

## QoN 014-06

Your submission indicates that it's misleading to attribute falls in smoking prevalence to increases in vaping use, and that it's misleading to directly compare smoking rates between countries as counting methods differ.

Do you consider that international examples of success in lowering smoking rates are deliberately distorted in order to make a case for Australia to loosen its regulatory approach?

Response: One of us (SC) has been pointing out since at least 20 Dec 2018 (see here <https://simonchapman6.com/2018/12/20/man-the-lifeboats-australian-smoking-has-stopped-falling-or-has-it/> and here <https://simonchapman6.com/2019/09/26/the-dirty-dozen-twelve-myths-about-e-cigarettes/>) that ATHRA and some others have persistently not drawn any attention to the different ways in which "smoking" is measured by official national surveys in comparable nations.

Their failure to take note of these differences in their pronouncements that Australia is falling behind these other nations is consistent with a view that ATHRA does not wish to acknowledge that such differences in measuring smoking are important and that they are inconvenient to its public position that Australia needs vaping to keep up with other nations.