

Kristina Mauer-Stender
Programme Manager Tobacco Control
WHO Regional Office for Europe
UN City
Marmorvej 51
DK-2100 Copenhagen Ø
Denmark

Vorstand:
Dustin Dahlmann (Vorsitz)
Thomas Mrva, Frank Hackeschmidt
Amtsgericht Hamburg VR 23543

Postbank • BIC: PBNKDEFF
IBAN: DE07 7001 0080 0660 5818 03

Via email at: eurotobaccofree@who.int

Berlin, 29th January 2020

Warnings and assessments of e-cigarette

Dear Ms Mauer-Stender,

I am writing you as the president of the “Bündnis für Tabakfreien Genuss” (BfTG e.V.) a German vaping business association that exists and operates in independence from Tobacco companies and – much more important – as a former smoker who successfully switched to e-cigarettes after failing countless times with conventional NRT’s.

Under the title *E-cigarettes: how risky are they?* the WHO published assessments on various questions about vaping. While we think that it is very important to have a vivid discussion about vaping in tight comparison to smoking there were several remarks which surprised or even irritated us as these stand in strong contrast to our perception of the state of the art of e-cigarettes’ scientific discussion.¹ In deep respect for the WHO and in hope for a clarifying discourse, we would like to add to the following questions posed in the aforementioned statement:

*Are e-cigarettes and other vaping products dangerous? and
Are e-cigarettes more dangerous than regular cigarettes?*

E-cigarettes are 100% tobacco-free. They vaporize tobacco-free liquids, so called e-liquids. Tobacco products on the other hand burn tobacco. Tobacco smoke contains about 4,800 chemical substances, of which about 250 are poisonous and 90 carcinogenic. According to scientists at the University of Victoria, of 79 toxins in tobacco smoke. Of these 79 a number of 61 do not occur at all in e-liquids. E-cigarettes are 95 percent less harmful than tobacco (harm reduction) according to studies by the British Public Health England (PHE). They carry less than

¹ WHO: E-cigarettes: how risky are they?, 20.01.2020, who.int

0.5 percent of the cancer risk of tobacco cigarettes, according to PHE. Scientists from the University of Catania, led by Prof. Polosa, found no adverse effects in the health of daily e-cigarette users in two three-year studies. These findings were substantiated by another long-term study financed by Cancer Research UK.²

Are secondhand ENDS emissions dangerous?

While we want to stress the fundamental difference between heated tobacco products and per se tobacco-free vaping products, several studies have proven that the vapor of an e-cigarette, unlike tobacco smoke, does not release carcinogenic substances such as formaldehyde or acetaldehyde that could harm people in a secondhand perspective. According to the Fraunhofer Wilhelm-Klauditz-Institute, the measured concentration of formaldehyde in the vapor of an e-cigarette corresponds to the human breathing air. In addition, the Committee for Risk Assessment of the European Chemicals Agency (ECHA) has classified the main e-liquid component propylene glycol as not irritating to the respiratory tract. Cancer Research UK and the Scientific Service of the British Parliament also see no health risk from secondhand vaping. Cancer Research UK concludes: „Unlike second-hand smoke from cigarettes – which is known to cause cancer – there’s no evidence that second-hand e-cigarette vapour is dangerous to others.”³

Do e-cigarettes (ENDS) cause lung injuries?

A long-term study by Prof. Riccardo Polosa (University of Catania) showed that even among intensive users of e-cigarettes no evidence of incipient damage to the lungs and bronchial tubes could be found. There is also no evidence of changes in blood pressure or heart rate in the test subjects. Polosa's team accompanied 16 persons over a period of three and a half years. A second three-year study by Prof. Polosa suggests that vaping may reverse some of the damage caused by tobacco smoking in patients with chronic obstructive pulmonary disease (COPD). Polosa's team examined 44 COPD patients (ex-smokers) who vaped exclusively or are dual users.⁴

Furthermore, the renowned Royal College of Physicians points out the harm reduction effect of the e-cigarette in its internationally respected publication "Nicotine without smoke: Tobacco harm reduction". In addition, the experts provide comprehensive information on the significant reduction of risks and exposure of the respiratory tract and organs.⁵

² PHE: Evidence review, 2018, PHE publications gateway Nr. 2018769, gov.uk; PHE: E-cigarettes: an evidence update, 2015, gov.uk; Polosa, R. u.a.: Health effects in COPD smokers who switch to electronic cigarettes, Int J Chron Obstruct Pulmon Dis. 2018, 13, doi: [10.2147/COPD.S161138](https://doi.org/10.2147/COPD.S161138); Polosa, R. u.a.: Health impact of E-cigarettes, Scientific Reports volume 7, Article number: 13825 (2017), doi: [10.1038/s41598-017-14043-2](https://doi.org/10.1038/s41598-017-14043-2); Shahab, L. u.a.: Nicotine, Carcinogen, and Toxin Exposure in Long-Term E-Cigarette and Nicotine Replacement Therapy Users, Ann Intern Med., 2017, 166(6), DOI: [10.7326/M16-1107](https://doi.org/10.7326/M16-1107); Cancer Research UK: Pressemitteilung vom 06.02.2017, cancerresearchuk.org

³ Schripp, T. u.a.: Does e-cigarette consumption cause passive vaping?, Indoor Air 1/2013, doi: [10.1111/j.1600-0668.2012.00792.x](https://doi.org/10.1111/j.1600-0668.2012.00792.x); Johnson, J. u.a.: Air monitoring at large public electronic cigarette events, Int J Hyg Environ Health, April/2018, doi: [10.1016/j.ijheh.2018.02.003](https://doi.org/10.1016/j.ijheh.2018.02.003); Scungio, Mauro u.a.: Measurements of electronic cigarette-generated particles, JAeroSci, Januar/2018, doi: [10.1016/j.jaerosci.2017.10.006](https://doi.org/10.1016/j.jaerosci.2017.10.006); ECHA: Annex to a news alert ECHA/NA/16/37, Helsinki, 13 December 2016, echa.europa.eu; Cancer Research UK: 10 common questions about e-cigarettes answered, Science Blog, 17.05.2016, cancerresearchuk.org; House of Parliament: Postnote Nr.533 August 2016, parliament.uk

⁴ Polosa, R. u.a.: Health effects in COPD smokers who switch to electronic cigarettes, Int J Chron Obstruct Pulmon Dis. 2018, 13, doi: [10.2147/COPD.S161138](https://doi.org/10.2147/COPD.S161138); Polosa, R. u.a.: Health impact of E-cigarettes, Scientific Reports volume 7, Article number: 13825 (2017), doi: [10.1038/s41598-017-14043-2](https://doi.org/10.1038/s41598-017-14043-2)

⁵ Royal College of Physicians: Nicotine without smoke, 2016, S. 79ff., rcplondon.ac.uk

In addition, the U.S. Food and Drug Administration (FDA) has lifted its general warning on conventional e-cigarettes after identifying illegal THC-containing liquids as the cause of the significant health incidents in North America. The illegal substances associated with the US incidents – including vitamin E acetate – are banned in Germany and Europe. The US regulation is not comparable with the legislation in Germany and Europe. BfR (Federal Office for Risk Assessment) President Andreas Hensel commented in the German Stern magazine: "According to current knowledge, consumers of e-cigarettes in Germany are not threatened with increased risks if they use products that comply with European and German regulations."⁶

Do ENDS help you quit smoking?

According to the DEBRA study of the University of Düsseldorf, financed by the Federal Ministry of Health, the e-cigarette is the most frequently used method of stopping tobacco in Germany. The e-cigarette has been proven to contribute to giving up tobacco: According to the latest research by Prof. Hajek (Queen Mary University of London), e-cigarettes have a success rate in stopping tobacco use that is twice as high as that of conventional nicotine replacement therapies. Earlier studies came to similar results. This is also reflected in practice: 54 percent of the 3.6 million British vapers are now tobacco abstainers, according to the NGO Action on Smoking and Health (ASH). In France, according to the health authority Santé publique France, 700.000 French people have stopped smoking thanks to the e-cigarette. Together, more than six million Europeans have stopped smoking thanks to e-cigarettes.⁷

Previously, a WHO institution, the International Agency for Research on Cancer, commented on vaping: „E-cigarettes have the potential to reduce the enormous burden of disease and death caused by tobacco smoking if most smokers switch to e-cigarettes and public health concerns are properly addressed.“⁸ Head of the WHO Collaborating Center for Tobacco Control at the DKFZ, Dr. Ute Mons, has also been taking a balanced position on e-cigarettes for some time now: "E-cigarettes are clearly less harmful to health than conventional cigarettes. That is the scientific consensus"⁹ and "E-cigarettes heat an e-liquid that usually contains nicotine, and the aerosol produced contains hardly any carcinogenic substances when used properly"¹⁰

Very recently, Dr. Mons (DKFZ), Prof. Kotz (University of Düsseldorf, DEBRA study), pulmonary physician and health practitioner Dr. Hering from Berlin have been campaigning for a balanced treatment of the e-cigarette. During this Prof. Kotz said: "What would be much smarter than demonising this instrument would be to educate the BzgA [Federal Bureau of health Education] about how these devices work and how they can be used".¹¹

⁶ CDC: Outbreak of Lung Injury Associated with the Use of E-Cigarette, or Vaping, Products, [cdc.gov](https://www.cdc.gov); Morisson, C.: CDC backs off recommendation, Washington Examiner, 17.01.2020, [washingtonexaminer.com](https://www.washingtonexaminer.com); mik/dpa: Nach Todesfällen in USA, Stern, 27.10.2019, [stern.de](https://www.stern.de)

⁷ Kotz, D. u.a.: The Use of Tobacco, E-Cigarettes, and Methods to Quit Smoking in Germany, Dtsch Arztebl Int 14/2018, [doi:10.3238/arztebl.2018.0235](https://doi.org/10.3238/arztebl.2018.0235); Hajek, P. u.a.: A Randomized Trial of E-Cigarettes, in: NEnglJMed 2019 380, [doi:10.1056/NEJMoa1808779](https://doi.org/10.1056/NEJMoa1808779); Brown, J./Kotz, D. u.a.: Real-world effectiveness of e-cigarettes, Addiction 9/2014, [doi:10.1111/add.12623](https://doi.org/10.1111/add.12623); Farsalinos, K. u.a.: Electronic cigarette use, Addiction 11/2016, [doi:10.1111/add.13506](https://doi.org/10.1111/add.13506); Santé publique France: Baromètre de Santé publique France 2017. Usage de la cigarette électronique, 2019, santepubliquefrance.fr; ASH: Use of e-cigarettes, Sept. 2019, ash.org.uk

⁸ International Agency for Research on Cancer: Are e-cigarettes less harmful than conventional cigarettes?, iarc.fr

⁹ Herden, B.: „Es wäre fatal, wenn Menschen zu Zigaretten zurückkehren“, Welt 07.10.2019, [welt.de](https://www.welt.de)

¹⁰ wbr/dpa: Rauchen ohne Reue, Spiegel, 25.05.2018, [spiegel.de](https://www.spiegel.de)

¹¹ Science Media Center – Press Briefing: ["Wie sollen E-Zigaretten künftig reguliert werden"](https://www.smc-stg.de/press-briefing/wie-sollen-e-zigaretten-kuenftig-reguliert-werden)

To summarize our perspective: The e-cigarette is associated with complex issues and a balanced explanation of the pros and cons is important. In our business practice, we have been noticing a visible uncertainty among consumers for some time now – not least because of the lack of balance in dealing with vaping. A non-emotionalized discussion of the subject is essential in our point of view. Because without comprehensive information, smokers will remain smokers. The tobacco products of the tobacco industry benefit most from an unbalanced approach to the e-cigarette.

As a tobacco-free association, we see the e-cigarette as a viable way to help adult smokers stop smoking. We would be happy to discuss with you the topic of e-cigarettes and their potential for health policy. We are at your disposal at any time.

With kind regards

A handwritten signature in blue ink, appearing to read 'Dustin Dahlmann', with a stylized, flowing script.

(Dustin Dahlmann, President)