

Submission to the Health Select Committee on the

Smokefree Environments and Regulated Products Amendment Bill (No 2)

4 October 2024

Summary

ASPIRE Aotearoa strongly supports the intention of the Bill and most of the changes proposed.

If properly implemented and enforced, the proposed changes will help reduce young people's exposure to vaping products and remove access to their product of choice: inexpensive disposable vapes. We believe this change will reduce uptake of vaping among young people.

However, we are concerned about:

- the broad definition of 'disposable vaping products' (Clause 4) which is likely to have unintended adverse consequences;
- the failure to disallow importation of disposable products (Clause 7);
- the failure to reduce the number and density of existing vape retailers (general and specialist) and regulate their proximity to sensitive sites;
- less stringent protection of early childhood services from proximity to new specialist vape retailers (SVRs) (Clause 8);
- the failure to disallow discounting of vaping products by SVRs (Clause 13); and
- lack of resources provided to the Ministry of Health to pursue prosecutions, and limited powers available to Smokefree Enforcement Officers.

These omissions mean that the Bill, as currently drafted, misses opportunities to reduce the accessibility, affordability and appeal of vaping products for young people. We believe that adequate protection of young people requires a more rigorous and more comprehensive approach.

Summary of Recommendations

We recommend that:

1. the additional purpose of the Act reads 'to greatly reduce access to regulated products by children and young people'.
2. the definition of 'regulated products' in the Act is expanded to include all nicotine products sold as consumer goods.
3. the Bill uses the narrower definition of 'disposable vaping products' recommended by the Ministry of Health in its Regulatory Impact Statement.
4. excise taxation is used to ensure that vaping products are not available at 'pocket money' prices, and to incentivise use of lower-nicotine (i.e. less addictive) products.
5. further consideration is given to including 'importation for sale' of disposable vaping products in section 20FA.

6. Ministry of Health resources for pursuing prosecutions under SERPA are increased to enable comprehensive enforcement.
7. powers available to SFEOs are increased so they can take local action against non-compliant retailers, e.g., seize non-compliant stock, issue instant fines.
8. the Ministry of Health publishes an Annual Report detailing monitoring and enforcement undertaken, complaints received, warnings and fines issued, and prosecutions taken.
9. the proximity limit of SVRs from early childhood education centres is set at 300 metres.
10. detailed community engagement is undertaken, particularly with Māori, Pacific and low income communities, aimed at developing policies to limit vape store numbers and density as quickly and equitably as possible.
11. section 33(4) is repealed, removing the exception that allows SVRs to offer discounts, giveaways, loyalty promotions, and introductory offers on vaping products.
12. online stores are required to use an approved third-party age verification system.
13. the Government introduces mandatory standardised (black and white) packaging for vaping products and any future nicotine products approved for sale.
14. alongside stronger vaping regulation, the Government introduces robust measures to greatly reduce smoked tobacco products' availability.
15. the Government excludes tobacco and nicotine product manufacturers from influencing its policy development, in line with Article 5.3 of the Framework Convention on Tobacco Control (FCTC).
16. the Government upholds its responsibilities under FCTC article 5.3 and excludes all commercial actors from influencing policy making; furthermore, any engagement for the purpose of ensuring workable policy implementation should be transparently reported.
17. consultation with Māori and Pacific is prioritised, and equity considerations are paramount in the decision-making process.

About ASPIRE Aotearoa

ASPIRE Aotearoa was established in 2011 as a partnership between major Aotearoa New Zealand research groups carrying out tobacco control research to help achieve the Smokefree Aotearoa 2025 goal equitably. Our research focuses on policy measures that have the potential to substantially reduce smoking prevalence and smoking-related inequities by greatly reducing the appeal and addictiveness, availability, and affordability of cigarettes and tobacco. ASPIRE comprises 18 researchers and numerous affiliates, led by co-directors are Professor Janet Hoek, Associate Professor Andrew Waa (Ngāti Hine, Ngāpuhi), and Professor Richard Edwards. ASPIRE members have a range of disciplinary backgrounds and bring diverse expertise, including policy analyses, epidemiology, document analyses, qualitative methods, survey research, and kauapapa Māori methods.

1. Intention of the Bill and Purpose of the SERPA Act

We strongly support the intention of the Bill ‘to strengthen the regulatory framework for vaping to better protect young people.’

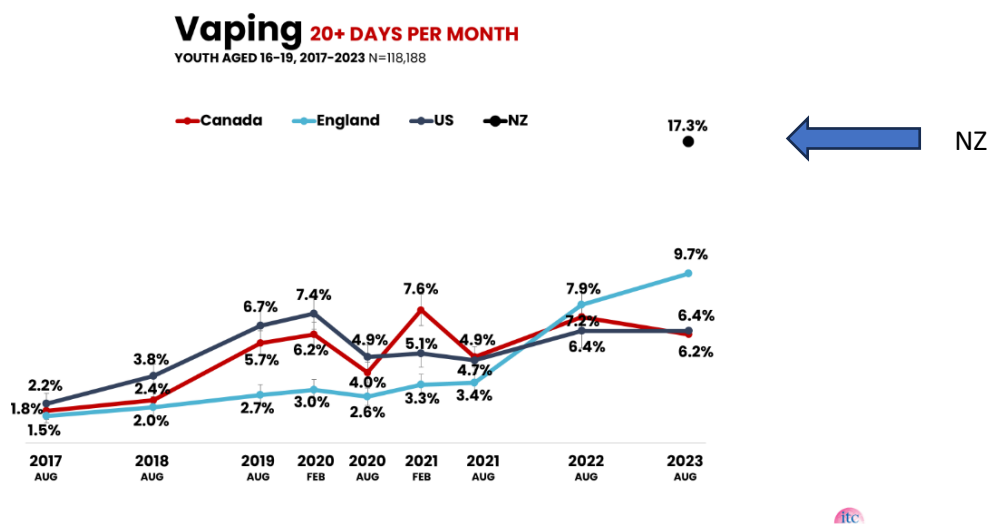
We strongly support adding a new purpose to the Smokefree Environments and Regulated Products Act (SERPA) ‘to reduce access to regulated products by children and young people.’ However, we recommend this reads ‘to greatly reduce access to regulated products by children and young people’.

We are pleased the purpose of Act relates to all regulated products. It is vitally important to minimise children’s and adolescents’ access to smoked tobacco products, heated tobacco products, and indeed any nicotine products that could cause addiction and negatively impact the developing brain (Leslie, 2020). To future-proof the legislation, we recommend expanding the definition of ‘regulated products’ in the Act to include all nicotine products sold as consumer goods. We strongly oppose introducing additional commercial nicotine products (e.g. pouches, pearls, lozenges, gummies, toothpicks) given the lack of evidence these support smoking cessation.

The Bill’s rationale is sound. We note that vaping among young people aged 15 to 17 has continued to rise despite the 2020 Vaping Amendment Act and subsequent regulation changes. The most recent (2022/23) New Zealand Health Survey reported 20% of young people aged 15 to 17 vaped currently (at least monthly) and 15.4% vaped daily (Ministry of Health, 2023). These figures represent a more than six-fold increase in daily vaping prevalence over three years (from 2.3% in 2019/20).

Furthermore, youth vaping prevalence in Aotearoa is very high relative to other countries (Fig 1). The 2023 ITC Youth and Young Adult Survey found that regular vaping (20+ days in last month) among Aotearoa youth (16-19 years) was 17.3%, nearly twice as high as estimates from England (9.7%), and almost three times as high as Canadian (6.2%) and the US (6.4%) (Hammond D et al., 2024).

Figure 1: Prevalence of vaping 20+ days per month, 16-19 year olds, international comparison from the ITC Youth and Young Adult Survey, 2017-2023¹



¹ New Zealand was included in the survey for the first time in 2023, therefore vaping prevalence for New Zealand is shown as a single 2023 data point.

The Year 10 Snapshot survey conducted by ASH NZ provides evidence that youth vaping is not spread evenly across society; Māori and Pacific children are much more likely to vape nicotine daily compared to other ethnic groups, and more likely to experience related harms (ASH (NZ), 2023). Overall, 22.3% of Māori 14-15 year olds surveyed reported daily vaping with 26.6% of Māori girls vaping daily (ASH (NZ), 2023). Strong and pro-equity measures are vital, if we are to reduce the harms and inequities associated with youth vaping.

Although nicotine vaping is less physically harmful than tobacco smoking and may help some people to stop smoking, there is growing evidence that nicotine vaping is harmful, particularly to children and adolescents (the vast majority of whom have never smoked cigarettes regularly). Vaping is highly addictive and can harm young people's mental wellbeing (Becker et al., 2021; Graham-DeMello et al., 2024; Kang & Malvaso, 2024; Lechner et al., 2017). Studies have also shown that vaping negatively affects the respiratory, cardiovascular, and immune systems, impairs oral health and harms the developing brain (Abreu-Villaca et al., 2003; Camoni et al., 2023; Keith & Bhatnagar, 2021; Leslie, 2020; Livingston et al., 2022; Overbeek et al., 2020; Seiler-Ramadas et al., 2021; Tackett et al., 2024; Wold et al., 2022; Yang et al., 2020).

2. Prohibiting disposable vaping products

We strongly support prohibiting sales of disposable vaping products, which we define as single-use devices that cannot be refilled or recharged. This measure is justified given the strong youth preference for these products. As shown in Figure 2, 65% of 16-19 year olds who vape currently in Aotearoa report that disposable vapes are the device type they use most often, and an additional 16% used 'multiple products' likely including disposable vapes (Hammond D et al., 2024). The equivalent figures for 16-17-year-olds were 58% using disposable vapes and 23% multiple products.²

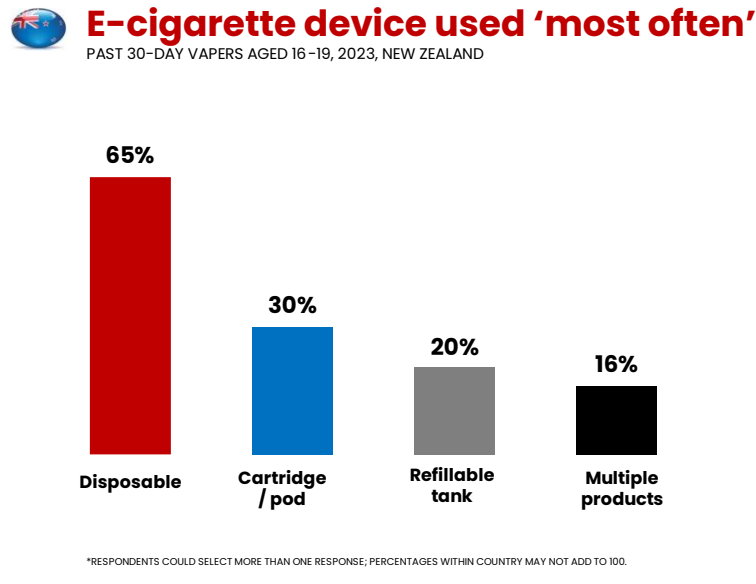
In contrast, our Oct- Dec 2022 ITC Survey of adults who smoke or recently quit shows that disposable vapes were less popular among adults than youth. Among adults who vaped and still smoked, only 26% used disposable vapes, and among adults who vaped and had recently quit smoking, only 15% used disposable vapes (unpublished findings). This evidence suggests that disallowing sales of disposable vapes is likely to reduce youth vaping uptake, without having a major effect on adults using vapes to stop smoking.

While disposable vapes have the cheapest price per unit (\$10 or less), other product types are generally more economical in the long term. Therefore, prohibiting disposable vapes will not financially disadvantage people using vaping to stop tobacco smoking. Disallowing disposable vapes has a logical parallel with policies restricting sales of single cigarettes and packs containing 10 cigarettes. These products were less economical than packs containing 20 or 25 cigarettes but had a lower price point and were therefore favoured by minors and disallowed in Aotearoa for that reason.

Disallowing disposable vapes is also justified on environmental grounds, as the electronic, lithium battery and plastic waste they produce is highly problematic (Pourchez et al., 2022).

² Due to the small numbers of current vapers aged 16-17 years participating in the survey (n=69), the confidence intervals for these estimates are wide (44-71% or +/- 14%).

Figure 2: Device used most often, 16-19 year olds, New Zealand, ITC Youth and Young Adult Survey, 2023



3. Definition of 'disposable vaping products'

Although we support disallowing disposable vapes, we are concerned the Bill uses an overly broad definition of 'disposable', which captures 'pod' and 'cartridge' products favoured by adults who use vaping as an alternative to smoking. The Bill's definition of disposable vapes differs from the definition recommended by the Ministry of Health in the Regulatory Impact Statement (RIS) and is out of step with international definitions. We recommend the Bill uses the narrower definition of 'disposable vaping products' recommended by the Ministry of Health in its Regulatory Impact Statement.

The New Zealand ITC Wave 4 survey (conducted Oct-Dec 2022) found rechargeable devices with pre-filled pods, caps or cartridges were the most popular product type among adults using vaping as a quitting aid and were used by 38% of those who vaped and continued to smoke (Table 1).

Table 1: Type of vaping device used most often among adults who currently smoke and use e-cigarettes at least monthly

Type	Number	Weighted percentage (95% confidence interval)
It is disposable, not refillable (battery is non-rechargeable)	133	25.7 (21.4, 30.6)
It uses pre-filled pods, caps, or cartridges that must be replaced when they are empty (battery is rechargeable)	172	37.6 (32.4, 43.0)
It uses re-fillable pods, caps, or cartridges (battery is rechargeable)	121	21.8 (17.8, 26.5)
It has a tank that you fill with liquids (battery is rechargeable)	84	14.9 (11.5, 19.1)
Total	510	

In addition, prefilled pod/cartridge devices were used by 30% of adults who had recently quit smoking and vaped at least monthly (Table 2).

Table 2: Type of vaping device used most often among adults who recently quit smoking and use e-cigarettes at least monthly

Type	Number	Weighted percentage (95% confidence interval)
It is disposable, not refillable (battery is non-rechargeable)	48	14.6 (10.3, 20.4)
It uses pre-filled pods, caps, or cartridges that must be replaced when they are empty (battery is rechargeable)	72	29.9 (22.6, 38.5)
It uses re-fillable pods, caps, or cartridges (battery is rechargeable)	81	33.7 (26.3, 41.9)
It has a tank that you fill with liquids (battery is rechargeable)	62	21.7 (16.1, 28.7)
Total	263	

As use of prefilled pods/cartridges is relatively high among adults who smoke or recently quit, disallowing these products may detrimentally affect progress towards the Smokefree2025 goal, if it results in current users reverting to smoking. Refillable products appear to be less acceptable to people who smoke. For example, an earlier ITC study (undertaken in 2018 when refillable ‘tank’ devices dominated the market) found that a third (33.6%) of people who smoked and who had discontinued vaping in the last year did so because they found vapes too complicated to use (Edwards et al., 2020; White et al., 2020).

Furthermore, from a safety perspective, ‘open’ refillable systems have disadvantages over ‘closed’ systems such as prefilled pods/cartridges. For example, refillable products are associated with accidental poisoning of children who drink the e-liquid; in the USA such cases declined following the introduction of closed ‘pod’ devices (e.g. JUUL) from 2015 (Wang et al., 2020). Refillable devices were also associated with acute lung injury (EVALI) in the US due to use of contaminated ‘bootleg’ or homemade e-liquids, particularly those containing THC (Kiernan et al., 2021). Additionally, low quality devices and modifiable devices may be at greater risk of explosion (Kaltenborn et al., 2023). Allowing ONLY these higher-risk products in the NZ market may be counterproductive.

Given how easily the vaping industry circumvents regulations and brings inexpensive new products to market, it is likely that low priced products will continue to be available regardless of bans on particular product types. For example, a recent audit found refillable starter packs for as little as \$15 (Ball J et al., 2024).

If the policy aims to ensure vapes are not available at ‘pocket money prices’, applying a specific excise tax (i.e., that significantly increases the price but retains a favourable price advantage for vaping products relative to smoked tobacco products) would be more effective than disallowing specific product types. Additionally, basing excise tax levels on nicotine strength (just as the taxation of alcoholic beverages is based on alcohol content) could provide a financial incentive for consumers to use lower nicotine (i.e., less addictive) products. This approach may help reduce addiction among young people (who tend to use the cheapest products available) and would complement measures outlined in the Bill. We note that the Ministry of Health advised in the RIS that a ban on disposable vapes would be more effective if combined with other measures such as excise tax. We recommend that excise taxation is used to ensure that vaping products are not available at ‘pocket money’ prices, and to incentivise use of lower-nicotine (i.e. less addictive) products.

4. Disallowing importation of disposable vapes

We note that the Bill prohibits the sale, offer of sale, manufacture, supply and distribution of disposable vaping products. However, it does not prohibit ‘importation for sale’. The proposed wording of Section 20FA differs in this regard from similar sections in SERPA (e.g. section 54, which prohibits the importation for sale of oral tobacco products). We are concerned that if importation is

allowed, a black market for these products may develop, as there will be no powers to stop shipments of disposable vapes at the border.

We recommend that further consideration is given to including 'importation for sale' of disposable vaping products in section 20FA.

5. Measures to increase penalties for unlawful sales

We strongly support increased penalties for unlawful sales of regulated products to minors, which signals the seriousness of this offence. However, we note that increased fines will only act as a deterrent if retailers believe they are likely to be caught and prosecuted.

Enforcement and prosecution efforts to date have been very weak. According to the RIS, only three individuals/organisations have been charged to date, despite controlled purchase operations in 2023-2024 revealing that 15% of vape retailers (i.e. over 1000 stores nationwide) had sold vaping products to minors. Despite efforts to bolster front line enforcement staff, we understand that the enforcement system is not yet working well, due in part to the Ministry of Health team responsible for pursuing prosecutions being cut dramatically. Smokefree Enforcement Officers (SFEOs) have very limited ability to act when they discover noncompliance. They cannot issue fines and must send infringement information to the Ministry of Health to action. We are aware of several cases where egregious breaches have been reported to the Ministry by SFEOs, with no apparent action taken by the Ministry of Health. Inaction sends a clear message to vape retailers that they may violate the rules with apparent impunity. Simply increasing fines without making comprehensive changes to the enforcement system will not be effective.

To improve the enforcement system and ensure increased penalties work as intended we recommend that Ministry of Health resources for pursuing prosecutions under SERPA are increased to enable comprehensive enforcement. We recommend that powers available to SFEOs are increased so they can take local action against non-compliant retailers, e.g., seize non-compliant stock, issue instant fines. We recommend that the Ministry of Health publishes an Annual Report detailing monitoring and enforcement undertaken, complaints received, warnings and fines issued, and prosecutions taken.

6. Measures to reduce visibility of vaping products

We strongly support measures to reduce the visibility of vaping products, and close marketing loopholes that currently exist.

Our position is based on strong evidence that the 'denormalisation' of tobacco has played a key role in reducing youth smoking (Chapman & Freeman, 2008), and that point-of-sale display bans have helped to reduce smoking prevalence internationally (He et al., 2018). There is every reason to believe that reducing the retail visibility of vaping products will have a similar denormalising effect and will likely reduce youth vaping uptake.

We support the repeal of section 24(l), which currently allows SVRs to communicate about vaping products to their 'existing customers' because this marketing loophole allows SVRs to email promotions to young people about new products, flavours, price promotions and loyalty schemes with youth appeal. Examples of such promotions are provided in the Appendix. Many SVR websites allow people to sign up to receive promotions using a tick a box to say they are over 18 and an 'existing customer'; proof of purchase or age verification is rarely, if ever, required hence minors are likely to be receiving such promotional material.

7. Proximity restrictions and retail availability

We support introducing a proximity limit that prevents new SVRs from operating within a defined distance from Early Childhood Education. However, a 100m limit is inadequate. In addition, the Bill lacks measures to reduce the number and density of existing vape stores.

Regulations introduced in 2023 established proximity limits for new SVRs, which could not be located within 300m of schools and marae after August 2023. The current Bill adds a further condition: new SVRs will not be allowed within 100m of Early Childhood Education (ECE) centres.

It is not clear why this additional limit has been set at 100m, and not 300m as for schools and marae. A consistent distance of 300m would simplify implementation and enforcement. Children attending ECE centres are highly impressionable, which makes it crucial that they are not exposed to products such as vaping (or tobacco) products as they go to and from their centre. Furthermore, a consistent approach would reinforce the message that vaping products pose harms to young people of any age. Ministry of Health advice in the RIS notes that extending the existing proximity limit to ECEs would virtually cap SVR store numbers. Given the current oversupply of vape retailers, we believe this outcome is highly desirable. We recommend that the proximity limit of SVRs from ECEs is set at 300 metres.

We are concerned that the proximity limit applies neither to general retailers nor to SVRs established prior to the regulation; this loophole means children, particularly those in low socioeconomic areas, will continue to be exposed to numerous vape stores. For example, people from the Northland town of Kaikohe report they have 17 vape retailers within about 700-meters of each other on the main street (6 SVRs and 11 GVRs), all within 450-600m of schools.

The Bill fails to reduce SVR numbers, which now exceed 1,200; nor does it limit the number of retailers selling vaping products overall, which is estimated at over 7,000 according to the RIS. Given the rapid proliferation of vape stores, and their concentration in socioeconomically disadvantaged areas, we recommend that detailed community engagement is undertaken, particularly with Māori, Pacific and low-income communities, aimed at developing policies to limit vape store numbers and density as quickly and equitably as possible.

The ITC NZ Youth and Young Adult survey found that, despite the minimum age of purchase of 18 years, 82% of respondents aged 16-17 years who reported current vaping had bought vapes or vaping products like pods, cartridges or e-liquids in the last year.³ The most common places where these products had been bought were dairies (47%), specialist vape stores (41%) or from family or friends (34%)² (Reid & Hammond, 2024). This finding indicates that vaping products are very easily accessible to youth through vape retailers. Reducing the number of retailers and their proximity to places where young people congregate would help to restrict the supply of these products and their uptake and use among youth. It would also support other measures in the Bill aimed at denormalising and reducing the visibility of vapes to children.

Options to reduce the number of vape retailers include restricting the sale of vaping products to SVRs or to pharmacies. This measure would reduce their availability to youth while simultaneously retaining access for people who smoke; pharmacies could also advise people on how they might effectively transition away from smoking. A formal licensing scheme could control vape store numbers and

³ Due to the small numbers of current vapers aged 16-17 years participating in the survey, these estimates have large margin of error +/-12-13%.

locations, and provide an additional enforcement mechanism (i.e., it would allow for licence removal from non-compliant retailers). An additional measure would be to disallow any vape store to operate within 300 metres of the boundary of an intermediate, secondary school or kura kaupapa Māori. This measure would help to reduce the visibility and sales of vaping products to the age group at greatest risk of vaping uptake.

8. Importance of disallowing discounting of vaping products

Clause 13 of the Bill amends Section 33 of SERPA to clarify that SVRs cannot provide disposable vaping products free of charge or at a reduced price. This change is immaterial, given Section 20FA completely disallows the sale and supply of disposable products. Section 33 continues to allow SVRs to provide other vaping products free of charge or at a discount, which is inconsistent with apparent attempts to remove very cheap products from the market in other parts of the Bill. Cheap products appeal to young people, who report making retail purchases, despite being under 18 (Frost et al., 2024).

A recent study found many retailers used heavy price discounting to offload outdated (non-compliant) stock (Ball J et al., 2024). Examples of price promotions are provided in the Appendix. Disallowing price discounting is vital to prevent product dumping and promotions that make vaping products more affordable for young people. We strongly recommend that 33(4) is repealed, removing the exception that allows SVRs to offer discounts, giveaways, loyalty promotions, and introductory offers of vaping products.

9. Additional measures to protect young people

We acknowledge that the measures in the Bill go further than previous regulations and, with proper implementation and strong enforcement, is likely to reduce vaping uptake among children and youth by reducing their exposure to vaping products and removing access to product-types they favour.

A minority of youth report buying vaping products from online stores e.g. 6.8%⁴ of current vapers aged 16-17 years reported buying these products online in the last year in the 2023 ITC Youth and Young Adult survey (Reid & Hammond, 2024). Online purchases are likely to increase if supply through physical vape stores is reduced by restricting their numbers or location, and through stricter monitoring and enforcement. The Bill does not set out mandatory age verification procedures for online retailers to prevent sales to minors; we recommend requiring online stores to use an approved third-party age verification system.

Vaping products use brightly coloured packaging and visually appealing designs to appeal to young people. The Bill misses an opportunity to require standardised (black and white) packaging, which would reduce vaping products' appeal to young people (Gomes et al., 2024; Taylor et al., 2023). An international study comparing the impact of standardised packaging found it reduced interest among young people but not among people who smoke (Taylor et al., 2023). We recommend the Government introduce mandatory standardised (black and white) packaging for vaping products and any future nicotine products approved for sale.

10. Regulation proportional to risk

As a general principle, smoked tobacco products should be regulated more stringently than vaping products, given they pose more physical harms (Edwards et al., 2024). This logic does not support lax

⁴ 95% confidence interval 0% - 13.9%

vaping regulation but rather means measures to strengthen vaping regulation should be accompanied by measures that increase regulation of smoked tobacco products.

The Government has said it remains committed to the Smokefree 2025 goal, which includes reducing smoking prevalence *and tobacco availability* to minimal levels. However, since the goal was set by the National-led government in 2011 no measures have been introduced to restrict the retail availability of smoked tobacco products. As a result, smoked tobacco products remain available in around 6000 dairies, convenience stores, petrol stations, and supermarkets. Outlet numbers are greater in more disadvantaged areas (Marsh et al., 2013).

We recommend that, alongside stronger vaping regulation, the Government introduces robust measures to greatly reduce smoked tobacco products' availability.

11. Robust process, implementation, enforcement and monitoring

As well as developing a more comprehensive strategy, we recommend that the Government excludes nicotine product manufacturers from influencing its policy development, in line with Article 5.3 of the Framework Convention on Tobacco Control. In addition, we recommend that the Government upholds its responsibilities under FCTC article 5.3 and excludes all commercial actors from influencing policy making; furthermore, any engagement for the purpose of ensuring workable policy implementation should be transparently reported.

We note that legislation will be ineffective if it is not carefully implemented and rigorously enforced. Problems have arisen with SERPA regulations that are difficult to understand and interpret, including for the regulator. For example, when an ASPIRE researcher contacted the Ministry's vaping regulatory authority to query whether a specific product met regulations for "removable batteries" the equivocal response was it "may not be meeting the intention" of the regulation. Similarly, industry representatives have complained to the Health Committee of receiving different responses from different people at the Ministry to questions about the regulations. Legislation and regulations must be unambiguous, have a clear rationale, and be clearly and consistently communicated.

Unfortunately, the vaping industry has learned that non-compliance has few, if any, consequences. Significant enforcement efforts will be needed to change industry culture and remove non-compliant actors.

Policy evaluation and timely monitoring of youth vaping and smoking are vital to assess the impacts of the new measures and act rapidly if they fail to equitably reduce youth vaping or result in adverse consequences (e.g. a rise in tobacco smoking).

Youth vaping disproportionately affects Māori and Pacific whānau and communities. Therefore, we recommend that consultation with Māori and Pacific is prioritised, and equity considerations are paramount in the decision-making process.

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APPENDIX: EXAMPLES OF PROMOTIONAL MATERIAL SENT BY SVRs TO CUSTOMERS

From: AIRSCREAM NZ

Date: 20 Sept 2024

Email subject line: Hurry! Get Your Free AirsPops 13000 Pod Today!

AIRSCREAM

**The AirsPops 13000 Available
NOW!**



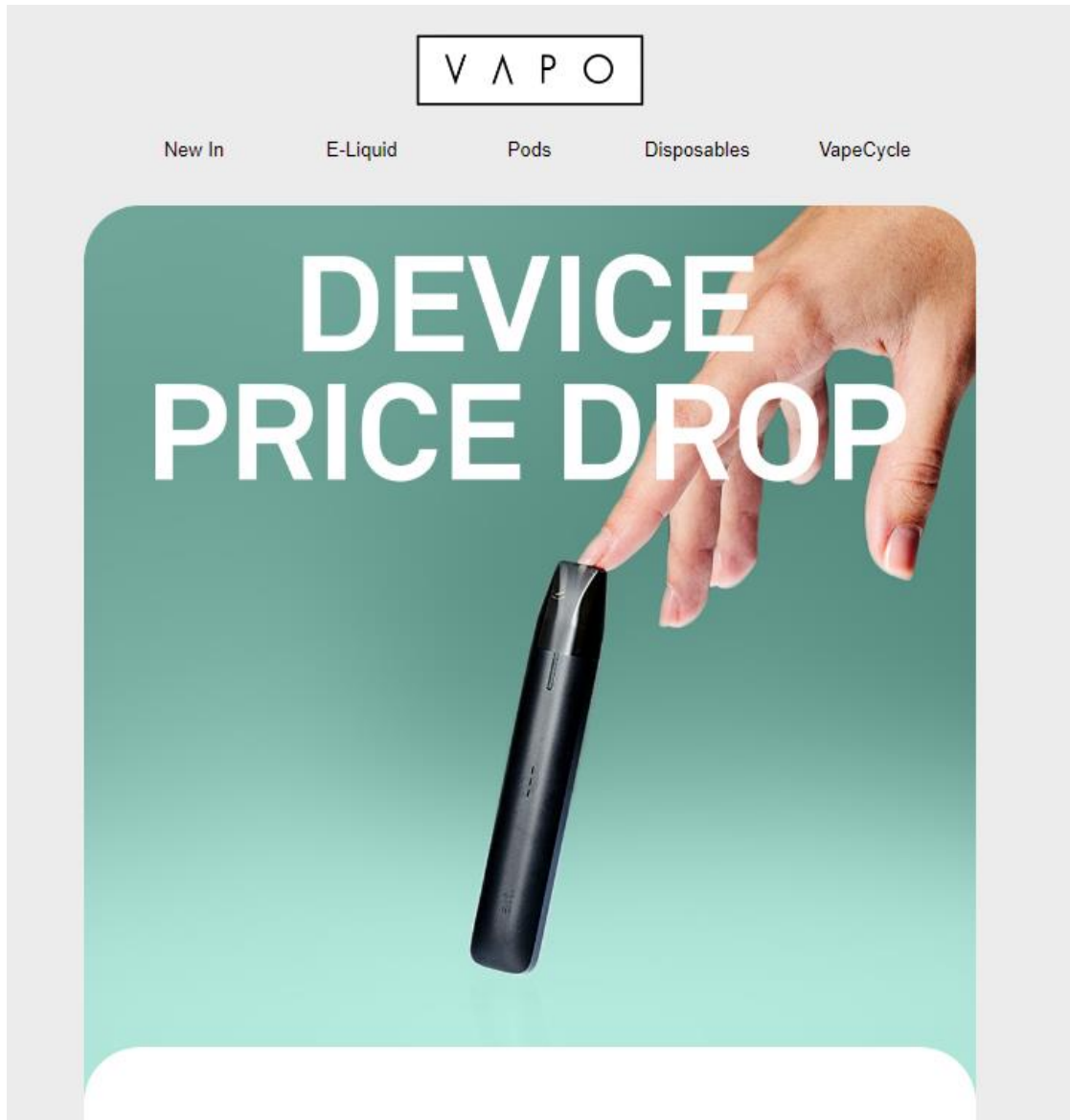
AIRSCREAM NZ Online Store 13000 Exclusive Offer

Enjoy a FREE AirsPops 13000 new flavour pod when you purchase from the AirsPops 13000 range on AIRSCREAM.CO.NZ
(Limited once per order)

From: Vapo

Date: 19 August 2024

Subject: 📣 Get more alt. for less!



Save big with the satisfying alternative!

We've dropped the price of alt. Device Edition 2 and alt. Starter Kits to make way for an updated device that complies with upcoming government regulations.

Get alt. today and take advantage of a clearout like you've never seen before!

The device price drop is **only while stocks last** and will not be extended.



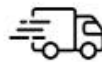
[SHOP NOW](#)



ZIP
BUY NOW,
PAY LATER



EARN POINTS
AND REDEEM
REWARDS



FREE SHIPPING
ON ALL ORDERS
OVER \$50

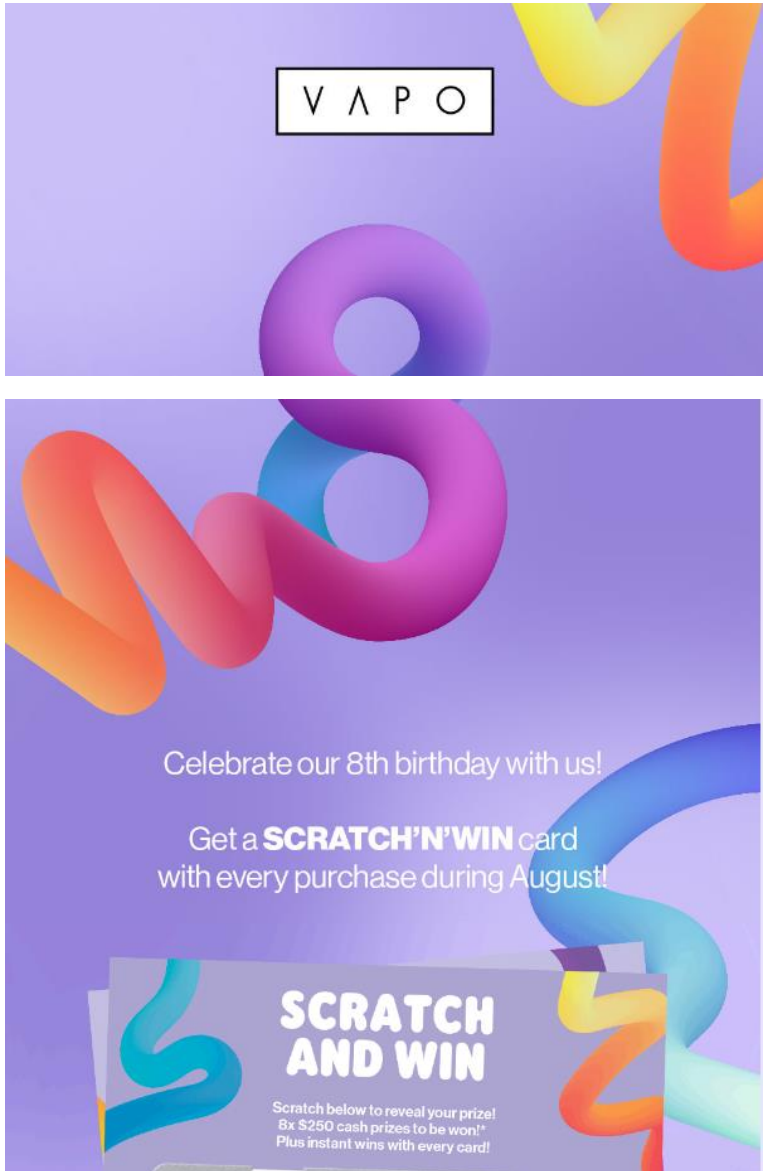


RECYCLE YOUR
USED VAPES
FOR FREE

From: Vapo

Date: 13 August 2024

Subject: Want \$250 cash?



A promotional graphic with a purple background. At the top, a grey banner reads "YOU'VE WON!". Below it, small text provides terms and conditions. The main text reads "8 CHANCES TO WIN \$250" in large white and blue letters. A hand on the left holds a black disposable vape. To the right, it says "800 ALT. NU DISPOSABLES TO BE WON" and "1200 PUFFS". A large, stylized number "8" is on the left side.

YOU'VE WON!

Promotion runs from 1st - 31st August 2024. All prizes / codes will be supplied within the promotional period or while stocks last and must be redeemed before 30th September 2024. All prizes / codes are valid for 1 use only and cannot be combined or used in conjunction with any other offer. Promotion is strictly R18 and all scratch card recipients will need to be over 18 years of age to redeem any prize. Full T&C's online at <https://www.aspire.co.nz/pages/vapo-birthday-terms-conditions>

8 CHANCES TO WIN
\$250

800
ALT. NU DISPOSABLES
TO BE WON
1200 PUFFS



From: AIRSCREAM

Date: 23 November 2023

Subject: Black Friday Exclusive Clearance

AIRSCREAM

Are you Set for your Holiday? Disposables are about to be banned in New Zealand. It is your last chance to stock up on your favourite items in our crazy clearance price!

Grab your beloved AirsPops ONE USE while you can!

Offer Ends on 30/11/2023

**Set4Holiday
6ml Sale**

2 of 6ml ONE USE Mesh For
Only \$6

2 For \$6

AirsPops ONE USE 6ML Set of 2 for \$6

Ends on: 30/11/2023

T&C Apply

*Selected Flavours
*While Stock Last
*No Return & No Refund
*NZ Only
*T&C APPLY

BUY NOW

Set4Holiday 12ml Sale

2 For \$12

AirsPops ONE USE 12ML Set of 2 for \$12

Ends on: 30/11/2023

2 of 12ml ONE USE Mesh For
Only \$6!

*Selected Flavours
*While Stock Last
*No Return & No Refund
*NZ Only
*T&C APPLY

BUY NOW

Set4Holiday 3ml Sale

3 For \$5

AirsPops ONE USE 3ML Set of 3 for \$5

Ends on: 30/11/2023

3 of 3ml ONE USE For Only
\$5!

*Selected Flavours
*While Stock Last
*No Return & No Refund
*NZ Only
*T&C APPLY

BUY NOW