



MASSACHUSETTS
GENERAL HOSPITAL



HARVARD
MEDICAL SCHOOL

*Massachusetts General Hospital
Department of Medicine, Division of General Internal Medicine
100 Cambridge St., Suite 1600, Boston MA 02114
Email: nrigotti@partners.org | Tel: 617-724-3548*

*Professor of Medicine, Harvard Medical School
Associate Chief, Division of General Internal Medicine
Director, Tobacco Research and Treatment Center
Massachusetts General Hospital*

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Senate Standing Committee on Community Affairs,
Parliament of Australia

To the Committee members:

I am a Professor of Medicine at Harvard Medical School based at Massachusetts General Hospital in Boston, MA, USA, where I am a primary care physician, researcher, Associate Chief of the Division of General Internal Medicine and Founding Director of the MGH Tobacco Research and Treatment Center. I am internationally known as an expert on tobacco treatment and served as President of two international professional organizations, the Society of General Internal Medicine and the Society for Research in Nicotine and Tobacco. Throughout my career I have advocated for improving the delivery of tobacco dependence treatment to reduce the enormous toll of tobacco-related disease in the US and worldwide. Since 2017, I have evaluated the benefits and risks of electronic cigarettes. I was a member of the National Academies of Sciences, Engineering, and Medicine Committee that produced the landmark 2018 Report, *Public Health Consequences of E-Cigarettes*. I have studied the effectiveness of e-cigarettes on smoking cessation and co-authored the Cochrane Collaboration Systematic Review on this topic. I am appointed to the Tobacco Policy Scientific Advisory Committee for the U.S. Food and Drug Administration's Center for Tobacco Products and also serve on Health Canada's Tobacco Control Board's Scientific Advisory Board for Vaping Products.

I am writing to submit comments to the Australian Senate Inquiry on the [Therapeutic Goods and Other Legislation Amendment \(Vaping Reforms\) Bill 2024](#). I am pleased that the government is considering a change in Australia's policies regarding the regulation and availability of electronic cigarettes. There is substantial evidence that the current Australian regulatory model of limiting these devices to difficult-to-obtain prescription products has failed. Smoking prevalence has stopped declining in Australia while smoking prevalence in other countries such as the US and UK, which allow e-cigarettes sales on consumer markets, smoking prevalence has declined dramatically.

As a primary care physician caring for adults, my goal is to reduce the toll of tobacco-related disease, the leading preventable cause of death worldwide. The potential benefit of electronic cigarettes is to reduce the enormous burden of diseases and death caused by combustible tobacco products. Evidence-based tobacco cessation products and behavioural support programs are available in Australia and the US, but a substantial proportion of adults who use them repeatedly try and fail to become tobacco-free. These individuals need other options that can reduce their combustible tobacco use and reduce their health risks from smoking. E-cigarettes are products that have that potential benefit for the Australian population. Unfortunately, current regulatory policies are failing to allow this to occur, and the current proposed alternations in the Vaping Reforms bill are not likely to improve the situation.

We now have strong evidence from the January 2024 update of the highly respected Cochrane Collaboration's systematic review and meta-analysis that e-cigarettes are more effective than nicotine replacement products or behavioural support programs for individuals seeking to quit smoking.¹ There is also substantial evidence that individuals who switch to these products instead of continuing to smoke cigarettes reduce their exposure to tobacco toxins, improve respiratory symptoms, and are very likely to have a lower incidence of cancer, cardiovascular, and chronic pulmonary disease if they switch to e-cigarettes.^{2,3} The scientific evidence is clear. In a recent article published in the *N Engl J Med*, I concluded that, "The evidence has brought e-cigarettes to a tipping point. The burden of tobacco-related disease is too big for potential solutions like e-cigarettes to be ignored."⁴ I concluded that the evidence is sufficiently strong that "US public health and professional medical societies should reconsider their cautious positions on e-cigarettes for smoking cessation."⁴ I submit that this statement applies equally to Australian public health agencies, government regulators, and medical societies.

In Australia, the debate about e-cigarettes has not prioritized the products' benefit to adult smokers, focusing instead on youth vaping and concerns about the black market. However, there is little evidence that e-cigarette use by youths is leading to increases in cigarette smoking and indeed evidence in the US that adolescent smoking rates have reached historic lows during the period when e-cigarettes have been available. Furthermore, while e-cigarette experimentation does not increase tobacco use among youths, it can lead to nicotine addiction, for which appropriate regulations are needed. However concern about youth vaping needs to be matched by government and public health agencies attention to adults who smoke and could benefit from appropriately regulated access to e-cigarettes. The benefit to be gained from the adoption of e-cigarettes by adult Australian smokers who would otherwise continue to smoke tobacco is far too large for these products to be ignored. Australia's underlying prescription-only regulatory model for e-cigarettes has failed to make them readily available to smokers whose lives could be saved. Australia should consider switching to a risk-proportionate, adult consumer regulatory model, as other Western countries have done.

Sincerely,

Nancy A. Rigotti, MD

¹ Lindson N, Butler AR, McRobbie H, et al. Electronic cigarettes for smoking cessation. Cochrane Database of Systematic Reviews 2024, Issue 1. Art. No.: CD010216. DOI: 10.1002/14651858.CD010216.pub8. (Published online January 9, 2024)

² Stratton K, Kwan LY, Eaton DL, eds. *Public Health Consequences of E-Cigarettes*. National Academies of Sciences, Engineering and Medicine, Board on Population Health and Public Health Practice, Health and Medicine Division. Washington, DC: The National Academies Press, 2018.

³ Warner K, Benowitz NL, McNeill A, Rigotti NA. Nicotine e-cigarettes for smoking cessation [invited commentary] *Nature Medicine*. 2023 (published online 13 February 2023)

⁴ Rigotti NA. Electronic cigarettes for smoking cessation: Have we reached a tipping point? *NEJM* 2024;390(7):664-665. <https://doi.org/10.1056/NEJMe2314977>