

8. Fails to show benefits for adolescents and address concerns it may cause harm to young people

Flawed justification for banning flavours to protect youth. The justification rests largely on the idea that banning vaping flavours will have a protective effect for Dutch youth. However, the justification for benefits for youth is very weak and the challenges substantial. It does not establish flavours as a causal factor in youth vaping – though banning *nearly all* flavours will make the products less attractive to *everyone*, including adults and smokers. In its assessment of the reasons for adolescent e-cigarette use, the US Centers for Disease Control and Prevention identified several factors more important than flavours, notably curiosity.¹ The table below is a simplified version of Table 6 in the CDC report: *Reasons for e-cigarette use among middle and high school students who reported using e-cigarettes and other tobacco products during the past 30 days — National Youth Tobacco Survey, United States, 2019*

Reason given (top 5 only)	E-cig only users	E-cig and other tobacco users
I was curious about them	56.1%	38.4%
Friend or family used them	23.9%	22.2%
They are available in flavors, such as mint, candy, fruit, or chocolate	22.3%	26.6%
I can use them to do tricks	22.0%	29.0%
They are less harmful than other forms of tobacco, such as cigarettes	17.0%	19.1%

Will anti-vaping controversy stimulate youth vaping? If the government proceeds with this measure, it should brace for increased adolescent curiosity in vaping flavours. The proposed measure may attract young users to the controversy and make matters worse – at least this cannot be ruled out. It is notable that the United States, the country with the highest intensity of ‘moral panic’ about adolescent vaping, also has the among the highest measured youth vaping prevalence.

Flavours do not seem important to non-users. To the extent there is evidence, it suggests that flavours are not an important motivation to *non-users*. In one study, when teenage subjects were asked to rate their interest in using e-cigarettes on a scale of 0-10 when offered in a list of flavours, they reported minimal interest, reaching an average interest score of only 0.41 out of 10.² Where studies report the

¹ Wang TW, Gentzke AS, Creamer MLR, et al. Tobacco product use and associated factors among middle and high school students-United States, 2019. *MMWR Surveill Summ* [Internet] 2019 [cited 2021 Jan 17];68(12):1–22. [[link](#)]

² Shiffman S, Sembower MA, Pillitteri JL, Gerlach KK, Gitchell JG. The impact of flavor descriptors on nonsmoking teens’ and adult smokers’ interest in electronic cigarettes. *Nicotine Tob Res* 2015; published online Jan 7 [[link](#)][[release](#)].

motivation of teenage users, *harm reduction* is an important reason for young people vaping.^{3 4} It is not surprising that anyone who already vapes says they like the flavours, but that does not mean they started because of flavours (few young people start smoking or drinking because the flavours appeal to them). It would be more concerning if they continued to vape while not liking the flavours.

Look for deeper explanations. The causes of adolescent vaping and smoking are probably lodged deep in psychological motivations. One US study analysed youth smoking and vaping data and found:⁵

While e-cigarette use rises, understanding the underlying reasons why youth and adults use e-cigarettes is important for policy efforts. This study found two overarching factors, “alternative to cigarettes” and “larger social environment”, which combine sub-categories to explain main motivators of e-cigarette use.

The study then listed sub-factors in order of strength. In this ‘factor analysis’ of PATH data, “It comes in flavors I like” was merely the sixth most prominent factor in the “alternative to cigarettes” category:

1. They don’t smell
2. They might be less harmful to me than cigarettes
3. They might be less harmful to people around me than cigarettes
4. Using them help people to quit smoking
5. They are more acceptable to non-tobacco users
6. It comes in flavors I like/liked
7. [...] several other factors of lower prominence

Banning flavours will not make the demand go away. These analyses do not suggest that flavours are irrelevant, but that other factors may maintain the appeal and demand for vaping. These factors make it more likely that adolescent users will either just use the tobacco flavour or seek supply-side options to access banned flavoured products (black market, cross-border, home mixing etc.). See section 7 on the perverse consequences of regulation above.

Suppressing demand for adolescent e-cigarette use may be harmful. Even if the policy works as intended and teenage vaping decreases, there is a further link in the chain of reasoning to establish whether this is public health measure for youth. That is the effect on youth behaviours of the intervention, including relapse to smoking or reduced displacement of smoking by vaping, as discussed in Section 5 on the gateway effect.

³ Shiffman S, Sembower MA. PATH Data: Harm Reduction is Teens' Top Reason for Using e-cigarettes, Poster SRNT, Florence March 2017 [\[link\]](#)

⁴ Ambrose BK, Day HR, Rostron B, Conway KP, Borek N, Hyland A, et al. Flavored Tobacco Product Use Among US Youth Aged 12-17 Years, 2013-2014. *JAMA*. American Medical Association; 2015 Nov 3;314(17):1871. [\[link\]](#)

⁵ Nicksic NE, Snell LM, Barnes AJ. Reasons to use e-cigarettes among adults and youth in the Population Assessment of Tobacco and Health (PATH) study. *Addict Behav* [Internet] 2019;93:93–99. [\[link\]](#)