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[www.tholosfoundation.org](http://www.tholosfoundation.org)

August 15, 2022

To:  
Minister Stephen Donnelly  
Department of Health  
Leinster House, Kildare Street, Dublin 2

From:  
Tholos Foundation  
722 12<sup>th</sup> Street NW  
4<sup>th</sup> Floor  
Washington, D.C. 20005

Dear Minister Donnelly,

I write to you today regarding the Oireachtas Health Committee report that recommended a flavor ban on nicotine-containing vaping products. I understand the report is due to be further scrutinized later this year but felt it important to share some concerns on the potential consequences of the recommendation.

Vaping products have been proven to be significantly less harmful than cigarettes and are [estimated](#) to be 70% more effective than nicotine replacement therapies in getting smokers to quit. Flavors have been crucial in making them **the world's premier tool of smoking cessation**.

Ireland has a goal of becoming tobacco-free by 2025. With a current smoking prevalence of 17%, that goal is unlikely to be reached, but banning flavors will actively put the brakes on smokers quitting and could push vapers back to smoking or to alternative solutions.

The Tholos Foundation recently commissioned extensive [polling](#) by Ipsos in a number of European countries to study the effects of vaping flavor bans. In Estonia, where flavors other than tobacco and menthol have been banned since 2020, the data was striking: despite the ban, almost 60% of Estonian vapers still use banned flavors (particularly fruit flavors). Of those, 42% reported mixing their own flavors and 42% reported turning to the black market. Homemade and illegal products are untested and unregulated, thereby exposing users to a greater risk of harm. The starkest consequences of which were seen in 2019 with the hospitalization of over 1,000 Americans following a spike in the use of homemade/illegal cannabis-containing liquids that contained vitamin E acetate.

The Oireachtas report states clearly that “all flavors except for tobacco should be prohibited”. The reasoning for this proposal is based on claims of a youth vaping epidemic. However, evidence from across the globe suggests that not only are claims of a youth vaping epidemic unsubstantiated, but flavor bans are proven to lead to increased youth smoking. I would like to draw your attention to San Francisco, where a flavor ban was implemented in 2018. A [study](#) from Yale University’s Dr. Abigail Friedman found that the ban led to youth smoking rates in the city more than doubling following decades of continuous decline.

The Tholos Foundation collaborated on a [white paper](#) that explored the issue of whether flavored vaping products are effective as well as measured restrictions. It found that there are clearer solutions to concerns around underage use of vaping products. At present, Ireland does not have a minimum purchase age for vaping products, which should be addressed in the first instance and combined with effective enforcement and robust age verification of both online and in-store purchases.

There is great potential for Ireland to embrace harm reduction. One in five Irish adults smokes cigarettes daily, an [estimated](#) 714,000 people. Until recently, their chances of quitting smoking were low due to ineffective nicotine replacements like gum, patches, or oral spray. With technological development came vaping products, [invented](#) for smokers by smokers, which offer nicotine without the thousands of deadly chemicals present in cigarettes.

Successful public policy is always based in evidence. The UK’s Royal College of Physicians [says](#) that vaping is at least 95% less harmful than cigarettes and more than one hundred of the world’s leading public health organizations have [endorsed](#) vaping as safer than smoking.

Prohibitions on flavors for vaping products lack scientific justification. It is in the interests of all who support a smoke-free Ireland that this proposal never becomes law.

Sincerely,

Karl Abramson  
*Consumer Issues Fellow*  
Tholos Foundation

Attachments:

[Vaping Flavor Bans – Estonia](#)  
[Analysis of Flavored Vaping Products as a Harm Reduction Method](#)