

Consultation on tobacco and vapes: packaging, appearance and display

About you

Questions for everyone

In what capacity are you responding to this survey?

On behalf of an organisation

Do you have any direct or indirect links to, or receive funding from, the tobacco industry?

No

Questions for people sharing their professional views and those responding on behalf of an organisation

What is the main area or focus of your work? (Optional)

Advocacy

Do you work for, or are you providing views on behalf of, any of the following? Select all that apply.

- Manufacturer or producer of a tobacco product
- Manufacturer or producer of a vape or nicotine product
- Importer of a tobacco product
- Importer of a vape or nicotine product
- Distributor of a tobacco product
- Distributor of a vape or nicotine product
- Retailer of a tobacco product

- Retailer of a vape or nicotine product

Or:

- None of the above

Tobacco packaging

Proposals for further plain packaging requirements

We propose to introduce plain packaging requirements for:

- all tobacco products (including but not limited to cigars, cigarillos, pipe tobacco, waterpipe tobacco, smokeless and heated tobacco)
- heated tobacco devices
- herbal smoking products
- cigarette papers

These requirements would broadly align with existing requirements for cigarettes and hand-rolling tobacco.

An overview of the existing requirements for cigarettes and hand-rolling tobacco is set out below.

Colour

Pantone 448C (drab dark brown) colour with a matt finish.

Branding

Brand name permitted once each on front, top and bottom of pack. It must:

- be in a centred position
- be in Pantone Cool Gray 2 C
- be in Helvetica font size 14 point or less
- have only the first letter capitalised

The variant name must follow the same requirements other than to be size 10 point or less and positioned immediately below the brand name.

No promotional images or logos, additional colours or markings are allowed.

Shape

Specified packaging shapes. For cigarettes this is cuboid only and for hand-rolling tobacco this is cuboid, cylindrical or pouch.

Packaging materials

Specified packaging materials. For cigarettes this is carton or soft material only.

Minimum size

20 pack for cigarettes, 30 grams for hand-rolling tobacco.

Some products may require specific plain packaging requirements, for example hand-rolling tobacco pouches are permitted to have a re-sealable sticker and cigarette packets have a lining. If we proceed with the policy, we will engage further on the details of the plain packaging measures for specific products.

Do you agree or disagree with our proposal to introduce the plain packaging requirements outlined above for all tobacco products? This does not include cigarettes and hand-rolling tobacco which already have strict plain packaging requirements.

Agree

Do you agree or disagree with our proposal to introduce the plain packaging requirements outlined above for heated tobacco devices?

Agree

Do you agree or disagree with our proposal to introduce the plain packaging requirements outlined above for herbal smoking products?

Agree

Do you agree or disagree with our proposal to introduce the plain packaging requirements outlined above for cigarette papers?

Agree

Please explain your answers. This could include, for example, sharing your views on which tobacco products plain packaging requirements should or

should not be introduced for, or specific elements of our proposals which you agree or disagree with.

RCPCH supports the proposal to extend plain packaging requirements to all tobacco products, heated tobacco devices, herbal smoking products and cigarette papers, agreeing that these requirements should broadly align with the existing plain packaging regulations for cigarettes and hand-rolling tobacco.

Packaging functions as an important marketing tool for tobacco-related product companies, and can increase the appeal, perceived quality and acceptability of these products, particularly among children and young people. Therefore, extending the existing plain packaging requirements across all tobacco-related products will help bring products in line with existing standards, reduce product attractiveness to new and existing users, and support the wider public health objective of preventing uptake among future generations.

We are in particular support for the application of these restrictions on products that may otherwise be seen by children and young people as novel, less harmful or more socially acceptable, including heated tobacco products and associated devices. Enforcing a consistent approach across product categories will help avoid misconceptions around the harm of products which may lead some towards uptake, and addiction.

RCPCH's position is entrenched in the need to protect children and young people from exposure to products and marketing practices that can normalise nicotine and tobacco use. Our recent systematic review found strong associations between e-cigarette use and subsequent smoking initiation, as well as evidence that product characteristics can influence susceptibility to use. Although this evidence relates primarily to vaping products, it reinforces the importance of reducing the overall appeal and visibility of nicotine and tobacco products to children and young people.

We therefore support the proposed requirements relating to standardised plain colour, branding, shape, packaging materials and minimum pack sizes. It is our view that these proposals are a proportionate and evidence-based measure that will contribute to reducing youth uptake and support the UK government's smokefree generation ambitions, helping improve child health outcomes.

Text health warnings on the packaging of heated tobacco devices and cigarette papers

We propose to introduce text health warnings on the packaging of heated tobacco devices and cigarette papers. All tobacco products and herbal smoking products already have these warnings. The wording of warnings will reflect the harms of using each product.

Do you agree or disagree with our proposal to introduce text health warnings on the packaging of heated tobacco devices?

Agree

Do you agree or disagree with our proposal to introduce text health warnings on the packaging of cigarette papers?

Agree

Please explain your answers.

RCPCH supports the proposal to introduce text health warnings on the packaging of heated tobacco devices and cigarette papers.

As previously stated, we believe any products used in connection with tobacco consumption should not be exempt from clear, consistent health messaging. Therefore, extending health warnings to heated tobacco devices and cigarette papers will support public understanding of the risks associated with tobacco use and ensure a coherent regulatory approach across tobacco-related products. These warnings should contain messaging that counters misconceptions that some products are less harmful or risk-free.

Picture health warnings on the packaging of more products and devices

All smoked tobacco products currently require picture health warnings, excluding individually wrapped cigars and cigarillos, and packs of large cigars that weigh more than 3 grams each. These products only require text warnings on their packaging.

Smokeless tobacco products, heated tobacco devices and herbal smoking products currently do not have picture health warnings.

We propose to introduce picture warnings on the packaging of:

- all tobacco products (including all cigars and cigarillos, smokeless tobacco and heated tobacco)
- heated tobacco devices
- herbal smoking products

We do not propose including picture warnings for cigarette papers due to the typically smaller size of the packaging.

Do you agree or disagree with our proposal to introduce picture health warnings on the packaging of all tobacco products? This builds on requirements that are already in place for most tobacco products.

Agree

Do you agree or disagree with our proposal to introduce picture health warnings on the packaging of heated tobacco devices?

Agree

Do you agree or disagree with our proposal to introduce picture health warnings on the packaging of herbal smoking products?

Agree

Do you agree or disagree that picture health warnings should not be required on the packaging of cigarette papers? We do not propose including picture health warnings on cigarette papers due to the small size of the packaging.

Neither agree nor disagree

Please explain your answers. This could include, for example, sharing your views on which tobacco products health warning requirements should or should not be introduced for.

We are supportive of extending picture health warnings to all tobacco products, heated tobacco devices and herbal smoking products.

These proposals will ensure health warnings are being applied consistently across products that currently fall outside existing requirements.

Consistency across the regulatory framework is vital if we are to avoid creating distinctions between products that could inadvertently influence perceptions of risk or acceptability.

We have answered "Neither agree nor disagree" to the proposal not to require picture health warnings on cigarette paper packaging. We recognise the practical challenges associated with the smaller size of these packs and understand the rationale set out by the government. While we do not object to the proposal, we would encourage consideration of whether opportunities exist to maximise the prominence of health information on these products within the constraints of packaging size.

Pack inserts in packaging for all tobacco and herbal smoking products and heated tobacco devices

Quit themed pack inserts will soon be introduced for cigarettes and hand-rolling tobacco following previous consultation. We propose to also include quit themed pack inserts in the packaging of:

- all tobacco products (including products such as such as cigars, cigarillos, pipe tobacco, waterpipe tobacco and smokeless and heated tobacco)
- heated tobacco devices
- herbal smoking products

We do not propose including pack inserts in cigarette papers due to the small size of the packaging.

Do you agree or disagree with our proposal to introduce pack inserts for all tobacco products? This does not include cigarettes and hand-rolling tobacco which we are addressing separately to this consultation.

Agree

Do you agree or disagree with our proposal to introduce pack inserts for heated tobacco devices?

Agree

Do you agree or disagree with our proposal to introduce pack inserts for herbal smoking products?

Agree

Do you agree or disagree that pack inserts should not be required in the packaging of cigarette papers? We do not propose including pack inserts for cigarette papers due to the small size of the packaging.

Neither agree nor disagree

Please explain your answers. This could include, for example, sharing comments on specific tobacco products for which you do or do not think pack inserts should apply.

RCPCH supports these proposals, with pack inserts providing an additional opportunity to communicate evidence-based information on the harms of tobacco use and the benefits of quitting, as well as signposting users to cessation support. Extending these requirements across product categories will help ensure a consistent approach and avoid gaps in the regulatory framework. We would also support the inclusion of messaging that signposts individuals like children and young people to age or circumstance appropriate cessation support services and information.

As in the previous response, we have answered "Neither agree nor disagree" to the proposal not to require pack inserts within cigarette paper packaging. We recognise the practical challenges associated with the small size of these products and understand the rationale for the government's proposed approach. Government though should continue to consider how best it can communicate health and support messaging within these constraints.

Overall, we support extending pack insert requirements across tobacco and related products as part of a comprehensive approach to reducing tobacco-related harm and supporting cessation.

Time allowed to implement new packaging requirements

If and when new requirements are introduced, manufacturers will need time to update their packaging to comply. Retailers may also need time to sell old stock that does not comply with new law.

There should be a long enough notice period before new requirements come into force. This period would start from when the details of the new requirements are made clear. We have not yet decided what is the best way to share those details, but it could be, for example, in a government response to this consultation or when regulations are presented to the relevant national Parliament.

We propose that a minimum notice period of 12 months would be enough. This would mean all products covered by our tobacco packaging proposals would need to comply with any new requirements by the end of a 12-month implementation period. However, a longer or shorter notice period may be needed, and we welcome views on this.

Do you agree or disagree with our proposed implementation period of no less than 12 months (from when the detail of any new requirements is clear)?

Agree

Heated tobacco device appearance

Restricting the colour and finish of heated tobacco devices

We propose to restrict the colour of heated tobacco devices to Pantone 448C (drab dark brown) with an opaque matt finish. Pantone 448C is the same colour as cigarette and hand-rolling tobacco packaging.

Restricting the colour of the device in this way would also prevent certain aesthetic features on the device, such as the presence of cosmetic lights.

Do you agree or disagree with our proposal to restrict the colour of heated tobacco devices to Pantone 448C (drab dark brown) with an opaque matt finish?

Agree

Do you agree or disagree that heated tobacco devices should be banned from having cosmetic lights? This will not apply to functional lights, like those that indicate charge level.

Agree

Please explain your answers. This could include, for example, sharing comments on whether restricting heated tobacco devices to an alternative colour may be more effective, or whether technical exemptions are required.

RCPCH supports the proposal to restrict heated tobacco devices to Pantone 448C with an opaque matt finish and to prohibit cosmetic lights.

The appearance of nicotine and tobacco products and associated devices has been well documented to influence their attractiveness and perceived desirability, particularly among children and young people. Restricting colours, finishes and decorative lighting features will help reduce the potential for product design to function as a form of promotion or brand differentiation.

We support the proposed approach as a proportionate measure that aligns with the broader objective of reducing the appeal and normalisation of tobacco and nicotine products. We also support the distinction between cosmetic lights and lights required for essential product functionality, such as indicating battery or charging status.

Overall, we consider these proposals an appropriate extension of existing tobacco control measures and support their implementation.

Restricting branding, imagery and artwork on heated tobacco devices

We propose to ban heated tobacco devices from having images or artwork on them, except for any image that is a regulatory requirement, such as required warnings.

We also propose to limit branding to a single brand name, which would be subject to a set font, size and colour on the device.

Do you agree or disagree with our proposal to restrict all branding, imagery and artwork on heated tobacco devices?

Agree

Please explain your answer. This could include, for example, sharing comments on which of the proposed restrictions you do or do not think should apply.

RCPCH supports the proposal to restrict branding, imagery and artwork on heated tobacco devices, including limiting branding to a single standardised brand name.

As packaging and advertising restrictions become stronger, product design itself may increasingly act as a means of marketing and product differentiation. Restricting imagery, artwork and branding on heated tobacco devices will help prevent the device itself from functioning as a promotional tool.

We support the proposed approach as a logical extension of existing restrictions on tobacco packaging and branding. Limiting opportunities for products to attract attention through their appearance is consistent with efforts to reduce the appeal and visibility of tobacco-related products, particularly to children and young people.

Restricting digital screens on heated tobacco devices

We propose that digital screens on heated tobacco devices are restricted to only display safety and status information, such as battery levels.

Do you agree or disagree that digital screens on heated tobacco devices should be restricted to only the display of safety and status information such as battery level, and be greyscale in colour (black, white and grey only)?

Agree

Please explain your answer. This could include, for example, sharing comments if you think there should be any exemptions to this proposal.

RCPCH supports the proposal to restrict digital screens on heated tobacco devices to the display of safety and status information only, and for such displays to be limited to greyscale colours.

This is a proportionate measure that will help ensure digital screens serve a purely functional purpose rather than acting as a means of promotion, product differentiation or consumer engagement. Limiting screens to essential information such as battery status is consistent with the wider objective of reducing the appeal of tobacco-related products.

We support the proposed approach and consider that broader display functions would not be compatible with efforts to minimise the attractiveness and normalisation of tobacco products, particularly among children and young people.

Stopping heated tobacco devices imitating other products

We propose to limit the potential appeal of heated tobacco devices by stopping them from looking like other products, such as drink bottles and game devices.

This proposal aligns with the restrictions we are proposing for vape devices. It will ensure that heated tobacco devices do not appear more attractive than vapes.

Do you agree or disagree that heated tobacco devices should not be permitted to mimic the design of other products and items? The objective of this proposal is to limit the appeal or attractiveness of heated tobacco devices.

Agree

Please explain your answer. This could include, for example, sharing comments if you think there should be any exemptions to this proposal.

RCPCH supports the proposal to prohibit heated tobacco devices from mimicking the design of other products or items.

Heated tobacco products resembling everyday consumer items may make them more appealing and less readily identifiable as tobacco-related

products, which could contribute to the normalisation in use of these products. These designs may also increase the appeal of these products to children and young people, or help individuals hide their use of these products in spaces where their use is prohibited, such as schools. Preventing such designs will reduce opportunities for product appearance to be used to increase attractiveness or deception.

It is vital that there is alignment between the proposed approach for heated tobacco devices and vaping devices. A consistent regulatory framework across product categories will help avoid unintended incentives for manufacturers to use product design features that appeal to children and young people.

Time allowed to implement new device requirements

If and when new requirements are introduced, manufacturers will need time to ensure their devices are compliant. Retailers may also need time to sell old stock that does not comply with new law.

There should be a long enough notice period before new requirements come into force. This period would start from when the details of the new requirements are made clear. We have not yet decided what is the best way to share those details, but it could be, for example, in a government response to this consultation or when regulations are presented to the relevant national Parliament.

We propose that a minimum notice period of 12 months would be enough. This would mean heated tobacco devices would need to comply with any new requirements by the end of a 12-month implementation period. However, a longer or shorter notice period may be needed, and we welcome views on this.

Do you agree or disagree with our proposed implementation period of no less than 12 months (from when the detail of any new requirements is clear)?

Agree

Vaping and nicotine product packaging and flavour descriptors

Definition of vaping products

Throughout this section, we refer to 'vaping products'. This includes vapes, as well as other vape components and refill containers sold separately from the device.

Restricting the colour on packaging for all vaping and nicotine products

We propose that the packaging for vaping and nicotine products should be white.

Do you agree or disagree with our proposal to restrict the colour of packaging of all vaping products to white?

Agree

Do you agree or disagree with our proposal to restrict the colour of packaging of all nicotine products to white?

Agree

Please explain your answers.

RCPCH supports the proposal to standardise the packaging of vaping and nicotine products by restricting packaging colour to white.

Packaging is an important component of product marketing that influences product appeal, a matter particularly important when considering the impact on impressionable children and young people. Standardising and simplifying the packaging across vaping and nicotine products is vital to reducing the ability of manufacturers to use colour and packaging design to attract attention, differentiate products and increase appeal.

We believe this proposal is consistent with the wider aim of ensuring that vaping and nicotine products are marketed appropriately, balancing their role as smoking cessation tools while reducing their attractiveness to children and young people. Evidence from RCPCH's recent systematic review (<https://pubmed.ncbi.nlm.nih.gov/42618068/>) found that product characteristics can influence vaping behaviour among children and young people, with flavoured products associated with greater susceptibility to use, more frequent use and higher levels of dependence. Measures that

reduce the promotional power of packaging are therefore an important part of a broader strategy to prevent youth uptake.

We recognise the rationale for using white packaging rather than the Pantone 448C colour required for tobacco products, maintaining a distinction between combustible tobacco products and vapes, which are less harmful and can play a role in supporting smoking cessation among adults. However, we would encourage careful consideration of whether the use of white packaging could inadvertently contribute to perceptions that vaping products are harmless or "healthy". While vaping is less harmful than smoking, it is not risk-free, particularly for children and young people.

Our recent systematic review identified associations between vaping among children and young people and a range of adverse outcomes, including respiratory symptoms, poorer mental health outcomes and an increased likelihood of subsequent cigarette smoking initiation. The proposed packaging requirements should therefore be accompanied by clear health messaging that reflects both the relative harms of vaping compared with smoking and the fact that these products should not be used by children and young people or non-smokers.

Restricting imagery, branding, text and other promotional features

We propose that the packaging for all vaping and nicotine products should not include imagery, and that all text on the packaging, including any branding or brand names, should be in a standard colour, font and typeface.

There should be no other promotional features on the outside or inside of packs or attached to the packaging, such as links to social media accounts or any feature that suggests a financial benefit, such as vouchers or discounts.

We recognise that there may be a case to allow packaging of vaping products to display a picture of the product contained inside (for example, a mouthpiece). We welcome views on whether any limited exemptions may be appropriate in the free text box.

Do you agree or disagree with our proposal to introduce the restrictions to imagery, branding, text and promotional features outlined above for the packaging of all vaping products?

Agree

Do you agree or disagree with our proposal to introduce the restrictions to imagery, branding, text and promotional features outlined above for the packaging of all nicotine products?

Agree

Please explain your answers. This could include, for example, your views on whether there should be any exemptions or further restrictions. You may also indicate any elements of the proposal you disagree with and why, or elements you feel could be further strengthened.

RCPCH supports the proposed restrictions on imagery, branding, text and other promotional features for the packaging of all vaping and nicotine products.

These proposals are vital to help reduce the ability of packaging to act as a form of advertising and are an important step in reducing the particular appeal of vaping products to children and young people. The packaging, branding, and visual design of these products influences their perceptions, particularly among young people, and should not be used to increase attractiveness or normalise nicotine use.

RCPCH's recent systematic review identified that product characteristics are an important driver of vaping uptake among children and young people. The review found that exposure to vaping promotion was associated with increased susceptibility to vaping and smoking initiation among children and young people, while product characteristics, including flavours, were associated with greater susceptibility to use, more frequent use and higher levels of dependence. It is therefore vital that we restrict promotional elements on packaging as a proportionate and evidence-based measure to reduce youth appeal.

We also support the proposal to prohibit promotional features both on and within packaging, given these features have the potential to extend the promotional reach of products beyond the point of sale and should not form part of packaging for products that can cause nicotine dependence.

We would, however, urge some caution regarding any exemptions that would permit images of products on packaging. While we recognise there

may be circumstances where some imaging information is required to help consumers identify either the product contained within the pack or any accessories, any exemption should be tightly defined and restricted to what is strictly necessary. These product images also must not be used to recreate branding, convey lifestyle associations or increase product appeal.

Restricting the shape, materials and safety features of packaging for all vaping and nicotine products

We propose that packaging used for vaping and nicotine products should use uniform shapes. For example, the packaging for devices or coils should use a similar shape, such as a rectangular cuboid, depending on their dimensions.

We also propose that manufacturers should not use materials that enhance a product's appeal, such as:

- glossy plastics
- holographic foils
- other tactile features, for example fuzzy or velvety materials

Do you agree or disagree with our proposal that packaging for all vaping products should have uniform shapes, and that there should be restrictions on materials and finishes that can enhance appeal?

Agree

Do you agree or disagree with our proposal that packaging for all nicotine products should have uniform shapes, and that there should be restrictions on materials and finishes that can enhance appeal?

Agree

Vapes are already required to have child-resistant and tamper-evident packaging. We propose to introduce this requirement for all vaping and nicotine products.

Do you agree or disagree with our proposal that packaging for all vaping products should be both child-resistant and tamper-evident?

Agree

Do you agree or disagree with our proposal that packaging for all nicotine products should be both child-resistant and tamper-evident?

Agree

Please explain your answers. This could include, for example, indicating any elements of the proposal that you disagree with and why, if there are elements that you feel could be further strengthened or other features that should be included.

RCPCH supports the proposed restrictions on packaging shapes, materials and finishes for vaping products. In particular, we are in total support of Government's proposal to require child-resistant and tamper-evident packaging for all vaping and nicotine products. These measures are essential to strengthen product safety and consistency across the market.

Extending child-resistant and tamper-evident packaging requirements to all vaping and nicotine products is essential. Nicotine is toxic, and is especially dangerous for younger children, and accidental exposure to e-liquids and nicotine-containing products remains a significant concern. RCPCH's recent systematic review identified a study reporting more than 1,300 reported ocular exposures involving e-liquid devices, 18% of which occurring in children under 5, with exposures resulting in irritation, burns and vision disturbances. The wider review also highlighted the risks associated with nicotine product availability and exposure in domestic settings. Child-resistant and tamper-evident packaging is an essential safeguard to reduce the risk of accidental ingestion, contact or misuse by children.

Restricting flavour descriptions on vaping and nicotine products packaging

Single lead flavour

We propose to restrict flavour descriptors on the packaging for vaping and nicotine products to a single, recognised flavour name, like apple or strawberry. This would include restricting hyphenated or combined flavour names, such as blueberry-apple.

Do you agree or disagree with our proposal to restrict flavour descriptors on the packaging of all vaping products to a single lead flavour?

Agree

Do you agree or disagree with our proposal to restrict flavour descriptors on the packaging of all nicotine products to a single lead flavour?

Agree

Concept, sensory, food and drink categories

We also propose restricting any concept or sensory words from being used to describe a flavour.

A concept name refers to any flavour name that does not directly describe a recognisable food, drink or natural flavour. Instead, the word conveys a mood, an idea, a brand or even a number or codename, rather than describing an actual flavour. This could include flavour names such as:

- 'Unicorn Dream'
- 'DC100'

A sensory name refers to a recognisable taste, smell or sensation experienced when using a vape or nicotine product, such as 'Mint Blast'.

Do you agree or disagree with our proposal that concept and sensory flavour descriptors should be restricted on the packaging of all vaping products?

Agree

Do you agree or disagree with our proposal that concept and sensory flavour descriptors should be restricted on the packaging of all nicotine products?

Agree

We also propose restricting descriptor names of certain food and drink categories that appeal to children and young people. This includes flavours like:

- confectionery and sweets (such as 'Chocolate', 'Candy' and 'Bubblegum')
- desserts and cakes (such as 'Brownie' and 'Cheesecake')
- alcohol and other drinks (such as 'Cola')

Do you agree or disagree with our proposal that confectionery, sweets, dessert and cake name descriptors should be restricted on the packaging of all vaping products?

Agree

Do you agree or disagree with our proposal that confectionery, sweets, dessert and cake name descriptors should be restricted on the packaging of all nicotine products?

Agree

Do you agree or disagree with our proposal that alcohol and drink name descriptors should be restricted on the packaging of all vaping products?

Agree

Do you agree or disagree with our proposal that alcohol and drink name descriptors should be restricted on the packaging of all nicotine products?

Agree

Please explain your answers. This could include, for example, your views on any elements of the proposal that you disagree with and why, or any flavour names that you believe should or should not be restricted. You may also wish to comment on whether there should be any differences in how these restrictions apply to vaping and nicotine products.

RCPCH supports all of the proposed restrictions on flavour descriptors for vaping and nicotine products, including limiting products to a single lead flavour descriptor and prohibiting concept names, sensory descriptors, and descriptors associated with confectionery, sweets, desserts, cakes, alcohol and other drinks.

It is our view that these proposals are an important step towards reducing the appeal of vaping products to children and young people, as flavour descriptors can function as marketing tools that increase product attractiveness.

However, we believe this is just a step, and that restricting flavour descriptors alone is unlikely to fully address the role that flavours play in youth vaping. While we support the proposed restrictions, we encourage

the government to consider further measures to restrict the flavours themselves, rather than solely the names used to describe them.

Evidence from RCPCH's recent systematic review found that flavoured e-cigarettes, particularly fruit, candy, mint and ice flavours, were associated with greater susceptibility to vaping, more frequent use, more failed quit attempts, and higher levels of nicotine dependence or distress among children and young people. The review also identified strong evidence that e-cigarette use is associated with subsequent cigarette initiation and progression to established smoking among children and young people, with product characteristics, including flavours, identified as important drivers of use.

The review also identified evidence clearly linking vaping among children and young people with adverse health outcomes. Across 28 studies, vaping was consistently associated with respiratory symptoms, including chronic cough, wheeze, and bronchitic symptoms, while some studies reported more than double the incidence of asthma among current e-cigarette users. Associations were also made between e-cigarette use in children and young people and poorer mental health outcomes, including depression, anxiety and suicidal behaviours.

Additionally, findings from Action on Smoking and Health's *Use of vapes and other novel tobacco and nicotine products among young people in Great Britain* survey reinforce these concerns. Among young people who vape, fruit flavours are by far the most commonly used flavour category, used by 61% of current youth vapers, while only 2% typically use tobacco flavours and 8% use mint or menthol flavours. Children are also substantially more likely than adults to use sweet flavours such as confectionery, dessert and soft-drink flavours (16% compared with 6% of adults). Furthermore, 42% of young people who currently vape report that taste is the single most important factor when deciding which vape product to use. The survey also found that "I like the flavours" is one of the most cited reasons for vaping among young people who have ever smoked.

These findings combined suggest that flavour appeal is not just related to the wording on packaging, but instead is central to the products themselves. For this reason, RCPCH would support consideration of a more restricted flavour framework in which only tobacco, menthol and mint flavours are permitted. This approach would maintain the availability of vaping products as a smoking cessation aid with flavours mirroring those

available in tobacco products, while reducing their attractiveness to children and young people. Notably, ASH's 2026 youth survey found that, when asked how they would respond to a restriction limiting flavours to tobacco, menthol and mint, a combined 41% of young people who vape reported that they would either reduce or stop vaping altogether. This compares with 34% who said the restriction would have no effect on their vaping behaviour and just 5% who said it would increase their vaping. These findings suggest that flavour restrictions could play an important role in reducing youth vaping while having a more limited impact on vaping behaviours overall

Overall, RCPCH supports the proposals in this section but considers them a first step. To achieve the government's objective of reducing youth vaping while preserving the role of vapes in adult smoking cessation, further action on flavours themselves should be considered.

Product information on and inside vaping and nicotine products packaging

We propose that the packaging of all vaping and nicotine products should have:

- a full list of ingredients, including flavour agents
- expiration details
- an age restriction symbol, for example a crossed-out 18 symbol
- a standardised display of nicotine strength, for example in milligrams, millilitres or as a percentage
- nicotine delivery per puff or pouch, where relevant

We also propose that relevant products should have a nicotine warning label on the front and back of the packaging. For example, this warning could say 'This product contains nicotine which is a highly addictive substance'. Packaging should also have clear instructions on appropriate waste disposal.

Where applicable, we propose that certain products have an instruction leaflet to inform users of any appropriate warnings and the adverse effects of nicotine.

Do you agree or disagree with our proposal to require the consumer information listed above on and inside the packaging of all vaping products?

Agree

Do you agree or disagree with our proposal to require the consumer information listed above on and inside the packaging of all nicotine products?

Agree

Please explain your answers. This could include, for example, sharing comments on any elements of the proposal that you disagree with and why, if there are areas that you feel could be further strengthened or areas that have been missed and should be included.

RCPCH supports the proposal to require standardised consumer information on and within the packaging of all vaping and nicotine products. As set out in our previous responses, vaping and nicotine products must be subject to clear, consistent and accurate health information requirements. The inclusion of standardised consumer information will improve understanding of product contents and risks, as well as supporting informed decision-making and reinforcing that these products are intended for adults who smoke and not for children and young people.

We support of the proposed inclusion of comprehensive ingredient information, including flavouring agents, and the standardised display of nicotine strength and nicotine delivery. The inclusion of these measures will improve transparency while supporting wider regulatory oversight. We are in particular support of the requirement for age restriction symbols and nicotine addiction warnings which should help dissuade use of these children and young

RCPCH's recent systematic review identified associations between vaping among children and young people and a range of adverse outcomes, including respiratory symptoms, poorer mental health outcomes and increased likelihood of subsequent tobacco use. In this context, ensuring that packaging and accompanying information clearly communicate the presence of nicotine and the potential risks associated with its use is an

important component of a wider strategy to reduce youth uptake and prevent nicotine addiction. We would recommend that government consider messaging specifically tailored to the impact these products may have on children and young people in the packaging of these products.

Time allowed to implement new packaging requirements

If and when new requirements are introduced, manufacturers will need time to update their packaging to be compliant. Retailers may also need time to sell old stock that does not comply with the new law.

There should be a long enough notice period before new requirements come into force. This period would start from when the details of the new requirements are made clear. We have not yet decided what is the best way to share those details, but it could be, for example, in a government response to this consultation or when regulations are presented to the relevant national Parliament.

We propose a minimum notice period of 12 months would be enough. This would mean all products in scope of our vaping and nicotine product packaging proposals would need to comply with any new regulatory requirements by the end of a 12 month implementation period. However, a longer or shorter notice period may be needed, and we welcome views on this.

Do you agree or disagree with our proposed implementation period of no less than 12 months (from when the detail of any new requirements is clear)?

Agree

Vape device appearance

Restricting the colour and finish of vapes

We propose restricting the colour of vape devices, including all visible parts, to:

- white, black or grey, with only one of those colours per device
- a matt finish

- no variation in shades or opacity

Do you agree or disagree with our proposal to limit the colour of a vaping device (including all visible parts) to white, black or grey with a matt finish?

Agree

Do you agree or disagree that vape devices should be banned from having cosmetic lights? This would not apply to functional lights, such as those that indicate charge level.

Agree

Please explain your answer. This could include, for example, sharing comments on whether you think no restrictions should apply, if you think only a subset of the proposed colours should be allowed or if you think alternative colours should be allowed. Equally, you may want to highlight technical exemptions that should be considered.

RCPCH supports the proposal to restrict vape devices to standardised colours and matt finishes as well as prohibiting cosmetic lights.

The appearance of vape devices can play an important role in product appeal, particularly among children and young people. Therefore, restricting colours, finishes and decorative lighting features will help ensure that product design is not used as a marketing tool or a means of increasing product attractiveness.

It is our view that these proposals are consistent with the wider objective of ensuring that vaping products are available as a smoking cessation aid for adults while reducing features that may appeal to children and young people. It is for this reason we are supportive of the distinction between cosmetic and functional device features, allowing lights that are necessary for safety or operation while removing those that serve a purely aesthetic purpose.

Restricting branding, imagery, and artwork on vapes

We propose that vapes are banned from having images or artwork, except for where these may be a legal requirement, such as warnings.

We also propose that branding should be limited to a single brand name, which would be subject to a set font, size and colour on the device. This aligns with the restrictions we are proposing for heated tobacco devices.

Do you agree or disagree with our proposal to restrict all branding, imagery and artwork on vapes?

Agree

Please explain your answer. This could include, for example, sharing comments on whether you think none or only some of the proposed restrictions should apply.

RCPCH supports the proposal to restrict branding, imagery and artwork on vape devices, including limiting branding to a single standardised brand name.

As restrictions on packaging and advertising are strengthened, we run the risk of the device itself becoming a means of promotion and brand differentiation. Therefore, restricting branding and visual design features will help reduce the ability of vape devices to act as marketing tools and will support wider efforts to limit their appeal to children and young people.

Restricting the digital screens on vapes

We propose that digital screens on vapes are prohibited, except for screens which display safety and status information such as battery and liquid levels.

Do you agree or disagree that digital screens on vapes should be restricted to only the display of safety and status information such as battery level, and be greyscale in colour (black, white and grey only)? This would not include lights that indicate status information, such as when the device is being recharged.

Agree

Please explain your answer. This could include, for example, sharing comments if you think there should be any exemptions to this proposal.

RCPCH supports the proposal to restrict digital screens on vape devices to the display of safety and status information in greyscale only. Limiting screens to essential functions will help ensure they serve a practical purpose rather than becoming a means of promotion, entertainment or product differentiation.

Stopping vapes imitating other products

Currently vapes can and do copy the design of other products, such as highlighter pens, refillable water bottles and game devices.

We propose to limit the potential appeal of vapes by stopping them from looking like other products.

Do you agree or disagree that vapes should not be permitted to mimic the design of other products and items? The objective of this proposal is to limit the appeal or attractiveness of vapes.

Agree

Please explain your answer. This could include, for example, sharing comments if you think there should be any exemptions to this proposal.

RCPCH strongly supports the proposal to prohibit vape devices from mimicking the appearance of other products or items.

Vapes that resemble everyday consumer products, toys, technology devices or stationery may be more appealing to children and young people and may be less readily recognised as nicotine products. They may also allow for these devices to be used illicitly in prohibited spaces. Therefore, preventing such designs will help reduce opportunities for product appearance to increase appeal, obscure the nature of the product, or obscure their use.

Time allowed to implement new device requirements

If and when new requirements are introduced, manufacturers will need time to ensure their devices are compliant. Retailers may also need time to sell old stock that does not comply with new law.

There should be a long enough notice period before new requirements come into force. This period would start from when the details of the new requirements are made clear. We have not yet decided what is the best way to share those details, but it could be, for example, in a government response to this consultation or when regulations are presented to the relevant national Parliament.

We propose that a minimum notice period of 12 months would be enough. This would mean all vapes would need to comply with any new regulatory requirements by the end of a 12 month implementation period. However, a longer or shorter notice period may be needed, and we welcome views on this.

Do you agree or disagree with our proposed implementation period of no less than 12 months (from when the detail of any new requirements is clear)?

Agree

Retail display

Requested temporary and incidental displays in England, Wales and Northern Ireland

Under existing legislation, tobacco products cannot be displayed inside or outside most shops across the UK. However, tobacco products can be shown to a customer following a request. The request must be by a person who is of the legal age of sale in England, Wales and Northern Ireland. We call this a 'requested temporary display' in this consultation.

Requested temporary displays enable informed purchasing decisions. As a result of a requested temporary display, other people nearby may also incidentally see these products. Current legislation in England, Wales and Northern Ireland also makes allowances for:

- restocking
- staff training

- pricing
- display unit maintenance

We call this 'incidental display' in this consultation.

Restricting the retail display of cigarette papers, heated and other tobacco-related devices and herbal smoking products in England, Wales and Northern Ireland

Tobacco products

We propose that the requested temporary display of all tobacco products should only be allowed from behind a sales counter, and not another location within a retail setting.

Do you agree or disagree with our proposal to introduce a legal requirement that the requested temporary display of all tobacco products must take place from behind a sales counter?

Agree

Cigarette papers, heated and other tobacco-related devices and herbal smoking products

We propose that most of the restrictions and allowances that apply to the display of tobacco products should apply to cigarette papers, heated and other tobacco-related devices and herbal smoking products too.

This includes:

- restricting the display of these products outside of all retail settings and inside the majority of retail settings
- providing allowances enabling display unit restocking, maintenance, pricing, staff training and requested temporary displays
- permitting the same maximum visible areas (1.5 square meters)

We also propose that the requested temporary display of these products should only be allowed from behind a sales counter, and not another location within a retail setting in the same way as we are proposing to make this a legal requirement for tobacco products.

Do you agree or disagree with our proposal to restrict the display of cigarette papers? This would include the requirement that their requested temporary display must take place from behind a sales counter.

Agree

Do you agree or disagree with our proposal to restrict the display of heated and other tobacco-related devices? This would include the requirement that their requested temporary display must take place from behind a sales counter.

Agree

Do you agree or disagree with our proposal to restrict the display of herbal smoking products? This would include the requirement that their requested temporary display must take place from behind a sales counter.

Agree

Please explain your answers. This could include, for example, sharing comments on why you think our proposed restrictions should or should not apply to certain types of products.

RCPCH supports all of the proposals in this section.

Placing restrictions on the display of tobacco products, cigarette papers, heated and other tobacco-related devices, and herbal smoking products will ensure there is a consistent regulatory approach across products associated with tobacco use.

These proposals are supported by evidence demonstrating the influence that product visibility and promotion can have on children and young people's attitudes and behaviours. Action on Smoking and Health's 2026 youth vaping survey found that 75% of children and young people reported seeing vape promotion, with in-store promotion representing the most common source of exposure at 55%. The survey also identified increasing awareness of vape displays in retail environments, particularly in supermarkets and convenience stores.

These findings are consistent with findings from RCPCH's recent systematic review, which found that exposure to nicotine product advertising, promotion and social media marketing was associated with increased susceptibility to vaping and smoking initiation among children and young people. The review also identified strong associations between e-cigarette use and subsequent cigarette smoking. It is therefore vital that Government pursue measures that reduce opportunities for nicotine and

tobacco products to become visible, which leads to familiarisation and normalisation.

RCPCH are therefore in support of extending display restrictions to products that are not currently covered by existing legislation. A comprehensive and consistent regulatory approach will help minimise opportunities for product displays to act as a form of promotion, reduce the normalisation of tobacco and nicotine use, and better protect children and young people from exposure to products intended for adult use.

Retail display of prices for cigarette papers, heated and other tobacco-related devices and herbal smoking products in England, Wales and Northern Ireland

Retailers can display prices for tobacco products in 3 formats:

- a single price list that can be permanently on display at each point of sale, but must be text-only and subject to size and font requirements
- a picture price list that can include product images and can only be shown in response to a request by a person who is of the legal age of sale
- small price labels that can be placed on the covered shelf or on the display unit where the product is kept, pending sale

We propose to apply the same price display principles to:

- cigarette papers
- all tobacco-related devices, including heated tobacco devices
- herbal smoking products

Do you agree or disagree with our proposal to restrict the display of prices for cigarette papers?

Agree

Do you agree or disagree with our proposal to restrict the display of prices for all tobacco-related devices including heated tobacco devices?

Agree

Do you agree or disagree with our proposal to restrict the display of prices for herbal smoking products?

Agree

Please explain your answers. This could include, for example, sharing comments on why you think our proposed restrictions should or should not apply to certain types of products.

RCPCH supports the proposal to apply existing tobacco price display restrictions to cigarette papers, as well as all tobacco-related devices including heated tobacco devices, and herbal smoking products.

These measures will deliver a consistent approach across products associated with tobacco use. The restriction of price displays to factual, standardised formats will help to ensure pricing information remains available to adult consumers without creating additional opportunities for products to be promoted at the point of sale.

Exemptions to display restrictions for tobacco products, cigarette papers, tobacco-related devices and herbal smoking products in England, Wales and Northern Ireland

Across the UK, there are exemptions that allow for tobacco products and their prices to be on display inside certain premises. These premises include:

- relevant trade premises (those that are only accessible to people that work in the tobacco trade)
- specialist tobacconists
- bulk tobacconists (including duty-free tobacco areas)

In England, Wales and Northern Ireland, we propose to maintain current exemptions for tobacco products for relevant trade premises and specialist tobacconists.

If and when additional retail display restrictions are brought in, we also propose that relevant trade premises and specialist tobacconists will continue to be allowed to display the following products, and their prices:

- cigarette papers
- heated and other tobacco-related devices
- herbal smoking products

We propose to remove the bulk tobacconist exemption for tobacco products and to not replicate it for any other products in scope of this consultation, since it presents a situation where products may be visibly accessible to the public, including children and young people.

Display exemptions for trade premises

Do you agree or disagree with our proposal to allow for the display of cigarette papers and their prices in relevant trade premises?

Agree

Do you agree or disagree with our proposal to allow for the display of tobacco-related devices, including heated tobacco devices, and their prices in relevant trade premises?

Agree

Do you agree or disagree with our proposal to allow for the display of herbal smoking products and their prices in relevant trade premises?

- Agree

Display exemptions for specialist tobacconists

Do you agree or disagree with our proposal to allow for the display of cigarette papers and their prices inside specialist tobacconists?

Disagree

Do you agree or disagree with our proposal to allow for the display of tobacco-related devices, including heated tobacco devices, and their prices inside specialist tobacconists?

Disagree

Do you agree or disagree with our proposal to allow for the display of herbal smoking products and their prices inside specialist tobacconists?

Disagree

Please explain your answers. This could include, for example, sharing comments on why you think proposed exemptions should or should not

be considered as well as any additional exemptions you think are necessary.

RCPCH supports the proposed exemptions for relevant trade premises but does not support the proposed exemptions for specialist tobacconists.

We recognise that relevant trade premises are restricted environments that are accessible only to those working within the tobacco trade. Therefore, permitting the display of tobacco products and their prices, is a proportionate exemption that is unlikely to undermine the wider public health objectives of display restrictions.

However, RCPCH does not believe the same rationale applies to specialist tobacconists. Unlike relevant trade premises, specialist tobacconists are retail environments that are accessible to the public and where children and young people may be present. Exempting these premises from display restrictions risks creating continued exposure to tobacco-related products and undermining efforts to reduce the visibility and normalisation of tobacco and nicotine use.

We are also concerned that retaining exemptions for specialist tobacconists could create a loophole within the regulatory framework. A consistent approach across retail settings is likely to be easier to understand, easier to enforce and less vulnerable to unintended exploitation. Exemptions should therefore be limited to genuinely restricted environments where public access is not permitted.

Display exemptions for bulk tobacconists

We propose to remove the bulk tobacconist exemption for tobacco products and their prices and to not replicate it for any other products in scope of this consultation. Keeping the exemption would mean children and young people may still be able to see these products.

Do you agree or disagree with our proposal to remove and not replicate this exemption for all products in scope of this consultation?

Agree

Please explain your answer. Where possible please include any information on any costs to bulk tobacconists associated with removing this exemption for tobacco products, including the number of businesses likely to be affected.

RCPCH supports the proposal to remove the bulk tobacconist exemption for tobacco products and their prices and to not replicate this exemption for any other products within scope of this consultation.

We agree that bulk tobacconist environments, including duty-free retail areas, present a significant risk of ongoing exposure to tobacco and nicotine products among the wider public, including children and young people. Unlike relevant trade premises, these settings are accessible to the public and may be frequented by families and children. As such, exemptions that permit the visible display of tobacco-related products in these environments risk undermining the public health objectives of wider display restrictions.

Children and young people should not be routinely exposed to tobacco, nicotine and smoking-related products in public spaces. Visibility contributes to the normalisation of these products and can reinforce perceptions that their use is commonplace or socially acceptable. RCPCH's recent systematic review found that exposure to nicotine product advertising and promotion was associated with increased susceptibility to vaping and smoking initiation among children and young people. The review also found strong associations between vaping and subsequent smoking initiation, highlighting the importance of measures that reduce exposure to tobacco and nicotine products wherever possible.

This is particularly relevant in high-footfall environments such as airports and international travel hubs, where large numbers of children and young people may be exposed to prominent product displays. There is no clear public health justification for allowing these products to remain visible in such settings when equivalent restrictions apply elsewhere.

RCPCH therefore supports the removal of the bulk tobacconist exemption as a logical and proportionate step towards creating a more consistent regulatory framework. Doing so will help reduce opportunities for tobacco and nicotine products to be promoted or normalised through public

display and better align all retail environments with the objective of protecting children and young people from exposure to these products.

Requested temporary and incidental display in Scotland

Tobacco products and smoking-related products can be shown to a customer following a request, we call this a requested temporary display. Requested temporary displays enable informed purchasing decisions.

As a result of a requested temporary display, other people nearby may also incidentally see these products. Current legislation in Scotland also makes allowances to enable restocking, staff training, pricing and display unit maintenance where necessary. We call this an incidental display.

Retail display of tobacco products, smoking-related products, heated tobacco devices and herbal smoking products in Scotland

Tobacco products and smoking-related products

We propose that the requested temporary display of tobacco products and smoking-related products should only be allowed from behind a sales counter, and not another location within a retail setting.

Do you agree or disagree with our proposal to introduce a legal requirement that the requested temporary display of tobacco products and smoking-related products must take place from behind a sales counter?

Agree

Heated tobacco devices and herbal smoking products

We propose to ban the retail display of heated tobacco devices and herbal smoking products in Scotland. As part of this, we propose that the existing restrictions and allowances that apply to the retail display of tobacco products and smoking-related products should apply to these products too.

This includes:

- restricting the display of products in places where they are offered for sale
- allowances for incidental displays and requested temporary displays

- permitting the same maximum visible areas (0.1 square metres)

We also propose that the requested temporary display of these products should only be allowed from behind a sales counter, and not another location within a retail setting. This is the same way as we are proposing to make this a legal requirement for tobacco products and smoking-related products.

To make it more practical for the retailers of waterpipes like shisha to comply with regulations due to their size, we are also proposing an expansion of the maximum permitted area of display as a result of a requested temporary display or incidental display for waterpipes.

Do you agree or disagree with our proposal to restrict the display of heated tobacco devices? This would include the requirement that their requested temporary display must take place from behind a sales counter.

Agree

Do you agree or disagree with our proposal to restrict the display of herbal smoking products? This would include the requirement that their requested temporary display must take place from behind a sales counter.

Agree

Do you agree or disagree that the maximum visible area of display unit permitted as a result of a requested or incidental display of herbal smoking products or heated tobacco devices in Scotland should be 0.1 square metres?

Agree

Waterpipes

We propose to expand the maximum visible area of display unit permitted as result of a requested or incidental display for waterpipes like shisha, due to their size.

If we expand the area of display, what size do you think it should be increased to?

- 0.5 square metres
- 1 square metre
- 1.5 square metres

Don't know

Smoking-related products

The current list of 'smoking-related products', as defined by the Tobacco and Primary Medical Services (Scotland) Act 2010, includes:

- cigarette papers
- cigarette tubes
- filters that do not form part of a tobacco product or smoking-related product
- apparatus for making cigarettes
- cigarette holders
- pipes for smoking tobacco products (which would include waterpipes like shisha)

Do you agree or disagree that the current list of smoking-related products reflects all tobacco-related devices used for smoking currently available to purchase?

Agree

Display of prices for heated tobacco devices and herbal smoking products in Scotland

Current regulations in Scotland restrict the display of prices for tobacco products and smoking-related products in places where tobacco products are offered for sale. Prices must be presented in a consistent format using specific fonts and can only include the:

- brand name of the product
- number of units in the package or the net weight of the product
- price of the product

For cigars, the information displayed can also include the country of origin and dimensions. For pipe tobacco, it can include the cut and type of tobacco used.

Retailers can display prices for tobacco products and smoking-related products in 3 formats:

- a single price list, which can be permanently displayed at each point of sale but must be text-only and meet size and font requirements
- a picture price list, which can include product images and can only be shown in response to a request by a customer
- small price labels, which can be placed on the covered shelf or display unit where the product is kept, pending sale

We propose to apply the same principles for the display of prices to:

- heated tobacco devices
- herbal smoking products

Do you agree or disagree with our proposal to restrict the display of prices of heated tobacco devices?

Agree

Do you agree or disagree with our proposal to restrict the display of prices for herbal smoking products?

Agree

Exemptions to display regulations for tobacco products, smoking-related products, heated tobacco devices and herbal smoking products in Scotland

In Scotland, there are exemptions that allow tobacco products, smoking-related products and their respective prices to be on display inside certain premises. These premises include:

- trade tobacconists
- specialist tobacconists
- bulk tobacconists and duty-free tobacco areas

We propose to maintain current exemptions for tobacco products and smoking-related products for relevant trade premises and specialist tobacconists. If and when additional retail display restrictions are brought in, we also propose that relevant trade premises and specialist tobacconists will continue to be allowed to display the following products, and their prices:

- heated tobacco devices

- herbal smoking products

We propose to remove the bulk tobacconist exemption for tobacco products and smoking-related products and to not replicate it for any other products in scope of this consultation, because these products may be visibly accessible to the public, including children and young people.

Display exemptions for trade premises

Do you agree or disagree with our proposal to allow for the display of heated tobacco devices and prices in relevant trade premises in Scotland?

Agree

Do you agree or disagree with our proposal to allow for the display of herbal smoking products and prices in relevant trade premises in Scotland?

Agree

Please explain your answers. If you have comments on business exemptions to our display proposals, please include them here. This could include, for example, why you think certain exemptions should or should not be considered as well as any additional exemptions you think are necessary.

RCPCH supports both proposals. We support a consistent approach across the four UK nations to the regulation of vaping, nicotine and tobacco-related products, helping to avoid unnecessary complexity and reducing the potential for regulatory gaps or loopholes.

Aligning Scottish provisions with those proposed elsewhere in the UK will support a clearer and more coherent regulatory framework, while contributing to the shared objective of reducing the visibility, appeal and normalisation of nicotine and tobacco products among children and young people.

Display exemptions for specialist tobacconists

Do you agree or disagree with our proposal to allow for the display of heated tobacco devices and prices in specialist tobacconists in Scotland?

Disagree

Do you agree or disagree with our proposal to allow for the display of herbal smoking products and prices inside specialist tobacconists in Scotland?

Disagree

Please explain your answers. This could include, for example, sharing comments on why you think proposed exemptions should or should not be considered as well as any additional exemptions you think are necessary.

RCPCH does not support the proposed exemptions for specialist tobacconists in relation to heated tobacco devices and herbal smoking products. As set out elsewhere in our response, specialist tobacconists remain publicly accessible retail environments and should therefore be subject to the same display restrictions as other retail settings. Exemptions should be limited to genuinely restricted premises, such as relevant trade premises, where children and young people are not present. A consistent approach across the UK will help minimise opportunities for public exposure to these products and avoid creating unnecessary loopholes within the regulatory framework.

Display exemptions for bulk tobacconists

Do you agree or disagree with our proposal to remove and not replicate the bulk tobacconist exemption for all products in scope of this consultation?

Agree

Definition of vaping products

Throughout this section, we refer to 'vaping products'. This includes vapes, as well as other vape components and refill containers sold separately from the device.

Restricting the display of vaping and nicotine products across the UK

We propose that the display of vaping products and nicotine products is restricted.

We propose that the same allowances for temporary and incidental displays as we have proposed for most other products within scope of this consultation are applied across the UK. This includes a temporary requested display taking place behind a sales counter. This would make the maximum visible area permitted for a requested temporary display or incidental display:

- 1.5 square metres in England, Wales and Northern Ireland
- 0.1 square metres in Scotland

We also propose that a requested temporary or incidental display of vaping or nicotine products must not result in the display of:

- tobacco products (and smoking-related products in Scotland)
- cigarette papers
- heated and other tobacco-related devices
- herbal smoking products

Do you agree or disagree with our proposal to restrict the display of vaping products? This would include the requirement that their requested temporary display must take place from behind a sales counter.

Agree

Do you agree or disagree with our proposal to restrict the display of nicotine products? This would include the requirement that their requested temporary display must take place from behind a sales counter.

Agree

Do you agree or disagree that the requested temporary or incidental display of vaping and nicotine products should not result in the display of tobacco products (and smoking-related products in Scotland), cigarette papers, heated and other tobacco devices or herbal smoking products?

Agree

Please explain your answers. This could include, for example, sharing comments on why you think our proposed restrictions should or should not apply to certain types of products.

RCPCH supports all of the proposals in this section. Restricting the display of vaping and nicotine products is an important measure to reduce their visibility and appeal to children and young people, while still allowing adult consumers to access these products where appropriate.

The proposed limits on incidental and temporary displays, and the requirement that displays of vaping and nicotine products must not result in the visibility of the suggested products, will help prevent display restrictions from being inadvertently circumvented and support a clearer separation between different product categories.

Evidence indicates that retail environments continue to be an important source of exposure to vaping products for children and young people. Action on Smoking and Health's 2026 youth vaping survey found that 75% of children and young people reported seeing vape promotion, with in-store promotion representing the most reported source of exposure. The survey also identified increasing awareness of vape displays within retail environments.

This is consistent with wider evidence on the impact of retail displays. For example, Blackwell et al. (2023) found that exposure to a higher proportion of e-cigarette retail displays increased susceptibility to smoking among children who visited retail stores more regularly, while greater visibility of vaping displays reduced perceived harm of smoking. The authors concluded that the findings support a review of the regulatory disparity between tobacco and e-cigarette point-of-sale marketing.

Overall, RCPCH supports these proposals as a proportionate and evidence-based approach that will help reduce the visibility and normalisation of nicotine products among children and young people while maintaining access for adults who use these products.

Display of prices of vaping and nicotine products across the UK

Across the UK, we propose to apply the same principles for the display of prices of tobacco products to:

- vaping products
- nicotine products

We propose that the price lists for vaping and nicotine products are permitted to also include nicotine strength and ingredients. This will help consumers make informed purchases.

We propose that separate price lists must be used for vaping and nicotine products and for tobacco products, for both permanently displayed price lists and picture prices lists, given vaping and nicotine products carry lower levels of harm than tobacco products.

Do you agree or disagree with our proposal to restrict the display of prices for vaping products, and allow for additional information on nicotine strength and ingredients?

Agree

Do you agree or disagree with our proposal to restrict the display of prices for nicotine products and allow for additional information on nicotine strength and ingredients?

Agree

Please explain your answers. This could include, for example, sharing comments on why you think our proposed restrictions should or should not apply to certain types of products.

RCPCH supports the proposal to apply existing tobacco price display principles to vaping and nicotine products, including permitting the inclusion of factual information such as nicotine strength and ingredients.

This is an acceptable regulatory approach that allows consumers to access relevant product information while ensuring price displays do not act as a form of promotion. Standardised, factual price information can help adult consumers make informed purchasing decisions without increasing the visibility or appeal of products.

We also support the proposal to require separate price lists for vaping and nicotine products and for tobacco products. While vaping products are not risk-free and should not be used by children and young people, they are understood to be less harmful than combustible tobacco and can play an important role in smoking cessation. Therefore, separate price lists will provide an appropriate way of communicating this distinction while maintaining restrictions on promotional activity.

Exemptions to display restrictions of vaping and nicotine products across the UK

Across the UK, it is permitted to display tobacco products inside premises that are only accessible to people working in the tobacco trade as long as this is not visible to the public from the outside. We propose to have this exemption to allow for relevant trade premises to display vaping products and nicotine products.

Do you agree or disagree with our proposal to allow for the display of vaping products in relevant trade premises?

Agree

Do you agree or disagree with our proposal to allow for the display of nicotine products in relevant trade premises?

Agree

Please explain your answers. If you have comments on business exemptions to our display proposals, please include them here. This could include, for example, why you think certain exemptions should or should not be considered as well as any additional exemptions you think are necessary.

RCPCH supports the proposal to allow the display of vaping and nicotine products within relevant trade premises.

Trade premises are restricted environments accessible only to those working within the trade and are not generally accessible to the public. In this context, permitting the display of vaping and nicotine products is a proportionate exemption that is unlikely to undermine the wider public health objectives of display restrictions.

As noted elsewhere in our response, exemptions should be limited to genuinely restricted settings where children and young people are not present and where displays are not visible to the wider public. Relevant trade premises meet these criteria.

Exemptions to display restrictions for vaping and nicotine products in pharmacies in England, Wales and Scotland

We welcome views on exemptions that allow a limited display of vaping and nicotine products inside community pharmacies in England, Wales

and Scotland. For example, this could include locked transparent display units. This could help people to try to quit smoking, while restricting accessibility to young people.

However, we do not propose that the same exemption applies to vape shops, since they are not clinical settings.

Do you agree or disagree that community pharmacies in England, Wales and Scotland should be permitted an exemption to allow for the limited display of vaping and nicotine products?

Agree

Please explain your answer. This could include, for example, why you think certain exemptions should or should not be considered as well as any additional exemptions you think are necessary.

RCPCH supports the proposed limited exemption for the display of vaping and nicotine products within community pharmacies.

We understand that pharmacies are healthcare settings with an established role in supporting smoking cessation and improving public health. A limited exemption, such as the use of locked and controlled display units, could support informed discussions between pharmacy staff and individuals seeking to quit smoking while maintaining appropriate safeguards to minimise product visibility and accessibility to children and young people.

We are strongly in favour of the proposal not to extend this exemption to vape shops. Unlike pharmacies, vape shops are retail environments rather than clinical settings and do not have the same public health function.

Should such an exemption be introduced, RCPCH would encourage it to be accompanied by the provision of clear, evidence-based information on smoking cessation and local cessation services. This should include information tailored to different populations, including children and young people, who may require support to stop vaping or address nicotine dependence. Pharmacy settings present an opportunity not only to support adults who smoke to quit, but also to signpost young people and families to appropriate advice and support where vaping has become established.

Time allowed to implement all new display restrictions

If and when new requirements are introduced, retailers will need time to update their shops to comply with the necessary changes.

There should be a long enough notice period before new requirements come into force. This period would start from when the details of the new requirements are made clear. We have not yet decided what is the best way to share those details, but it could be, for example, in a government response to this consultation or when regulations are presented to the relevant national Parliament.

We propose that a minimum notice period of 6 months would be enough. This would mean the display of products in scope would need to comply with any new requirements by the end of a 6-month implementation period. However, a longer or shorter notice period may be needed, and we welcome views on this.

Do you agree with our proposal that there should be a minimum of 6 months' notice (from when the detail if any new requirements is clear)?

Agree