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E-CIGARETTE IN DANGER:

REVISION OF THE EU DIRECTIVE ON TOBACCO IS TANTAMOUNT TO A BAN

On 19 December 2012 the European Commission published a proposal for the revision of the Tobacco Products Directive. In this document the first time the e-cigarette, was treated as a nicotine-containing product (short: NCP). They want to standardise a limit of 2 milligrams per consumption unit as well as a limitation of the absolute concentration of nicotine to 4 milligrams per millilitre. All products beyond this would have to be approved as a pharmaceutical product.

So, at a maximum concentration of 4 milligrams per milliliter, the unit is only allowed to contain a maximum of half a millilitre. What does that mean for us, the consumers?

Currently available nicotine-containing liquids contain at least 6 milligrams per millilitre. Higher concentrations of up to 36 milligrams per millilitre are common. The average consumer uses about 4 millilitres per day. Assuming that people switching to the e-cigarette tend to use a higher concentration of 18 milligrams per millilitre this results in 72 milligrams of nicotine per day.

With freely available products in accordance to the directive with consistent consumption only 16 milligrams would be possible - just less than 1/5. Conversely the consumption would have to be raised to 18 millilitres in order to maintain level. This would parallel 36 freely available units.

But not only the liquid itself would be affected. The equipment is concerned too. The popular eGo for example holds at least 0.8 ml, more efficient vaporisers even up to 6 millilitres of liquid. Thus more than one unit must be used to hold up the intended operation of the equipment in any case - this of course is based on the assumption that liquid is sold in fluid units of 0.5 millilitres.

Viewed factually this proposal is tantamount to a ban on vaping as we know it. Stopping the smoking of tobacco, maintaining the ritual as well as the supply of nicotine will no longer be possible. Only a totally unsatisfactory rest of what we look upon as our alternative to tobacco smoking will be left over.

Why are nicotine-containing products added to the tobacco directive if there is no evidence of harm?

Why are nicotine-containing products only allowed below the nicotine limit of drugs for smoking cessation ?

Why is an agent limit defined for a “medicinal product by presentation” in the tobacco directive?

Why is there no attempt to harmonise the different treatments concerning nicotine containing products in each country in the appropriate directives?

We demand a regulation of nicotine-containing products as a luxury food apart the tasks of tobacco control. Also the reference to the pharmaceutical directive is unsatisfactory. Replacing the consumption of nicotine from burning tobacco by the consumption of nicotine from vaporised liquids does not constitute medical treatment, since nicotine can not have any medicinal effects against tobacco addiction.

We demand a regulation in consideration of the market established since 2006 and in consideration of about 7 million people in Europe who found an alternative for themselves in enjoying nicotine using the e-cigarette.

We demand to acknowledge in health-care politics that consuming nicotine with electronic smoking is considerably less harmful than tobacco smoking, thus relieving the strain on public health-care and strengthening the European public health.

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