



Response to Public Consultation on Disposable Vaping Devices

Summary

The [Healthy Trinity: Tobacco Group](#), acting within Trinity Sustainability, would like to see the government place a complete ban on the manufacture, sale, and distribution of disposable vaping devices. Doing so would support healthy people and a healthy planet.

This call for a complete ban on disposable vaping devices is informed by the Healthy Trinity: Tobacco group's survey of Trinity students and staff (n=2613) conducted in April 2023 that assessed prevalence and attitudes to e-cigarette use. It found that with current vaping of 32%, Trinity has double or triple the e-cigarette use of young people as measured by Healthy Ireland in 2022 (11%) and by Planet Youth in 2018 (14%). Despite this worryingly high prevalence of vaping, 53% of undergraduates, 63% of postgraduates and 73% of staff support restrictions to vaping on campus. Only 9% (n=199) responded that disposable vapes should be freely available in Ireland.

This proposal is submitted as part of the Healthy Trinity: Tobacco group's Living Lab approach to reducing addiction to nicotine. From 2016-2020 Trinity incurred a cost of approximately €150,000-€200,000 implementing a tobacco free campus policy which has achieved a 75% decrease in smoking. In academic year 2023-2024 Trinity will explore the possibility of becoming a vape free campus too. The banning of disposable vapes would greatly enhance the feasibility and affordability of Trinity becoming vape free.

In May 2023, the Australian government announced plans to completely ban disposable vapes. The Healthy Trinity: Tobacco group is grateful for the opportunity to submit to this consultation and urges the Irish government to support Australia's position by completely banning disposable vapes in Ireland.

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E-cigarette use and attitudes in Trinity

As a response to anecdotal reports of increased e-cigarette use on campus after COVID-19, in April 2023 the Healthy Trinity: Tobacco Group, worked with second year medical students, to distribute an online survey of prevalence and attitudes to e-cigarette use in Trinity. Trinity's tobacco and e-cigarettes policy (2018) prohibits e-cigarette use indoors but permits it outdoors.

Ethical approval was obtained from the School of Medicine Research Ethics Committee and the survey was circulated to all Trinity students and staff via Secretary's Office. Data were analysed in Qualtrics and Excel. 2,613 responses were received, representing a response rate of 12%. 59% (n=1539) had tried e-cigarettes in their lifetime.

In 2021, Bowe et al. analysed Planet Youth data to examine vaping amongst 15-16 year olds in the west of Ireland. They defined a current e-cigarette user as someone who had vaped in the previous 30 days. Trinity used the same definition. 32% (n=838) of Trinity respondents were current vapers, compared to 14% in the west of Ireland and 11% in the general population of 18-25-year-olds. 1,933 expressed an opinion on extending Tobacco Free Trinity so that vaping is also restricted on campus. Amongst undergraduates (n=1343) 66% supported restricting vaping on campus, amongst postgraduates (n=297) 75% supported restrictions and amongst staff (n=283) 82%

Background - Tobacco Free Trinity

Trinity is a leader in tobacco control in university campuses. In 2016 after a yearlong consultation on Trinity becoming a tobacco free campus, the Board of Trinity College Dublin gave permission for the Tobacco Policy Committee to restrict outdoor tobacco use on Trinity's College Green Campus. The Committee conducted action research which comprised student-collected data on observed smoking on campus to evaluate adherence and compliance, first to a smoke-free zones policy (June 2016–March 2018), and then to a smoke-free campus policy (March 2019–February 2020) (Mullin et al, 2023).

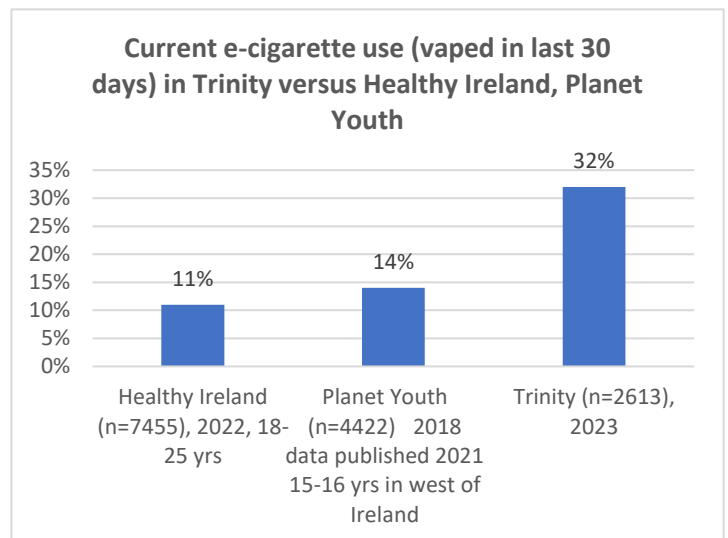


Figure 1: Vaping is twice or three times more prevalent in Trinity than in other Irish populations, where data are available

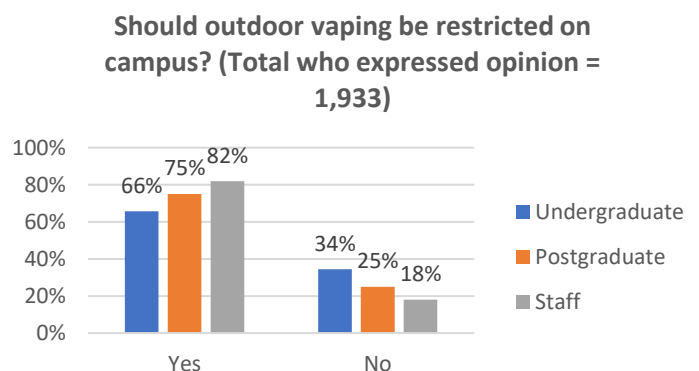


Figure 2: Amongst those who expressed an opinion, there was strong support for restricting outdoor vaping on campus

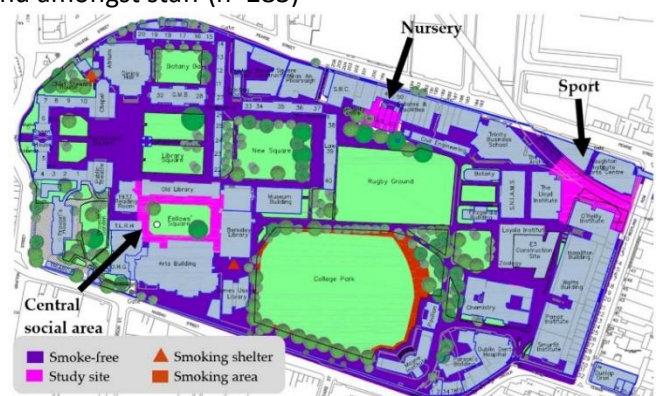


Fig. 3: A living lab approach to implementing tobacco free Trinity on the College Green campus was documented in [this paper](#), published in 2023.

From June 2016–February 2020, 2,909 smokers were observed. Adherence, defined as the average reduction in number of observed smokers from baseline in May 2016, reduced by 79% from 5.7 to 4.9. Compliance, defined as the proportion of smokers who complied when reminded of the policy, was 90% (2610/2909).

Also in 2016, Board accepted a Tobacco Policy Group recommendation to establish Healthy Trinity (Trinity College Dublin, 2016), a whole-university health promotion initiative focused on students, staff alumni and friends. The Tobacco Policy Group, professionals staff and academic partners, worked with the Faculty of Health Science to establish the Healthy Trinity initiative. It has over 100 partners across Trinity, in nine autonomous working groups co-led by academic and operational partners.

In 2021, the HEA introduced the Healthy Campus Charter and Framework. Provost Linda Doyle signed the charter, with Healthy Trinity as Trinity's implementation of Healthy Campus.

In 2023, the Tobacco Policy Committee published a Living Lab paper, that documented the process described above as well as other Living Lab developments, for example the identification of a pattern of 'social smoking' not previously documented in literature (Murray et al., 2021) and the resonance with students of the environmental harms of tobacco (Healthy Trinity Dublin, 2021).

After years of actions to control tobacco on campus, it is concerning and frustrating to see the rise of disposable vaping in Trinity given the harms disposable vapes cause to the planet and people.

Healthy Planet

E-cigarettes are a rising environmental threat and should be considered by regulatory agencies not only in terms of human health effects of vaping products, but also in terms of environmental impact (Pourchez et al, 2022). E-cigarettes produce waste in the form of disposable devices, e-liquid containers, packaging and batteries. That waste can be generalised as:

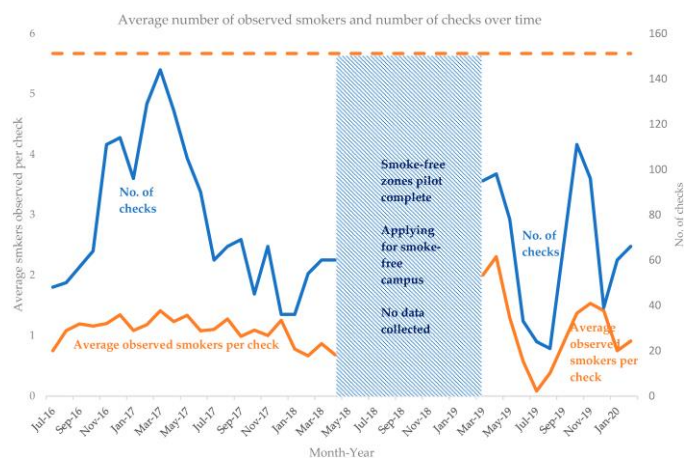


Fig. 4. Tobacco Free Trinity's Living Lab approach affected a 75% reduction in observed smoking from 2016-2020.

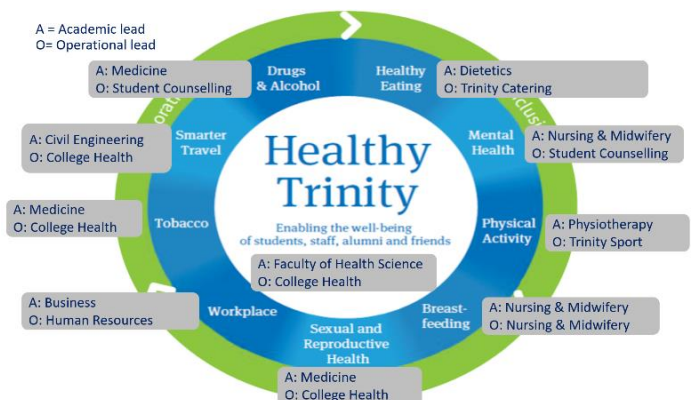


Fig. 5. Healthy Trinity was established in 2016 at the recommendation of Board, after completion of the tobacco-free Trinity consultation. It is Trinity's implementation of Healthy Ireland. The process of developing Healthy Trinity was [published in this paper](#).

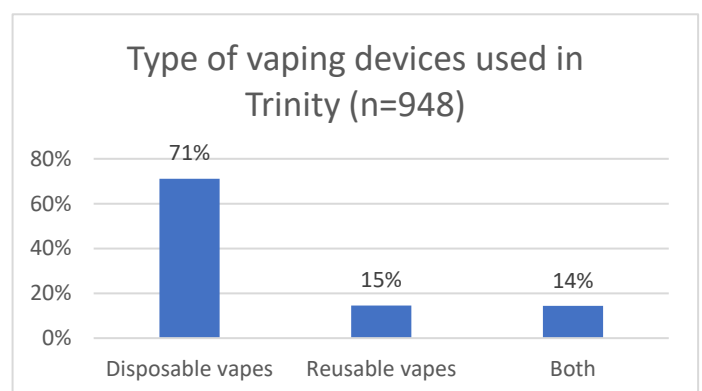


Figure 6: Amongst those who vape in Trinity, 85% use disposable vapes

- Plastic: single use plastic cartridges (largely non-biodegradable or recyclable)
- Electronic: circuit boards, lithium-ion batteries. Leak toxic compounds, explosion and fire risk in bins and trucks
- Hazardous chemical waste: pods and e-liquid containers contain nicotine

Disposable vapes generate the same type of waste as e-cigarettes but are designed to be used only once.

ASH UK in their annual YouGov survey (2023) surveyed 2028 11-17 year olds in April 2023 and found that 69% said the device they used most frequently was a disposable vape, up from 52% in 2022 and 7.7% in 2021.

The survey taken by the Healthy Trinity: Tobacco group in April 2023 found that amongst those who vape, 85% use disposable vapes and that undergraduates are much more likely to use disposable vapes than postgraduates and staff.

Despite the high use of disposable vapes on campus, 48% (n=1051) of undergraduates, postgraduates and staff support the government banning disposable vapes for adults; 43% support a ban for under 18s. Only 9% (n=199) support the government allowing disposable vapes to be freely available.

Healthy People

Sunday et al (2021) working as part of Ireland's Tobacco Research Institute analysed European data on vaping amongst 15-16 year olds and found that from 2015 to 2019, e-cigarette ever-use increased significantly from 23% (n=325) to 37.2% (n=723) ($p<0.001$), and e-cigarette current-use increased significantly from 10.1% (n=143) to 18.1% (n=351) ($p<0.001$). The Australian Government (Banks et al, 2022) conducted a systematic review of e-cigarettes and found substantial evidence that e-cigarette use results in dependence on e-cigarettes. Furthermore, research by WHO concluded that young people who use e-cigarettes can double their risk of using cigarettes.

A 2019 study published in the European Heart Journal, found that e-cigarette use can damage the brain, heart, blood vessels and lungs. The EU's scientific committee on health, environmental and emerging risks (SCHEER), concluded that there is moderate evidence for risks of long-term systemic effects on the cardiovascular system, adding that there is strong evidence for risks of poisoning and injuries due to burns and explosions.

Costs to Trinity of disposable vaping

If disposable vapes continue to be available, the Healthy Trinity: Tobacco group is concerned at the cost of limiting vaping on campus, if given permission to do so. From 2016-2020 Trinity incurred a cost of approximately €150,000-€200,000 implementing the Tobacco Free Trinity policy as a

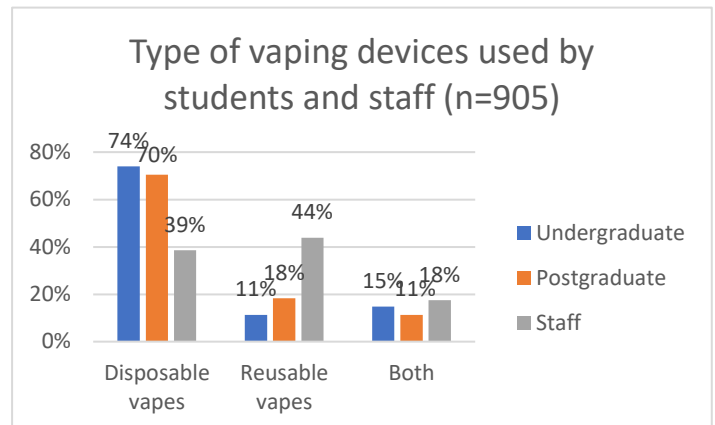


Figure 7: Undergraduate are much more likely to use disposable vapes than postgraduates or staff

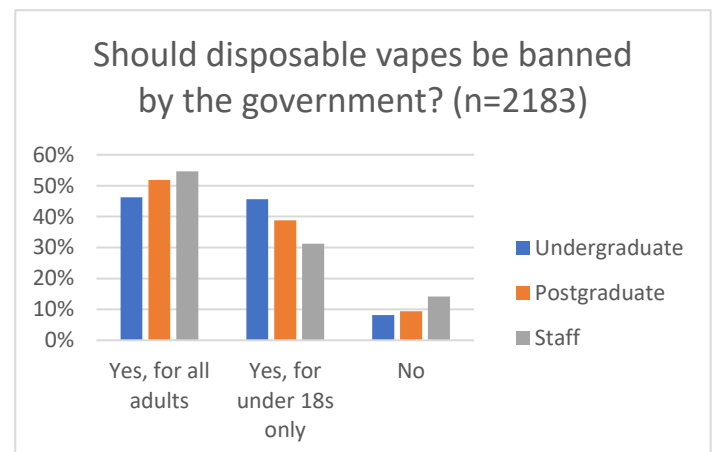


Figure 8: Only 9% (n=199) of Trinity students and staff want disposable vapes freely available.

response to Tobacco Free Ireland. Adding restrictions to disposable vapes on campus would require further funding and it is not clear where that funding would come from.

Student ambassadors currently walk Trinity's College Green campus 4-8 times per week during term and remind smokers of the tobacco free Trinity policy. The Ambassadors have raised concerns that a similar approach to limit vaping would be difficult to implement because vapes are harder to see - they can quickly be taken in and out of someone's pocket or bag. Disposable vapes would be even more difficult to identify as they are generally smaller than reusable vapes.

In academic year 2022-2023, a number of students established initiatives to recycle vapes on campus. While their efforts are laudable, it is difficult given the lack of resources in the university to find staff to support these student initiatives. Moreover, it is extremely frustrating to be asked to manage the waste of an industry that brings harm to the planet and people in pursuit of profit.

Upstream action to achieve vaping degrowth

In speaking about the biodiversity and climate crisis, the Director General of the World Health Organisation Margaret Chan said, "we have solutions, what's needed is decisive action." For the first half of the 20th century, tobacco was freely available, widely used and contributed to growth under capitalist policies. Through decades of advocacy and action from the mid 20th century onwards, tobacco control policies have achieved degrowth in tobacco consumption in Ireland to the benefit of people and the planet. Now, in a climate crisis and with growing interest in degrowth (Greens/EFA, 2023), could banning disposable vapes be another degrowth policy implemented to support a healthy planet and healthy people?

In May 2023, the Australian government announced a plan to ban recreational vaping and tighten controls on vaping (Reuters, 2023). Under Australia's new laws, e-cigarettes will be sold only in pharmacies and require "pharmaceutical-type" packaging. Disposable e-cigarettes will also be banned. The Healthy Trinity: Tobacco group would like to see Ireland ban disposable vapes as a first step in the degrowth of the vaping industry.

Contact Details

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Fig. 9: Trinity students have developed award winning projects to recycle vapes, but Trinity lacks resources to manage the external costs of vaping

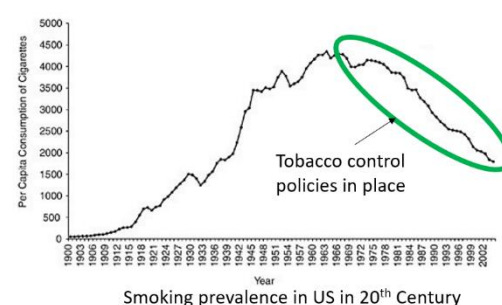


Fig. 10: Smoking prevalence in the US from 1900-2000 was reduced through upstream legislative acts that achieved degrowth

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For comments/queries please email Martina Mullin on mullinm1@tcd.ie.

References

- Amnesty International (2016) *Exposed: Child labour behind smart phone and electric car batteries*. Retrieved from <https://www.amnesty.org/en/latest/news/2016/01/child-labour-behind-smart-phone-and-electric-car-batteries/> on 15 June 2023
- Ash UK (2023) *Use of e-cigarettes (vapes) among young people in Great Britain*. July 2022. Retrieved from <https://ash.org.uk/uploads/Use-of-vapes-among-young-people-GB-2023.pdf?v=1686042690> on 19 June 2023
- Banks E, Yazidjoglou A, Brown S, Nguyen M, Martin M, Beckwith K, Daluwatta A, Campbell S, Joshy G. (2022) Electronic cigarettes and health outcomes: systematic review of global evidence. Report for the Australian Department of Health. National Centre for Epidemiology and Population Health, Canberra.
- Bowe AK, Doyle F, Stainstreet D, O'Connell EO, Durcan M, Major E, O'Donovan D, Kavanagh P (2021) E-cigarette-only and dual use among adolescents in Ireland: emerging behaviours with different risk profiles. *International Journal of Environmental Research and Public Health* **18**(1). Retrieved from www.mdpi.com DOI:10.3390/ijerph18010332 on 18/04/2023
- Darker, C.D., Mullin, M., Doyle, L., Tanner, M., McGrath, D., Doherty, L., Dreyer-Gibney, K., Barrett, E.M., Flynn, D., Murphy, P., Ivers, J., Burke, E., Ryan, M., McCarron, M., Murphy, P., Sheils, O., Hevey, D., Leen, A., Keogh, L., Walls, B., Bennett, A., Petersen, F., Nolan, A., Barry, J.M. Developing a health promoting university in Trinity College Dublin—overview and outline process evaluation, *Health Promotion International*, 2021;, daab180, <https://doi.org/10.1093/heapro/daab180>
- Dept. of the Environment, Climate and Communications (2023) Public consultation on Disposable Vaping Devices. Retrieved from <https://www.gov.ie/en/consultation/826a1-public-consultation-on-disposable-vaping-devices/> on 15 June 2023.
- Gilmore AB, Fooks G, Drope J, Aguina Bialous S, Jackson RR (2015) Exposing and addressing tobacco industry conduct in low-income and middle-income countries. *The Lancet*, Volume 385, Issue 9972, [https://doi.org/10.1016/S0140-6736\(15\)60312-9](https://doi.org/10.1016/S0140-6736(15)60312-9).
- Greens/EFA in the European Parliament (2023) Beyond Growth. Pathways towards sustainable prosperity in the EU. <https://www.beyond-growth-2023.eu/>
- Health Service Executive (2022) *Vaping (using e-cigarettes)*. Retrieved from <https://www2.hse.ie/living-well/quit-smoking/vaping/> on 22 May 2023.
- Healthy Ireland (2022) *Healthy Ireland Survey 2022 Summary Report*. Health Service Executive, Dublin. Retrieved from <https://assets.gov.ie/241111/e31b2aaa-a8d7-411d-8b62-02cca079c741.pdf> on 18/04/2023
- Healthy Trinity Dublin (2021) *Tobacco, Health and the Environment*. Trinity College Dublin: Dublin, Ireland, Available online: https://www.instagram.com/p/CNXL86_ANS7/ (accessed on 11 May 2021).
- Irish Cancer Society (ICS), Irish Heart Foundation (IHF) (2019) E-cigarettes and Heated Tobacco Products: An evidence review. Retrieved from <https://www.cancer.ie/sites/default/files/2020-01/Position%20paper%20on%20e-cigarettes%20and%20HTP%20ICS%20and%20IHF.pdf> on 22nd May 2023

Irish Universities Alliance (IUA) (2023) *Campus Living Labs Sustainability Project*. Retrieved from <https://www.iua.ie/ourwork/sustainability/campus-living-labs-sustainability/> on the 13th June 2023

June, S. (2019) E-cigarettes damage the heart, brain and lungs. Irish Heart Foundation. Retrieved from <https://irishheart.ie/news/new-study-shows-e-cigarettes-damage-the-heart-brain-and-lungs/> on 21 July 2023

Murray, S.R.; Lyne, S.J.; Cryan, M.D.; Mullin, M.; McGrath, D.; Hayes, C.B. (2021) Not really a smoker? A study on the prevalence of and attitudes to occasional social smoking in a third level institution in Ireland. *Ir. J. Med. Sci.* 190, 941–948.

Mullin M, Allwright S, McGrath D, Hayes CB. Use of a Living Lab Approach to Implement a Smoke-Free Campus Policy. *International Journal of Environmental Research and Public Health*. 2023; 20(7):5354. <https://doi.org/10.3390/ijerph20075354>

Pourchez J, Mercier C, Forest V. From smoking to vaping: a new environmental threat? *Lancet Respir Med*. 2022 Jul;10(7):e63-e64. doi: 10.1016/S2213-2600(22)00187-4. Epub 2022 May 23. PMID: 35617988.

Ramamurthi et al (2022) Marketing of “Tobacco-Free” and “Synthetic Nicotine” Products. Stanford University. Retrieved from <https://tobacco-img.stanford.edu/wp-content/uploads/2022/03/13161808/Synthetic-Nicotine-White-Paper-3-8-2022F.pdf> on 22nd May 2023

Reuters (2023) Australia to ban recreational vaping in e-cigarette crackdown. *NBC News Australia*. Retrieved from <https://www.nbcnews.com/news/world/australia-ban-recreational-vaping-e-cigarette-crackdown-rcna82379> on 21st July 2021

Sunday S, Hanafin J, Clancy L. (2021) Increased smoking and e-cigarette use among Irish teenagers: a new threat to Tobacco Free Ireland 2025. *ERJ Open Res* 2021; 7: 00438-2021 [DOI: 10.1183/23120541.00438-2021]

Trinity College Dublin (2014) Tobacco Free Trinity Consultation Document 2013-2014. Downloaded on 3rd September 2014 from <https://www.tcd.ie/collegehealth/assets/documents/Smoking/TFT%20Consultation%20Report%20Final.pdf>

Trinity College Dublin (2016) Minutes of Board Meeting 23 March 2016. Downloaded on 12th September 2016 from https://www.tcd.ie/committeepapers/board/download/UniversityBoard_minutes_20160323.pdf