

## **Health (Miscellaneous Provisions) Bill – Call for Evidence**

The Royal College of Physicians of Edinburgh (the College) is pleased to respond to the call for evidence from the Committee for Health, Social Services and Public Safety on the Health (Miscellaneous Provisions) Bill.

### **PART 1 - Regulation of sale of nicotine products and tobacco**

#### **Clause 1: Prohibition of sale of nicotine products to persons under 18**

The College supports the prohibition of sale of nicotine products to persons under 18, which would include nicotine vapour products/e-cigarettes. We also support the creation of an offence in relation to the proxy purchasing of nicotine products, as this is a significant means of obtaining cigarettes for many young smokers.

#### **Clause 2: Prohibition of sale of nicotine products from vending machines**

The College supports the prohibition of sale of nicotine products from vending machines, meaning that nicotine vapour products are subject to the same restriction as traditional cigarettes, whose purchase from vending machines was banned a number of years ago. This prohibition is important in preventing young people from accessing nicotine products.

#### **Clause 3: Amendments consequential on sections 1 and 2**

#### **Clause 4: Amendment of the Order of 1991**

The College supports these changes to prohibit the sale of nicotine products to those under 18, and to standardise the penalty for doing so.

#### **Clause 5: Interpretation of Part 1**

The College supports this clause which defines nicotine products to include e-cigarettes and other nicotine vapour products.

### **Other comments**

Although not covered by this Bill, the College would like to note that we believe that nicotine vapour products should be subject to the same restrictions as tobacco products, for example, they should be banned from use in enclosed public spaces. A paper published by the American Industrial Hygiene Association 'White Paper: Electronic Cigarettes in the Indoor Environment'<sup>1</sup> highlights a number of concerns, including the lack of regulation and quality control of the devices; chemical exposures to bystanders; and the lack of good evidence about exposure to many of the flavourings, etc, employed in e-cigarettes. The paper concludes that while they may carry lower risks than tobacco cigarettes, there is not currently enough evidence of their safety.

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<sup>1</sup> [https://www.aiha.org/government-affairs/Documents/Electronic%20Cig%20Document\\_Final.pdf](https://www.aiha.org/government-affairs/Documents/Electronic%20Cig%20Document_Final.pdf)