



Public Health Association
AUSTRALIA

**Public Health Association of Australia
Submission:
Vaping and Tobacco Controls in Victoria**

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The **Public Health Association of Australia** (PHAA) is Australia's peak body on public health. We advocate for the health and well-being of all individuals in Australia.

We believe that health is a human right, a vital resource for everyday life, and a key factor in sustainability. The health status of all people is impacted by the social, commercial, cultural, political, environmental and economic determinants of health. Specific focus on these determinants is necessary to reduce the root causes of poor health and disease. These determinants underpin the strategic direction of PHAA. Our focus is not just on Australian residents and citizens, but extends to our regional neighbours. We see our well-being as connected to the global community, including those people fleeing violence and poverty, and seeking refuge and asylum in Australia.

Our mission is to promote better health outcomes through increased knowledge, better access and equity, evidence informed policy and effective population-based practice in public health.

Our vision is for a healthy population, a healthy nation and a healthy world, with all people living in an equitable society, underpinned by a well-functioning ecosystem and a healthy environment.

Traditional custodians - we acknowledge the traditional custodians of the lands on which we live and work. We pay respect to Aboriginal and Torres Strait Islander elders past, present and emerging and extend that respect to all other Aboriginal and Torres Strait Islander people.

Introduction

PHAA welcomes the opportunity to provide input to the Committee's inquiry into Vaping and Tobacco Controls in Victoria.

Tobacco smoking is the leading preventable cause of death and disease both in Victoria and across Australia. Every year in Victoria, tobacco costs 4,000 lives and \$5 billion dollars (AUD). There are at least 7,000 chemicals in tobacco smoke, of which over 70 cause cancer.

Young people who vape are three times more likely to start smoking tobacco and become regular smokers. Under-18 years olds report easily accessing vapes through friends or "dealers" at school or outside school, and report ready access to e-cigarettes online and in stores.

Harms to Victorians:

Nicotine e-cigarette use in non-smokers leads to dependence, and causal links have been demonstrated in the development of e-cigarette or vaping product use-associated lung injury (EVALI). Evidence of accidental poisonings in children under six years of age, and severe poisonings or death in other users from intentional or accidental nicotine e-liquid exposure are discussed further in this submission, with evidence of seizures from using nicotine e-cigarettes, and severe or potentially fatal burns or injuries.

Vaping products also cause fires and environmental waste from the lithium batteries used to power the devices, and contamination from microplastics, chemicals and metals that leach from the products into our environment including soils and waterways.

The recent National Drug Strategy Household Survey 2022-2023 shows use of e-cigarettes and vapes almost tripled between 2019 and 2023. The number of current e-cigarette users in Victoria is now over seven times higher than in 2016. **Victoria is playing catch-up and needs to act now.**

Summary of Recommendations:

- Support proposed Commonwealth vaping legislation introduced into Parliament in March 2024 which aims to address the widespread illegal sale of vaping products by restricting supply of vaping products (regardless of nicotine content) to therapeutic access from pharmacies via clinician prescription through the effectively regulated pharmaceutical supply chain.
- Support enhanced monitoring and enforcement to tackle the illegal sale of e-cigarettes and other illegal nicotine products (e.g., nicotine pouches).
- Create a Victorian licensing system for the sale of tobacco that includes probity checks for licence holders and licence fees to cover costs of monitoring and ensuring compliance with all licensing conditions.
- VicPol to continue to work in conjunction with national tax and crime authorities towards ending supply of illicit tobacco in Victoria.
- Support a ban on all forms of advertising, promotion, marketing and sponsorship of e-cigarettes and tobacco products.
- Provide ongoing education and support for Victorians wishing to quit smoking and vaping.

PHAA strongly supports the measures outlined in the National Tobacco Strategy 2023-2030. The goals of government policies on tobacco and novel nicotine-based products, including e-cigarettes, should include the prevention of uptake of all forms of nicotine use by all people, and the cessation of use by all current users.

Response to Inquiry Terms of Reference

Trends in vaping and tobacco use and the associated financial, health, social and environmental impacts on the Victorian community

Trends in vaping and tobacco use

Tobacco smoking is the leading preventable cause of death and disease both in Victoria¹ and across Australia.² Every year in Victoria, tobacco costs 4,000 lives and \$5 billion dollars (AUD).¹ There are at least 7,000 chemicals in tobacco smoke, of which over 70 cause cancer.²

Research shows strong evidence between vaping and future smoking behaviours. **Young people who vape are 3 times more likely to start smoking tobacco and become regular smokers.**^{3,4,5} Under-18 years olds report easily accessing vapes through friends or “dealers” at school or outside of school,⁶ and report ready access to e-cigarettes online and in stores.⁷ The Australian Secondary School Students Alcohol & Drug (ASSAD) Survey 2022/2023²⁶ clearly demonstrates the significant increase in uptake of vaping in young people from the age of 12 in Australia (see Figure 1) compared with previous data, reflecting similar patterns understood to be the case for Victoria.

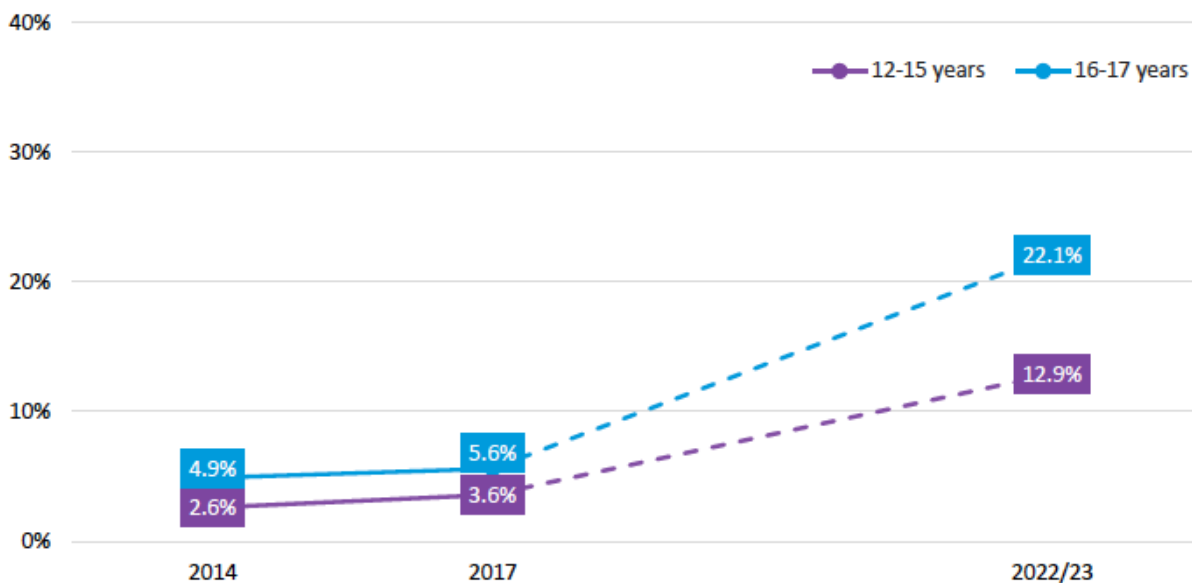


Figure 1: Past month vaping over time among Australian secondary school students by age group, 2014-2022/2023.

Notes: The dotted line between 2017 and 2022/2024 indicates that caution should be exercised when interpreting this trend as linear.

Marked increase in e-cigarette use among younger age groups in Victoria is evident in the results of the most recent National Drug Strategy Household Survey 2022-2023 released on 29th February 2024 – see Figure 2:^{8,9}

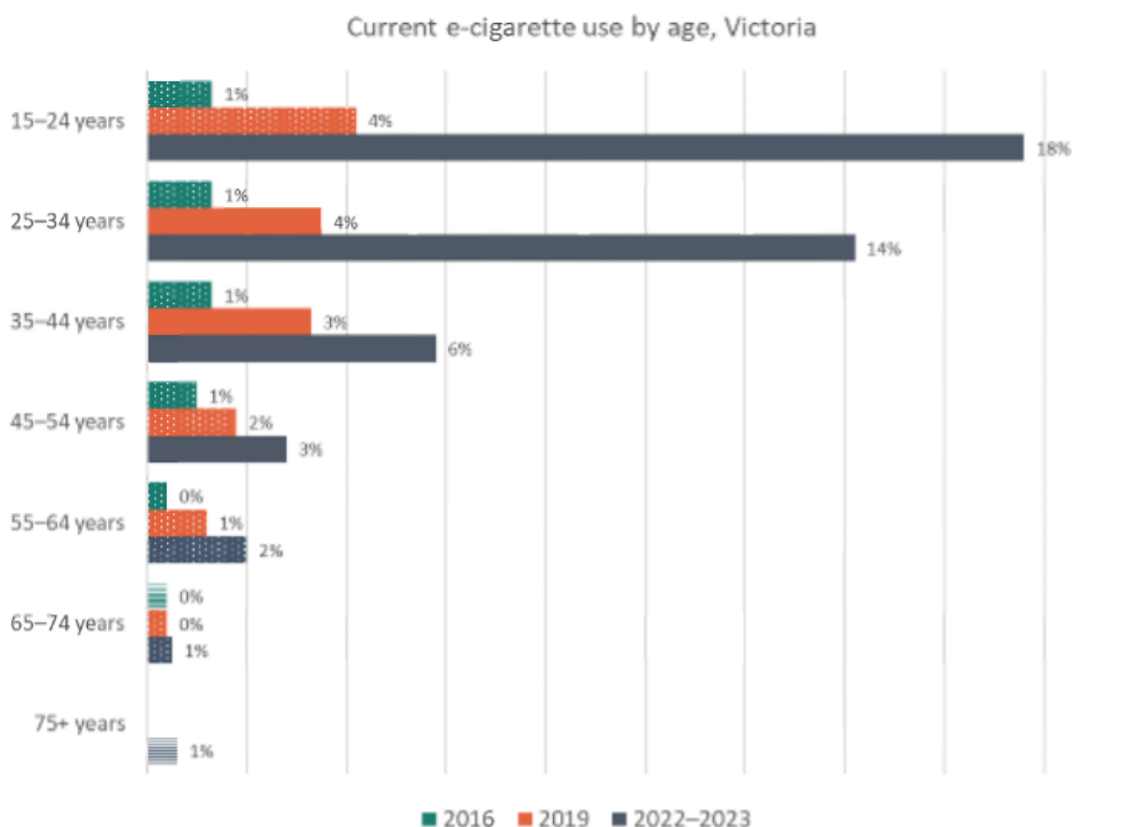


Figure 2. Proportion of Victorians who report current use of e-cigarettes, 2022-23 compared to 2019 and 2016.^{8,9}

Victorian state-specific data from the National Drug Strategy Household Survey 2022-2023 shows:

- The proportion of people who smoked tobacco daily in Victoria dropped from 10.2% to 7.6% between 2019 and 2023, marking the lowest level recorded since 2001 when 19.2% of people smoked daily.⁹
- Around 1 in 5 people (18.9%) in Victoria had used electronic cigarettes and vapes ('e-cigarettes') at least once in their lifetime, an increase from 11.7% in 2019.⁹
- Approximately 400,000 people were using e-cigarettes in 2022–2023, quadruple the number doing so in 2019 (100,000 people).⁹
- People aged 18 to 24 were the most likely to be currently using e-cigarettes, at 19.9%, reflecting the national trend.⁹
- Due to a sizeable decline in smoking among people in their 50s (from 14.4% to 10.0%), people in their 40s are the most likely to smoke daily in 2022–2023 in Victoria at 11.7%.⁹

Recent evidence has shown that for vaping and tobacco use amongst Victorian adults, **over 77,000 people who have never smoked tobacco currently vape**, 54% of current e-cigarette users are aged under 30 years, only 9% of users of nicotine e-cigarettes in the past year had a prescription from their doctor, and 75% of users purchase e-cigarette devices from high street vendors.^{10,11}

Associated impacts

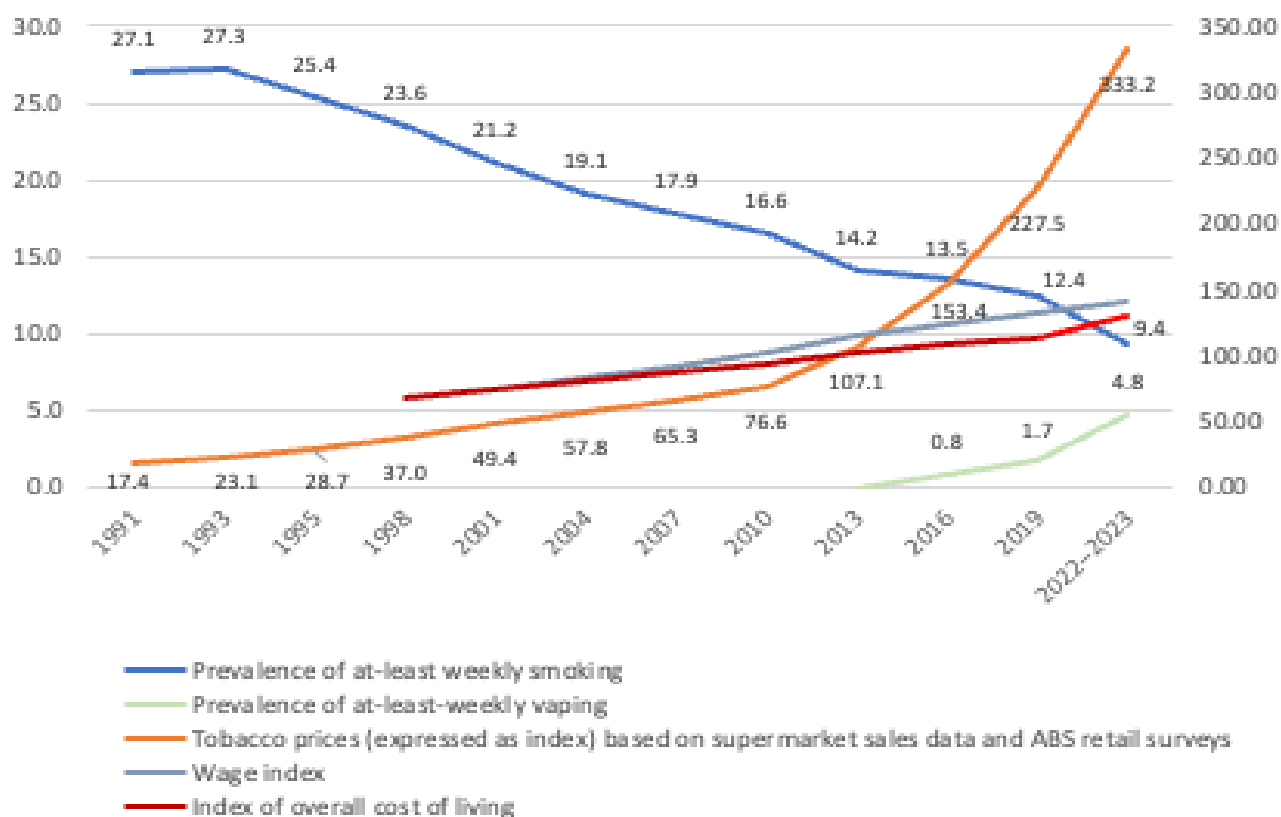
Financial: Smoking and vaping impose a large economic burden on Victorian individuals, families, and society. The direct costs of smoking-related health care, productivity losses, and fire damage are estimated to be \$136.9 billion per year in Australia.¹² The indirect costs of vaping, such as the potential for increased tobacco use among youth and dual users, are not yet fully known.

The price of tobacco products has increased very significantly in Australia over the past ten years, with annual 12.5% increases in excise/customs duty resulting in increases in retail price each year, making

smoking less affordable.¹³ The tobacco and e-cigarette industry promote claims that vaping is responsible for the reduction in smoking prevalence. However, excise/customs duty increases are one of several key factors omitted by the industry in discussing the reduction in smoking prevalence. Actual evidence of the efficacy of freebase nicotine e-cigarettes as a smoking cessation aid is limited.⁴

The decline in tobacco use consistently follows price increases, with a 4% reduction in consumption for every 10% increase in price.¹⁴ The decline in prevalence in Australia since 2019 (see Figure 3) is almost exactly in line with that which would be predicted by validated research on tobacco price and income elasticity.

Figure 3. Prevalence of regular smoking, use of e-cigarettes v. price of tobacco and wages and cost of living.¹⁵



Sources: Australian Institute of Health and Welfare. [National Drug Strategy Household Survey 2022–2023](#). Canberra: AIHW, 2024.
 Australian Bureau of Statistics (Dec-quarter-2023), [Consumer Price Index, Australia](#), ABS Website, accessed 21 March 2024.
 Australian Bureau of Statistics (December 2023), [Wage Price Index, Australia](#), ABS Website, accessed 21 March 2024.
 Centre for Behavioural Research in Cancer checks of tobacco prices on online supermarket websites (Melbourne stores), February 2024.

Health: Smoking and vaping can harm almost every organ and system in the body. Smoking causes or contributes to many chronic diseases, such as lung cancer, chronic obstructive pulmonary disease, heart disease, stroke, and diabetes. Vaping can expose users to toxic chemicals, heavy metals, and nicotine, which can damage the lungs, heart, brain, and blood vessels. Smoking and vaping can also affect the health of non-users, such as pregnant women, children, and people with asthma, through passive exposure. Several complications related to vaping use are emerging, especially with the increased frequency of vaping and dual use with tobacco. Some of these complications are well described in the literature and can be directly linked to vaping, such as e-cigarette or vaping-associated lung injury (EVALI).¹⁶

Conclusive evidence (where there is no doubt) regarding e-cigarette use and health outcomes:⁴

- Causal link for e-cigarette or vaping product use-associated lung injury (EVALI).

- Potentially fatal or severe burns and injuries.
- Intentional or accidental exposure to nicotine e-liquids causing potentially severe poisoning which can be fatal:
 - Considerable number of accidental poisonings in children under six years of age.^{4,17}
 - Potential for nicotine toxicity.
- Seizure with use of nicotine e-cigarettes.

Substantial evidence (strong data) that in non-smokers nicotine e-cigarette use leads to dependence on e-cigarettes.⁴

Social: Smoking and vaping can affect the social well-being and quality of life of individuals and communities, can reduce social interactions, increase stigma and discrimination, and create conflicts and inequalities among different groups of people. Smoking and vaping can also influence the norms, values, and behaviours of young people, who may perceive them as acceptable, desirable, or rebellious. The national Therapeutic Goods Administration has highlighted “evidence of vaping as a gateway to smoking” in January 2024.¹⁸

Environmental: Negative impacts on the environment from smoking and vaping include air pollution, water contamination, soil degradation, and wildlife endangerment. Cigarette butts are the most littered item on the planet, and they contain toxic chemicals that can leach into the environment.¹⁹ E-cigarette devices and cartridges pose risks from fire and environmental waste,⁴ often containing hazardous metals and materials, with accumulation of airborne particles in indoor environments.⁴

Use of vapes almost tripled between 2019 (2.5%) and 2022-2023 (7.0%).⁸ While Australia has historically had strong policies on tobacco and nicotine control, significant ground has been lost over the past decade regarding e-cigarettes. Recent measures announced by national, and some state and territory governments are starting to reverse this trend. **Victoria is playing catch-up and needs to act now.**

The causes and repercussions of the illicit tobacco and e-cigarette industry in Victoria including impacts on the Victorian justice system, and effective control options

Illicit Tobacco

The illicit tobacco industry in Victoria refers to the production, importation or distribution of tobacco and tobacco products that are not regulated, taxed, or compliant with the law.²⁰

Sourcing data on illicit tobacco trading is challenging due to its illegality and is further restricted by the absence of a tobacco sellers' licensing scheme in Victoria.²⁰

Causes of the illicit tobacco industry in Victoria include challenges with enforcement of current Victorian laws. A lack of clarity regarding roles and responsibilities of different agencies impacts effective enforcement, including whether illicit tobacco regulation is a health or criminal issue.²⁰ Low penalties and poor enforcement for illicit tobacco offences also reduce the deterrence and detection of offenders.²⁰

Illegal sales of e-cigarettes

Illegal sales of nicotine vaping products in Victoria are common in both tobacco retailers and specialist vape shops. Enforcement of Australia's long-standing and well-adhered to laws restricting the sale of 'schedule 4 – prescription only' substances has been significantly hampered in the case of nicotine vaping products. This is because the general retail sale of non-nicotine vaping products to anyone over 18 currently remains legal in all jurisdictions, except Western Australia. The difficulty of needing to distinguish nicotine-containing products from those which do not contain nicotine makes enforcement of the current controls on nicotine vaping products unworkable.

The proposed Federal reforms remove the regulatory distinction between nicotine and non-nicotine vaping products, making regulation of e-cigarettes much easier and more cost-effective to enforce.

Repercussions

The repercussions of the illicit tobacco trade are broad and numerous:

Increased health risks for Victorians – exposure to higher levels of toxins, contaminants, or unknown substances in illicit tobacco, particularly for young people.

Increased burden on health systems – potential increased smoking prevalence,⁸ addiction and disease.

Increased harm to the most disadvantaged Victorians – illicit tobacco reduces the power of taxation to encourage disadvantaged Victorians to decrease or cease their tobacco use.

Criminal activities - the 2022 Better Regulation Victoria Review into Victoria’s Approach to Illicit Tobacco Regulation highlights the current issue of organised crime using funds from the sales of illicit tobacco to operate other criminal activities at significant ongoing cost to the Victorian community.²⁰

Loss of revenue for the government – illicit tobacco trading impacts Australian Government revenue due to reduced Federal customs duty, decreasing funds for services and provisions to Victorians.

Increased environmental damage – like all tobacco, the cultivation and use of illicit tobacco impacts the environment through water pollution, fire hazards,⁴ deforestation and soil erosion.

Industry lobbying and manipulation - the tobacco industry continues to promote the narrative regarding illicit tobacco as part of its familiar ‘playbook’ tactics with the aim of influencing Government against effective tobacco legislation.

Impacts on the Victorian justice system

There is a need for collaboration and coordination among different agencies and jurisdictions, both from a Victorian and Federal perspective, to address the cross-border and international nature of the illicit tobacco industry.

Effective control options—tobacco

Regulatory change – to introduce a Victorian positive licensing scheme. Victoria is the only state in Australia that does not currently operate a licensing scheme. The impact of this is evident, with unmonitored and unregulated outlets appearing across Victoria. State regulatory changes would support and align with Federal measures to close current loopholes and tackle illicit tobacco across Victoria and nationally. PHAA acknowledges and supports the announcement made on March 28th, 2024, by the Victorian Government to introduce a Victorian tobacco retail licensing scheme.

Effective control options—e-cigarettes

Limit the supply - of all e-cigarette products regardless of nicotine content, to supply by pharmacies through the therapeutic access model.

Elimination or reduction of hazards and risks – The therapeutic access model to support smoking cessation via prescription from a clinician is yet to be fully utilised due to the widespread availability of illegal e-cigarette products. We reiterate that the widespread supply of illegal vaping products stems from the fact that it remains legal to supply ‘non-nicotine’ vaping products in almost all Australian jurisdictions. So called ‘non-nicotine’ vaping products are therefore able to act as the perfect vehicle for concealing illegal nicotine vaping products. The proposed Federal vaping reforms will directly address this issue and enable the therapeutic access model to operate as intended.

Advertising and marketing ban – including all forms of advertising, promotion and sponsorship for e-cigarettes.

Community education and support – ongoing support and services for those Victorians wishing to stop smoking or vaping.

The adequacy of the State and Commonwealth legislation, regulatory and administrative frameworks to minimise tobacco and e-cigarette harm experienced in the community and control illicit trade compared to other Australian and international jurisdictions

Tobacco

Currently, unlike other Australian jurisdictions, Victoria does not have a licensing system for the sale of tobacco.²² This is a serious failure of state governance, exposing Victorians to the current widespread trading of illicit tobacco and expansion of organised crime, with no effective means of law enforcement control. PHAA acknowledges and supports the announcement made on March 28th, 2024, by the Victorian Government to introduce a Victorian tobacco retail licensing scheme.

E-cigarettes

Current loopholes allow for e-cigarettes containing nicotine to be marketed as non-nicotine devices, creating challenges and increased costs for evidence collection, analysis, and presentation. This increases workload and complexity for law enforcement, who are responsible for monitoring compliance and detection of illegal vaping products.,

Commonwealth Response

The recently revised (2023) Australian Government position is to continue to allow access to vaping products for therapeutic purposes under the prescription model while prohibiting the importation of all non-prescription vapes, raising the minimum quality standards for vapes (by restricting flavours, colours, and other ingredients), introducing pharmaceutical-like packaging of vapes, reducing allowable nicotine concentrations and volumes, and prohibiting the sale of single-use disposable vapes.^{23,24}

The TGA has not approved any e-cigarette product for therapeutic use. The availability of liquid nicotine under this ‘prescription model’ is not an endorsement of any claims of therapeutic benefit, safety or harm reduction.^{4,25}

On March 21st, 2024, Federal Health Minister Mark Butler announced the Therapeutic Goods and Other Legislation Amendment (Vaping Reforms) Bill 2024.

Public Health Association Australia supports the Federal Government’s intention to:

- Stop importation, domestic manufacture, supply, advertising and commercial possession of non-therapeutic and disposable vapes (regardless of nicotine content).
- Introduce new criminal offences and civil penalty provisions to ensure that legal authorities have the necessary power to effectively enforce Australian laws.
- Reduce risks for those wishing to use e-cigarettes on prescription to assist with stopping smoking.

The effectiveness of current public health measures to prevent and reduce the harm of tobacco use and vaping in Victoria and potential reforms

Current public health measures

Current public health measures to prevent and reduce the harm of tobacco use and vaping in Victoria are being severely hampered by the currently exploited loopholes in legislation and regulation, together with significant funding and lobbying resources from the tobacco industry and other commercial actors.

Article 5.3 of the World Health Organization (WHO) Framework Convention on Tobacco Control (FCTC) calls for the exclusion of involvement by tobacco industry interests in policymaking relating to tobacco (including e-cigarettes and other novel nicotine products). This should be strictly upheld; however, the reality is big tobacco continues to wield significant influence over policy making and implementation.

Potential reforms

- Regulatory change – positive licensing system for the sale of tobacco in Victoria, in line with proposals announced by the Victorian Government on March 28th, 2024.
- Limit the supply of all e-cigarette products, regardless of nicotine content, to supply through the therapeutic access model from pharmacies via clinician prescription.
- Advertising and marketing ban including all forms of advertising, promotion and sponsorship for e-cigarettes and tobacco products.
- Enhanced monitoring and enforcement to tackle the illegal sale of e-cigarettes and other illegal nicotine products (e.g., nicotine pouches).
- No criminal offence for possessing or using a vape for individual use.
- Coordinated state and federal response with support for proposed Commonwealth vaping legislation introduced into Parliament in March 2024.
- Provide ongoing education and support for Victorians wishing to quit smoking and vaping use.

Any other related matters

The reforms discussed are only one component of the comprehensive, intersectoral approach that is required to address the complex harms and real threats to the health of Victorians from the tobacco and e-cigarette industry.

We urge the Victorian Government to introduce state laws to prohibit political donations by the tobacco and e-cigarette industry. The tobacco industry has a history of using retail groups, front groups and affiliated organisations to act on its behalf or take action to further its interests. Effective legislation prohibiting political donations by the industry should extend to the prohibition of political donations by any tobacco or e-cigarette industry business entity (including close associates, those who accept tobacco or e-cigarette industry funding themselves, or others with vested interests in the continuing sale or use of tobacco or e-cigarettes).

The Victorian Government needs to be proactive and act now to stop the tobacco and e-cigarette industry causing a new health crisis for all Victorians. Failure of policy and enforcement is sustaining the increasingly sophisticated targeting and tactics of the tobacco and e-cigarette industry, causing disproportionate harm to Victorian children and young people and the wider community.

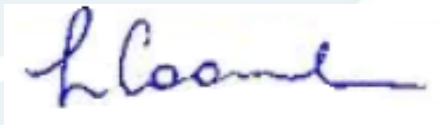
Conclusion

PHAA supports the broad direction of federal legislation regarding vaping and tobacco control. We urge the Victorian Government to act decisively to support the new federal measures. We are particularly keen to see the following measures in place in Victoria as soon as possible:

- An end to the supply of all e-cigarette products, regardless of nicotine content, except through the therapeutic access model from pharmacies via clinician prescription.
- Enhanced monitoring and enforcement to tackle the illegal sale of e-cigarettes and other illegal nicotine products (e.g., nicotine pouches).
- Creation of a positive Victorian licensing system for the sale of tobacco and vigorous enforcement and cooperation with national tax authorities and national and state crime authorities to tackle the illicit tobacco market in Victoria.
- Strengthening of state tobacco control legislation to eliminate any remaining forms of advertising, promotion, marketing and sponsorship of e-cigarettes and tobacco products.
- Provision of ongoing education and support for Victorians wishing to quit smoking and/or vaping.

The PHAA appreciates the opportunity to make this submission to the Victorian Parliamentary Inquiry into Vaping and Tobacco Control.

Please do not hesitate to contact me should you require additional information or have any queries in relation to this submission.



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Public Health Association of Australia

5 April 2024

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