

Public Consultation on Disposable Vaping Devices

Details of consultation:

The Minister of State at the Department of Environment, Climate and Communications, Ossian Smyth, TD invites the public to participate in the following consultation. Feedback will help to inform Ireland's policy response to dealing with waste disposable vaping devices.

Important Note: Disposable vapes are electronic cigarettes that are NOT rechargeable. Rechargeable cigarettes are outside the scope of this consultation.

RCPI consultation response:

Below are the key points for consultation response (submitted via the consultation portal/survey on 27th July 2023).

Two submissions were made via the portal, one from the RCPI Policy Group on Tobacco and one from the Faculty of Paediatrics

Start of submission:

The Policy Group on Tobacco of the Royal College of Physicians of Ireland/ Faculty of Paediatrics supports a ban on disposable vapes because of the harms caused to the environment and their disproportionate usage among children and young people.

Evidence supporting this view is outlined below,

1. Environmental harm

- The product design of disposable vaping devices is inherently unsustainable. The design of most vaping products makes it difficult to take them apart (1)¹, which means they are unlikely to be appropriately recycled. Recycling will always be labour intensive and expensive, which is why it makes sense to ban them outright.
- They are a major contributor to litter. One UK study found that 50% of single use vapes are thrown away. In the UK, this equates to 1.3 million single-use vapes/week, which in one year is enough to cover 22 football pitches. (2)²
- The battery in disposable vapes is a fire risk when not properly discarded. (3)³

¹ [Disposable vapes – a challenge to the recycling sector - IEMA](#)

² [One million single use vapes thrown away every week contributing to the growing e-waste challenge in the UK - Material Focus](#)

³ Pourchez, J. From smoking to vaping: a new environmental threat? The Lancet Respiratory Medicine. 2022
HYPERLINK "[https://www.thelancet.com/journals/lanres/article/PIIS2213-2600\(22\)00187-4/fulltext](https://www.thelancet.com/journals/lanres/article/PIIS2213-2600(22)00187-4/fulltext)"[From smoking to vaping: a new environmental threat? - The Lancet Respiratory Medicine](#)

- Devices contain hazardous heavy metals (e.g., mercury, lead and bromides) and other toxic chemicals (battery acid, lithium, nicotine), which leach into the environment when not properly discarded. (4,5) ^{4 5}
- A single use vape contains approximately 0.15g of lithium, a precious metal.
 - o Its usage in disposable vapes wastes resources that are needed for greener transport. Lithium is a key component in electric car batteries. UK research found that annually, approximately 10 tonnes of lithium is wasted from discarded disposable vapes – the equivalent of 1,200 electric vehicle batteries. (2)²
 - o The mining of lithium has led to water loss, ground destabilisation, biodiversity loss, increased salinity of rivers, contaminated soil, and toxic waste. (6,7) ^{6 7}
- Disposable vapes are a source of single use plastic which contribute to land and marine pollution. (8) ⁸

2. Usage of disposable vapes among young people

- E-cigarette use among young people in Ireland is high and increasing. 11% of under 25-year-olds use them either daily or occasionally. (9) ⁹ The European Schools Project for Alcohol and Other Drugs (ESPAD) 2019 report found that, in Ireland, 37% of 16-year-olds had tried vaping and 15% reported current use. (10) ¹⁰
- We do not currently have Irish data that breaks down usage to product type. However, data from ASH UK shows:
 - o That the use of e cigarettes in 11–17-year-olds increased from 11.2% in 2021 to 15.8% in 2022. This rise coincided with a significant rise in use of disposable vape products among adolescents. (11)¹¹
 - o The most popular type of e-cigarette amongst 11–17-year-olds were disposable e-cigarettes, with 52.0% of respondents favouring this device, compared with 7.7% in 2021. (11)¹¹

⁴ Matthew Chapman. Rise of single-use vapes sending tonnes of lithium to landfill. July 2022. The Bureau of Investigative Journalism. <https://www.thebureauinvestigates.com/stories/2022-07-15/rise-of-single-use-vapes-sending-tonnes-of-lithium-to-landfill>

⁵ Krause MJ, Townsend TG. Hazardous waste status of discarded electronic cigarettes. Waste Manag. 2015;39:57–62

⁶ [The Environmental Impacts of Lithium and Cobalt Mining | Earth.Org](https://www.earth.org/the-environmental-impacts-of-lithium-and-cobalt-mining/)

⁷ <https://wellcomecollection.org/articles/YTdnPhiAACIAGuF3>

⁸ Maquart et al. Plastic pollution and infectious diseases. The Lancet Planetary Health. October 2022.

⁹ Healthy Ireland Survey 2022 Summary Report [e31b2aaa-a8d7-411d-8b62-02cca079c741.pdf \(www.gov.ie\)](https://www.gov.ie/en/publications-and-statistics/publication/e31b2aaa-a8d7-411d-8b62-02cca079c741/)

¹⁰ ESPAD Report 2019. Results from the European School Survey Project on Alcohol and Other Drugs. ESPAD report 2019. Results from the European School Survey Project on Alcohol and Other Drugs

¹¹ Use of e-cigarettes (vapes) among young people in Great Britain. 2022. <https://ash.org.uk/uploads/Use-of-e-cigarettes-among-young-people-in-Great-Britain-2022.pdf> <https://ash.org.uk/uploads/Use-of-e-cigarettes-vapes-among-adults-in-Great-Britain-2022.pdf?v=1661865959>

- That in 2023, 69% said the most frequently used device was a disposable (single-use) vape. (12)¹²
- That among 18–24-year-olds, almost half of current e-cigarettes users (48%) used disposables as their main type in 2022, an increase from 2.8% in 2021. (13) ¹³.
- The marketing, advertising and flavours of disposable vapes targets a younger market. (13,14) ^{12 14}

3. Health concerns

- Disposable vapes are not harmless products. The World Health Organization (WHO) states that e-cigarettes are harmful to health. (15) ¹⁵
- Most e-cigarettes contain nicotine which is highly addictive, and exposure of children and adolescents to nicotine can lead to long-term negative impacts on brain development, as well as addiction. (16) ¹⁶
- A Health Research Board (HRB) report found that acute effects can include poisonings, burns, blast injuries, lung injury and asthmatic attacks. (17) ¹⁷

¹² [ASH-response-call-for-evidence-June-2023-FINAL.pdf](#)

¹³ Use of e-cigarettes (vapes) among adults in Great Britain. 2022. <https://ash.org.uk/uploads/Use-of-e-cigarettes-vapes-among-adults-in-Great-Britain-2022.pdf?v=1661865959>.

¹⁴ Royal College of Paediatrics and Child Health. Policy briefing: Vaping in young people. Jun 2023. <https://www.rcpch.ac.uk/sites/default/files/generated-pdf/document/Policy-briefing%253A-Vaping-in-young-people-.pdf>

¹⁵ [E-cigarettes are harmful to health \(who.int\)](#)

¹⁶ [Tobacco: E-cigarettes \(who.int\)](#)

¹⁷ [New HRB evidence shows e-cigarettes are associated with adolescents starting to smoke tobacco cigarettes](#)

- Systematic review level evidence has demonstrated an association between use of e-cigarettes in children and adolescents and other health problems including asthma (18,19)¹⁸, mental health problems (20)²⁰, cough (21)²¹, alcohol use (22)²² and marijuana use (23)²³.
- Aerosols in most electronic nicotine delivery systems (ENDS) contain toxic substances. They are associated with increased risk of cardiovascular diseases, lung disorders and adverse effects on foetal development. (16)¹⁶ There is also a risk to those in close proximity to e-cigarettes users who are also exposed to emissions from the aerosol discharged.
- There are several reports of disposable vape products breaching legal nicotine levels.
 - o The Elf bar brand, one of the most popular disposable e-cigarette brands in Ireland was recalled in three major supermarkets in the UK after investigations found that they contained 50 per cent more than the legal limit of nicotine of 2ml. (24)²⁴.
 - o The HSE's National Tobacco Control Office have submitted several RAPEX alert notifications to Safety Gate (the EU rapid alert system for dangerous non-food products) after discovering that a range of disposable vape products contain more than the permitted amount of nicotine (20mg/ml or 2%), with levels up to 50.4mg/ml detected. (25)²⁵

4. Smoking initiation among e-cigarette users

- A systematic review carried out in Ireland by the Health Research Board, demonstrates clearly that there is a gateway effect of vaping (an association between e-cigarettes and initiation of cigarette smoking amongst non-smokers). The research showed that those adolescents who had ever used an e-cigarette were between three and five times more likely to start smoking compared to those who never used e-cigarettes. (26)²⁶.

¹⁸ Wills TA, Soneji SS, Choi K, Jaspers I, Tam EK. E-cigarette use and respiratory disorders: an integrative review of converging evidence from epidemiological and laboratory studies. *Eur Respir J*. 2021 Jan 21;57(1):1901815.

¹⁹ Li X, Zhang Y, Zhang R, Chen F, Shao L, Zhang L. Association Between E-Cigarettes and Asthma in Adolescents: A Systematic Review and Meta-Analysis. *Am J Prev Med*. 2022 Jun;62(6):953-960.

²⁰ Becker, Tim & Arnold, Melanie & Ro, Vicky & Martin, Lily & Rice, Timothy. (2020). Systematic Review of Electronic Cigarette Use (Vaping) and Mental Health Comorbidity Among Adolescents and Young Adults. *Nicotine & tobacco research : official journal of the Society for Research on Nicotine and Tobacco*. 23. 10.1093/ntr/ntaa171.

²¹ Bourke M, Sharif N, Narayan O. Association between electronic cigarette use in children and adolescents and coughing a systematic review. *Pediatr Pulmonol*. 2021 Oct;56(10):3402-3409

²² Ava N. Rothrock, Halle Andris, Sarah B. Swetland, Valeria Chavez, Shira Isaak, Maria Pagane, Jake Romney & Steven G. Rothrock (2020) Association of E-cigarettes with adolescent alcohol use and binge drinking-drunkenness: A systematic review and meta-analysis, *The American Journal of Drug and Alcohol Abuse*, 46:6, 684-698, DOI: 10.1080/00952990.2020.1771723

²³ Chadi N, Schroeder R, Jensen JW, Levy S. Association Between Electronic Cigarette Use and Marijuana Use Among Adolescents and Young Adults: A Systematic Review and Meta-analysis. *JAMA Pediatr*. 2019 Oct 1;173(10):e192574.

²⁴ Davies, Kieran. (2023). Elf Kick Why have Elf bar vapes been recalled and are they going to be banned. *Irish Sun*. Available here: <https://www.thesun.ie/health/10205443/elf-bars-recalled-banned/>

²⁵ [HSE Environmental Health Service takes market surveillance action against certain disposable e-cigarettes - HSE.ie](https://www.hse.ie/eng/press/2023/23050101.htm)

²⁶ Health Research Board. 2020. Electronic cigarette use and tobacco cigarette smoking initiation in adolescents: An evidence review.

5. Smoking Cessation

- Health claims that e-cigarettes are effective smoking cessation aids are not supported by scientific evidence.
- E-cigarettes are not licensed stop smoking medicines in Ireland. Compared to nicotine replacement therapy (NRT) and prescription treatments, e-cigarettes are not considered a safe or effective method for smoking cessation. (27) ²⁷
- National Clinical Guidelines on Smoking cessation, endorsed by the Minister for Health (28) ²⁸, state that no e-cigarettes have been authorised for use for smoking cessation in Ireland and advise that people who want to stop smoking can be supported to do so with the dual approach of behavioural support from qualified stop smoking advisors and evidence-based pharmaceutical supports. (29) ²⁹
- Other smoking cessation aids, which forms part of the National Clinical Guidelines on Smoking cessation, endorsed by the Minister for Health, are proven to be more effective at helping people quit smoking and have a lesser environmental impact.

6. Alignment With Stated National Policy

- A ban on disposable vapes is aligned with the Government's Circular Economy Strategy. (30) ³⁰

7. Public attitudes to banning disposable vapes

- An IPSOS MRBI poll commissioned by the Irish Heart Foundation in July 2023 found that across all age groups, there was a majority in favour of banning single-use vapes.

²⁷ [Vaping \(using e-cigarettes\) - HSE.ie](#)

²⁸ <https://www.gov.ie/en/press-release/6b64a-ministers-donnelly-and-feighan-welcome-publication-of-the-national-clinical-effectiveness-committees-national-clinical-guideline-no-28-stop-smoking/>

²⁹ Stop Smoking. National Clinical Guideline No. 28. Department of Health, January 2022 [95fe179c-b59b-4891-819b-0b1d42e1117d.pdf \(www.gov.ie\)](#)

³⁰ <https://assets.gov.ie/207622/bd90130d-494e-4d32-8757-46d36c77b912.pdf>

References

- (1) [Disposable vapes – a challenge to the recycling sector - IEMA](#)
- (2) [One million single use vapes thrown away every week contributing to the growing e-waste challenge in the UK - Material Focus](#)
- (3) Pourchez, J. From smoking to vaping: a new environmental threat? The Lancet Respiratory Medicine. 2022 HYPERLINK "[https://www.thelancet.com/journals/lanres/article/PIIS2213-2600\(22\)00187-4/fulltext](https://www.thelancet.com/journals/lanres/article/PIIS2213-2600(22)00187-4/fulltext)" [From smoking to vaping: a new environmental threat? - The Lancet Respiratory Medicine](#)
- (4) Matthew Chapman. Rise of single-use vapes sending tonnes of lithium to landfill. July 2022. The Bureau of Investigative Journalism. <https://www.thebureauinvestigates.com/stories/2022-07-15/rise-of-single-use-vapes-sending-tonnes-of-lithium-to-landfill>
- (5) Krause MJ, Townsend TG. Hazardous waste status of discarded electronic cigarettes. Waste Manag. 2015;39:57–62
- (6) [The Environmental Impacts of Lithium and Cobalt Mining | Earth.Org](#)
- (7) <https://wellcomecollection.org/articles/YTdnPhIAACIAGuF3>
- (8) Maquart et al. Plastic pollution and infectious diseases. The Lancet Planetary Health. October 2022.
- (9) Healthy Ireland Survey 2022 Summary Report [e31b2aaa-a8d7-411d-8b62-02cca079c741.pdf \(www.gov.ie\)](#)
- (10) ESPAD Report 2019. Results from the European School Survey Project on Alcohol and Other Drugs. ESPAD report 2019. Results from the European School Survey Project on Alcohol and Other Drugs
- (11) Use of e-cigarettes (vapes) among young people in Great Britain. 2022. <https://ash.org.uk/uploads/Use-of-e-cigarettes-among-young-people-in-Great-Britain-2022.pdf> <https://ash.org.uk/uploads/Use-of-e-cigarettes-vapes-among-adults-in-Great-Britain-2022.pdf?v=1661865959>
- (12) [ASH-response-call-for-evidence-June-2023-FINAL.pdf](#)
- (13) Use of e-cigarettes (vapes) among adults in Great Britain. 2022. <https://ash.org.uk/uploads/Use-of-e-cigarettes-vapes-among-adults-in-Great-Britain-2022.pdf?v=1661865959>.
- (14) Royal College of Paediatrics and Child Health. Policy briefing: Vaping in young people. Jun 2023. <https://www.rcpch.ac.uk/sites/default/files/generated-pdf/document/Policy-briefing%253A-Vaping-in-young-people-.pdf>
- (15) [E-cigarettes are harmful to health \(who.int\)](#)
- (16) [Tobacco: E-cigarettes \(who.int\)](#)
- (17) [New HRB evidence shows e-cigarettes are associated with adolescents starting to smoke tobacco cigarettes](#)
- (18) Wills TA, Soneji SS, Choi K, Jaspers I, Tam EK. E-cigarette use and respiratory disorders: an integrative review of converging evidence from epidemiological and laboratory studies. Eur Respir J. 2021 Jan 21;57(1):1901815.
- (19) Li X, Zhang Y, Zhang R, Chen F, Shao L, Zhang L. Association Between E-Cigarettes and Asthma in Adolescents: A Systematic Review and Meta-Analysis. Am J Prev Med. 2022 Jun;62(6):953-960.
- (20) Becker, Tim & Arnold, Melanie & Ro, Vicky & Martin, Lily & Rice, Timothy. (2020). Systematic Review of Electronic Cigarette Use (Vaping) and Mental Health Comorbidity Among Adolescents and Young Adults. Nicotine & tobacco research : official journal of the Society for Research on Nicotine and Tobacco. 23. 10.1093/ntr/ntaa171.
- (21) Bourke M, Sharif N, Narayan O. Association between electronic cigarette use in children and adolescents and coughing a systematic review. Pediatr Pulmonol. 2021 Oct;56(10):3402-3409
- (22) Ava N. Rothrock, Halle Andris, Sarah B. Swetland, Valeria Chavez, Shira Isaak, Maria Pagane, Jake Romney & Steven G. Rothrock (2020) Association of E-cigarettes with adolescent alcohol use and binge drinking-drunkness: A systematic review and meta-analysis, The American Journal of Drug and Alcohol Abuse, 46:6, 684-698, DOI: 10.1080/00952990.2020.1771723

- (23) Chadi N, Schroeder R, Jensen JW, Levy S. Association Between Electronic Cigarette Use and Marijuana Use Among Adolescents and Young Adults: A Systematic Review and Meta-analysis. JAMA Pediatr. 2019 Oct 1;173(10):e192574.
- (24) Davies, Kieran. (2023). Elf Kick Why have Elf bar vapes been recalled and are they going to be banned. Irish Sun. Available here: <https://www.thesun.ie/health/10205443/elf-bars-recalled-banned/>
- (25) [HSE Environmental Health Service takes market surveillance action against certain disposable e-cigarettes - HSE.ie](#)
- (26) Health Research Board. 2020. Electronic cigarette use and tobacco cigarette smoking initiation in adolescents: An evidence review.
- (27) [Vaping \(using e-cigarettes\) - HSE.ie](#)
- (28) <https://www.gov.ie/en/press-release/6b64a-ministers-donnelly-and-feighan-welcome-publication-of-the-national-clinical-effectiveness-committees-national-clinical-guideline-no-28-stop-smoking/>
- (29) Stop Smoking. National Clinical Guideline No. 28. Department of Health, January 2022 [95fe179c-b59b-4891-819b-0b1d42e1117d.pdf \(www.gov.ie\)](#)
- (30) <https://assets.gov.ie/207622/bd90130d-494e-4d32-8757-46d36c77b912.pdf>