



Joint ACMS-ACCS #25
Therapeutic Goods Administration
Medicines.scheduling@health.gov.au

Dear Committee Secretariat,

The Public Health Association of Australia (PHAA) is recognised as the principal non-government organisation for public health in Australia working to promote the health and well-being of all Australians. It is the pre-eminent voice for the public's health in Australia, and seeks to drive better health outcomes through increased knowledge, better access and equity, evidence informed policy and effective population-based practice in public health.

PHAA welcomes the opportunity to provide input to the [proposed amendments to nicotine](#). Specifically, we wish to provide support for the proposal to amend Appendix D, Item 5 regarding nicotine when included in Schedule 4. This amendment is to ensure that possession of Schedule 4 products containing nicotine must be in accordance with a legal prescription.

PHAA strongly supports the precautionary approach to the use, promotion and availability of e-cigarettes in Australia, with proper examination by the Therapeutic Goods Administration of all health claims made about e-cigarettes and similar products. The requirement of a legal prescription for nicotine-containing e-cigarette liquids is consistent with this position. The current proposal to remove any ambiguity about this requirement is supported.

The use of e-cigarettes risks uptake by non-smokers, gateway effects, dangers associated with dual use, discouragement from smoking cessation, renormalising smoking, and allowing the tobacco industry to influence decision-making in public health. As the evidence regarding e-cigarette use grows, the concerns about these risks grows with it. The latest available data internationally supports the notion that these risks are real and significant, and that e-cigarettes are not the quit-product they are claimed to be, but another mechanism by which the tobacco industry attempts to grow its market and avoid successful public health tobacco control measures.¹

PHAA appreciates the opportunity to comment on this proposal. If you would like any further information, please do not hesitate to contact me.

Yours Sincerely,



Terry Slevin
Chief Executive Officer
Public Health Association of Australia

15 May 2020

¹ Greenhalgh, EM & Scollo, MM. InDepth 18B: Electronic cigarettes (e-cigarettes). In Scollo, MM and Winstanley, MH [editors]. Tobacco in Australia: Facts and issues. Melbourne: Cancer Council Victoria; 2020. Available from <http://www.tobaccoinaustralia.org.au/chapter-18-harm-reduction/indepth-18b-e-cigarettes>