

Submission on the Vaporised Nicotine Products Bill 2017

About Me

I was a smoker for 29 years before I upgraded 3 years ago from the smoke of cigarettes to a nicotine containing aerosol (commonly referred to as 'vapour') produced by an e-cigarette. As I looked more into field of nicotine based 'vaping', I was inspired to become an advocate for these devices. There is great potential to lure smokers away from the combustible cigarettes that we are told kill 2 out of 3 of their users, to vaping devices that the Royal College of Physicians describes as unlikely to be more than 5% as harmful as combustible cigarettes, and potentially much less.

Preamble

While vape devices have no long term studies to support that they are 'safe' it's a no-brainer that these devices are much healthier than cigarettes, if only based on the toxicity of the vapour in comparison to the chemical components of cigarette smoke.

I wish to comment on the legislative changes as proposed in this bill. While agreeing with them in principle, I disagree with the 20 mg/mL limit placed on nicotine strength.

Comments on Legislation

In brief, I propose **higher limits** of:

- 30 mg/mL for bottled, 'ready to vape' e-liquid (as per Schedule 6 listing).
- 60 mg/mL for e-liquid in sealed units like pod systems & cigalikes.
- 100 mg/mL for entities supplying e-liquid.

Discussion of Proposed Limits

3% (30 mg/mL) is already legal under Schedule 6 of the SUSMP (for animal use). Significantly, it is available without a veterinarian's prescription or advice (that is covered under Schedule 4), indicating that the people that administer the SUSMP feel it is safe enough to allow for sale to Australian consumers & be stored in domestic residences, with appropriate warnings.

That is allowing 3% nicotine to be sold in a form which might cause accidental ingestion by drinking the liquid.

Sealed units such as found in pods & non-refillable cigalikes are another matter - the only potential for poisoning is via inhalation. As discussed above, self-titration makes the chances of that negligible.

Anecdotally I heard of a vaper whose friend had given him liquid but had not explained that it was 100 mg/mL concentrate intended to be diluted.

He vaped that liquid for a couple of days before reporting to a vaping forum that it gave him head aches and tasted 'harsh' - so he could not use much of it. The significant 'takeaways' from this story are that:

- A. He survived to tell the story & ask advice.
- B. That self-titration was the key to preventing harm.

For this reason I feel that at least 60 mg/mL should be considered safe enough for sealed units.

The 100 mg/mL level for suppliers of e-liquid is necessary to allow those mixing e-liquid to combine flavours and adjust the excipient levels of the final liquid between propylene glycol (which is a superb flavour solvent/carrier & provides an effect on the throat feels similar to inhaled cigarette smoke – but without the harm) and vegetable glycerine (a smoother tasting, thicker liquid that provides a more visible cloud).

Will these limits work for 100% of smokers that want to quit using vapour devices? No. But then, I don't think that vapour devices with any level of nicotine will work for *all* smokers wanting to quit. But we should not let the perfect be the enemy of the good. Perhaps if the smoker cannot get enough satisfaction from the highest allowable limits, they might supplement their nicotine intake with use of Swedish style Snus, snuff or Heat-Not-Burn products. Getting those legalised for consumer use in Australia is an important, but separate, matter.