit is to improve their health – why would smokers switch to using a product which is less harmful, if unaware that it is less harmful?

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Canada has pioneered an approach using this list of approved relative risk statements about vaping products, which we hope will pass into law there soon:

List of Statements for Use in the Promotion of Vaping Products^v

1. If you are a smoker, switching completely to vaping is a much less harmful option.
2. While vaping products emit toxic substances, the amount is significantly lower than in tobacco smoke.
3. By switching completely to vaping products, smokers are exposed to a small fraction of the 7,000 chemicals found in tobacco smoke.
4. Switching completely from combustible tobacco cigarettes to e-cigarettes significantly reduces users' exposure to numerous toxic and cancer-causing substances.
5. Completely replacing your cigarette with a vaping product will significantly reduce your exposure to numerous toxic and cancer-causing substances.
6. Switching completely from smoking to e-cigarettes will reduce harms to your health.
7. Completely replacing your cigarette with an e-cigarette will reduce harms to your health.

As you can see, the statements are designed to appeal to smokers and to give accurate information about the relative harms of smoking and of vaping. We hope that the Philippines can consider adopting warnings similar to these, to give smokers the accurate information which they are entitled to and to maximise the public health gains offered by these vastly safer products.

Yours sincerely,

Damian Sweeney
on behalf of ETHRA

ⁱ European Tobacco Harm Reduction Advocates (ETHRA) is a group of 21 consumer associations in 16 European countries, representing approximately 27 million consumers across Europe and supported by scientific experts in the field of tobacco control or nicotine research. We are mostly ex-smokers who have used safer nicotine products, such as vapes and snus, to quit smoking and to remain smoke free. ETHRA is not funded by the tobacco or vaping industry, in fact we are not funded at all as our grouping is a voice for our partners who arrange their own revenue and who give their time to ETHRA for free. Our mission is to give consumers of safer nicotine products a voice and to ensure that the full harm reduction potential of safer nicotine products is not hindered by inappropriate regulation [[website](#)]

ⁱⁱ Royal College of Physicians (London), Nicotine without smoke: tobacco harm reduction, April 2016 [[access](#)]

ⁱⁱⁱ Vapear es menos nocivo que fumar y ayuda a dejar el tabaco : estas 24 instituciones lo respaldan [[access](#)]

^{iv} Communicating the relative health risks of E-cigarettes: An online experimental study exploring the effects of a comparative health message versus the EU nicotine addiction warnings on smokers' and non-smokers' risk perceptions and behavioural intentions, Catherine Kimber, Daniel Frings, Sharon Cox, Ian P Albery, Lynne Dawkins [[access](#)]

^v World Trade Organization, Bill S-5, An Act to amend the Tobacco Act and the Non-Smokers' Health Act and to make consequential amendments to other Acts [[access](#)]