

Response ID ANON-GC1H-5S3T-J

Submitted to Proposal to clarify how nicotine levels for vaping products are expressed in the Smokefree Environments and Regulated Products Regulations 2021

Submitted on 2023-06-26 16:25:37

Your details

1 What is your name?

Name:

Emma Shields

2 What is your email address?

Email:

emma@cancer.org.nz

3 Are you submitting on behalf of an organisation?

Yes

If so, what is your organisation?:

Cancer Society of New Zealand

4 What ethnicity/ethnicities do you identify with?

Not applicable (eg, I'm submitting of behalf of an organisation or group)

5 What Iwi do you affiliate to?

What Iwi do you affiliate to?:

6 I am, or I represent, the following category or categories (select all that apply)

Community or advocacy organisation

Other:

Proposal questions

7 Do you agree with our proposal to set the maximum allowable nicotine concentration at 28.5mg/mL for reusable vaping products that contain nicotine salts?

Yes

8 Please explain your reasoning.

If No, please explain.:

We agree with the need to clarify the interpretation of the regulations. We are concerned that there has been a confusion with the interpretation of the legislation which could result in vaping products with very high nicotine levels on the market. We understand that this was never the intent of the legislation, and the Ministry always intended the 50mg/mL to apply to the nicotine salt concentration, and not the total level of nicotine in the product. We agree that it is important that these regulations are accessible and easily understood by everyone. It is important that the level stated on packaging is accurate. Referring to the maximum nicotine concentration of a vaping product, rather than the maximum permitted nicotine salt concentration, will help with this.

We also agree with the proposed level of 28.5mg/mL to balance the level of nicotine for people who use vapes to stop smoking with protecting young people from nicotine addiction. We are not aware of strong evidence to show that products with very high nicotine levels are needed for people who smoke who want to switch to less harmful products.

9 Is there anything else you would like to tell us at this time?

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Declarations and privacy

10 Publishing submissions

You may publish this submission

11 Do you have commercial interests?

I do not have any commercial interests in smoked tobacco or other regulated products (vaping products, other notifiable products)

12 Commercially sensitive information

This submission does not contain commercially sensitive information

13 Protection from commercial and other vested interests of the tobacco industry

Please provide details of any tobacco company links or vested interests below.:

None.