

Head Office

Sane Guruji Premises, Block No. 6, 1st Floor, 386, Veer Savarkar Marg, Opp. Siddhivinayak Temple,
Prabhadevi. Mumbai – 400 025. India. Phone : 91-22-43434545. Email: ho@ida.org.in, Website: www.ida.org.in

Committed to Dental Excellence

Date: 14th March 2019

To,
Shri Narendra Modi ji
Honourable Prime Minister of India
New Delhi

cc – Shri JP Nadda ji, Honorable Health Minister of India, New Delhi

Subject: Ban of Electronic Nicotine Delivery Devices (ENDS) in India

Respected Sir,

We are deeply respectful of your government's commitment to universal healthcare for citizens of India and the many bold steps you have taken. One of these was the Advisory (F. No. P-16012/19/2017-TC dated 28th August 2018) issued by the Ministry of Health & Family Welfare (MoHFW) to the States and Union Territories to "*.. prevent the initiation of ENDS by non-smokers and youth with special attention to vulnerable groups, to ensure that any Electronic Nicotine Delivery Systems (ENDS) including e-Cigarettes, Heat-Not-Burn devices, Vape, e-Sheesha, e-Nicotine Flavoured Hookah and the like devices that enable nicotine delivery are not sold (including online sale), manufactured, distributed, traded, imported and advertised in their jurisdictions, except for the purpose and in the manner and to the extent, as may be approved under the Drugs and Cosmetics Act, 1940 and Rules made there under*". This was an excellent move showing great foresight as ENDS products have been gaining alarming popularity globally and among the youth in India.

We are thus distressed to note that more than 30 organizations¹ and industry bodies, including FICCI, CII and Cellular Operators Associations of India and others have written to the Electronics and IT Ministry opposing the proposed ban of online content related to the ENDS. These are respectable trade and industry bodies, however, this is a matter of public health and the Government should be viewing this issue only through the prism of public health.

The **Indian Dental Association (IDA)** is the largest recognized body of dental professionals in India. Its goal is to attain optimal oral health for the people in the country. Tobacco use, in whatever form, has been a major obstacle to attainment of its goal. Hence, IDA has been campaigning for a total ban on tobacco use in whatever form to improve the national health index and quality of life.

It has also come to our notice that the ENDS makers are strongly lobbying to over-turn the MoHFW Advisory and various forum are being used for this – media, legal action and even Parliament. We would like to emphatically refute the claims ENDS makers are making, as follows:

- **ENDS are a harm-reduction strategy:** There has been no evidence to show that these are less harmful and terminologies such as 'harm reduction', 'less harmful' are ways of marketing and advertising the products purely for profit business.
 - The US Surgeon General's 2016 report² on E-cigarette (ENDS) clearly shows that these possess dangers to youth, pregnant women and fetuses. Use of products containing nicotine in any form among youth, including e-cigs is **unsafe**. Centers for Disease Control (CDC) also clearly states that e-cigarettes is unsafe for kids, teens and young adults.

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- In a 2016 report produced by the World Health Organization (WHO)³ for the Conference of the Parties to the WHO Framework Convention on Tobacco Control, found "there is not enough research to quantify the relative risk of ENDS over combustible products".
- **Effective way of curbing addiction:** the claim that ENDS help people quit cigarettes is also incorrect. Many studies have shown that while smokers believe ENDS help in quitting cigarettes, 6-12 months later over 90% are still using regular cigarettes.^{4,5}

In reality ENDS products are creating an additional market for nicotine-based products and sustaining the existing markets.

The situation in the USA is alarming. As per FDA reports⁶ E-cigarette use, from 2017 to 2018, increased 78 percent among high school students and 48 percent among middle school students. In the USA traditional smoking has been falling for years among teens. That trend continues as, according to the CDC⁷, high school smoking fell from 15.8% to 7.6% between 2011 and 2017. However, ENDS popularity among teens has outstripped the reductions in traditional cigarettes as e-cigarette usage has risen from 1.5% to 11.7% over the same period. Thus ENDS significantly offset the progress made in the fight against teen smoking, especially because these teens will also take up regular cigarettes over time.

In conclusion, we would like to categorically state that the steps taken by your Government to ban ENDS products in India are in the interest of public health and all attempts by ENDS makers to overturn them must be thwarted.

Sincerely,
For Indian Dental Association
Head Office

Dr. Ashok Dhoble
Hon. Secretary General



References:

1. <https://timesofindia.indiatimes.com/business/india-business/over-30-organisations-industry-bodies-oppose-proposal-to-ban-vape-content/articleshow/68205926.cms>
2. https://www.cdc.gov/tobacco/data_statistics/sgr/e-cigarettes/pdfs/2016_sgr_entire_report_508.pdf
3. World Health Organization 2016 report - https://www.who.int/fctc/cop/cop7/FCTC_COP_7_11_EN.pdf
4. Adkison, S.E., O'Connor, R.J., Bansal-Travers, M., et al. Electronic nicotine delivery systems: international tobacco control four-country survey. Am J Prev Med. 2013;44(3):207-215.
5. Grana, R.A., Popova, L., Ling, P.M. A Longitudinal Analysis of Electronic Cigarette Use and Smoking Cessation. *JAMA Internal Medicine*, published online March 24, 2014.
6. <https://www.fda.gov/TobaccoProducts/PublicHealthEducation/ProtectingKidsfromTobacco/ucm625887.htm>
7. <https://www.forbes.com/sites/jordanwaldrep/2018/11/06/why-the-maker-of-marlboro-cigarettes-just-quit-part-of-the-vape-market/#330f66674d8b>