

## Goulet, Morgan (OHHS)

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**From:** James W <ddarko.willette@gmail.com>  
**Sent:** Monday, January 13, 2020 8:58 PM  
**To:** Pullano, Paula (RIDOH)  
**Cc:** jack@reed.senate.gov  
**Subject:** Re: [EXTERNAL] : Re Vaping/flavored eliquid  
**Attachments:** image002.jpg; Document from Atty General Tom Miller on vaping

First let me state that I greatly appreciate your response. I am active in state and national politics and I know how demanding a job it must be and I want to thank you for listening to people like myself. I also hope that you will take the 5 minutes to read this lengthy email I have taken more than 1 hour to write. I implore you also to please read the document I have attached from the Iowa Attorney General, Tom Miller, about the state of youth vaping in America and the unintended consequences a flavor ban will have. Yes, tobacco use is dangerous to all Americans but there is NO tobacco in ecigarettes. They consist of 4 ingredients - vegetable glycerin, propylene glycol, food flavoring and nicotine, if desired. Simple common sense tells us that is a less harmful option than traditional cigarettes, which have more than 70 carcinogens and 500+ chemicals, in addition to the simple fact that you're breathing smoke from burning organic matter compared to a much less harmful aerosol, with one of the main ingredients (propylene glycol) being the main inactive component in asthma inhalers.

In the UK, vape shops are being installed in hospitals and the devices are sold in the healthcare section of pharmacies. It has been stated and well documented by the Royal College of Physicians that vaping is AT LEAST 95% safer than smoking tobacco cigarettes. The Royal College was also the first institution to warn the public about the dangers of tobacco cigarettes in 1962 and yet they have urged the UK govt, NHS and Public Health England to promote ecigarettes as far and widely as possible to encourage smokers to switch to vaping. Cigarettes are still the leading cause of preventable death and ecigarettes can change that, possibly saving millions of lives as they are proven in each of many studies to be much less harmful. We DO know what is in eliquid and we know enough of the effects, from dozens of studies, to know that they are vastly less harmful than traditional tobacco cigarettes.

In fact, the former head of the FDA, Scott Gottlieb said, "if we could switch every adult smoker fully to ecigarettes, it would have a substantial public health impact for America". I am absolutely behind smart and informed regulation for ecigarettes and eliquid, but these statistics you quote are alarmist and misleading. Many of these statistics come from polls that ask teenagers if they "used an ecigarette once in the last 30 days". As the attachment I included will show, less than 5% of teenagers who never smoked traditional cigarettes have used an ecigarette more than 20 days out of a month. If we base things on the current metric, that 78% increase you state likely includes many children who tried a friend's device only once in a month and never again. Also, teens almost exclusively use pod-based systems like the Juul, which have very little flavor at all and only a few flavor options. Most teens have stated they use Juul because they like the "rush" it gives them. Juul contains 59mg/ml of nicotine salts while tank based systems use freebase nicotine, which only goes up to 6mg in almost all cases. Very few eliquid companies sell freebase nicotine-based eliquid in a higher level than 6mg/ml. The tank based systems that most adults use are where all the flavors are and the Trump admin has decided to only ban pod-based flavors, which I fully support. I don't think anyone needs 60mg of nicotine, not even lifelong adult smokers, because I was able to quit after 19yrs of smoking 1+pack/day with 3mg liquid, the lowest option available next to 0mg nicotine.

The fact is that vaping is the best, and most effective option to help adults quit smoking. Traditional nicotine replacement therapy has an 8-10% success rate, while studies show that vaping has a 19%, and up to 27% success rate in helping smokers quit. Banning flavors will keep many adults from quitting cigarettes, drive current vapers back to smoking and it will also destroy thousands of jobs since the vape shops in RI make 70-80% of their profits from flavored liquids and would close down without the sales of eliquid. I am all for smart regulation, but an outright ban on flavors will do nothing but create a deadly black market that isn't regulated and won't discriminate against children who want to buy eliquid, in addition to turning thousands of law-abiding

adults like myself into criminals. There will be amateurs making their own liquid at home that could be adulterated and made in unsanitary conditions and they'll have no problem selling to 13yo kids because illicit dealers don't care about the law. 90% of adult vapers use flavors and I know that I couldn't have quit a 19 year cigarette addiction without them. My favorite flavor is a strawberry donut flavor. My best friend's 86yo grandmother quit a 68 year tobacco cigarette addiction using "fruity pebbles" flavored liquid and now she doesn't vape or smoke anymore. And I know this is anecdotal, but I have recently had an LFT (lung function test) done and my doctor said the results are the best he has ever seen my lungs to have. They are clearer, cleaner and healing from the nearly 2 decades of smoking and he urged me to continue vaping and not go back to smoking if I must use nicotine.

We know that nicotine is an addictive chemical, but in a traditional vaporizer that doesn't use nicotine salts, but freebase nicotine instead, the addictiveness of it is significantly less than in traditional tobacco cigarettes because they contain a multitude of chemicals, like ammonia, that greatly increase and potentiate the effect and addictive properties of nicotine. I think the federal age increase to 21 combined with strong age verification for online vendors, along with a ban on pod based flavors and only allowing eliquid to be sold in specialty vape shops or online will be very effective in curbing teenage use of nicotine. A ban on flavors is not the answer as prohibition does not work and will only create a deadly black market and it will turn law-abiding adults who just want to quit smoking into criminals.

Children will always emulate adults and will do things they're not supposed to. Teen tobacco use has dropped significantly, and though vaping has increased, it's certainly less harmful than teenagers smoking tobacco cigarettes. When you look at the adolescent risk behaviors, vaping sits far below both underage drinking of alcohol and texting & driving, both of which kill thousands of teens and children every year. Why ban eliquid flavors that are meant for adult harm reduction but teens can still get birthday cake & watermelon flavored vodka or fruit punch flavored 4 Lokos (very sweet, colorful and dessert flavored beverages with an alcohol content more than double that of a beer)? Underage drinking causes more than 3,000 children to die in alcohol-related accidents every year but we're not banning flavored alcohol. Vaping nicotine eliquid has never killed anyone yet it makes sense to ban eliquid flavors and not the dessert flavored alcoholic beverages that lead to thousands of deaths?

The fact is that other countries are not having these issues and the UK in particular (who pay for their citizens' health coverage, so obviously they want their public healthy because the govt foots the bill) have been promoting the use of ecigarettes everywhere. The doctors in the UK urge smokers to switch to vaping and they even offer current smokers a voucher to purchase a vaporizer to help encourage them to switch. Please, do more research and don't believe the alarmist media stories, for example, the current outbreak of illness and death caused by illicit THC cartridges diluted with vitamin E acetate. The CDC has definitively stated now that these deaths have nothing to do with nicotine based eliquid and are entirely attributed to THC carts.

In closing I would like to thank you for your time and consideration. I sincerely appreciate you taking the time to read my correspondence and all your years of excellent public service. And as I said before, I, and all the adult vapers that I know, fully support smart and informed regulation to keep nicotine out of the hands of children. But please do not ban the flavors that millions of adults rely on to help them quit tobacco cigarettes. There is no tobacco in ecigarettes and therefore they should not be lumped in with deadly tobacco products, which are proven to be significantly more dangerous and deadly than vaping. Thank you again for your time.

Sincerely,  
James Willette

On Mon, Jan 13, 2020, 10:51 AM Pullano, Paula (RIDOH) <[Paula.Pullano@health.ri.gov](mailto:Paula.Pullano@health.ri.gov)> wrote:

Dear Mr. Willette,

Thank you for your comment; it will be forwarded to our Rules Coordinator here at the RI Department of Health.



Center for Health Systems Policy and Regulation

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Learner Maximizer Achiever Input Responsibility

**From:** The White Wolf <[ddarko.willette@gmail.com](mailto:ddarko.willette@gmail.com)>

**Sent:** Saturday, January 11, 2020 10:05 PM

**To:** Pullano, Paula (RIDOH) <[Paula.Pullano@health.ri.gov](mailto:Paula.Pullano@health.ri.gov)>

**Subject:** [EXTERNAL] : Re Vaping/flavored eliquid

Hello, my name is James Willette. I am a 35yo resident of Pawtucket and a former smoker of 19 years. First I'd like to ask you to please take the 3 minutes to read this lengthy email, and I apologize for it's length but I didn't think I could make my points in less words. Thanks to vaping flavored liquids I was able to quit an awful cigarette addiction for the last 3 years. The Royal College of Physicians (the first group to warn of the dangers of cigarettes) has stated that vaping is at least 95% safer than smoking. In fact, in the UK, vape shops are being installed in hospitals and vaping equipment is sold in the healthcare sections of pharmacies.

I understand that youth vaping is a problem but I urge you and the RI health Dept to not enact a devastating flavor ban, like the one that is currently in action. I have been unable to purchase the eliquids that I use and have been struggling to not go back to smoking. Tobacco flavored liquid tastes nothing like cigarettes and more like eating a cigar. And we

are trying to get AWAY from tobacco so why would we want something that resembles it, and poorly at that? Flavored liquid is used by 90% of adult vapers and is instrumental in helping them quit.

I implore you to read the attached file which is a detailed letter from the Iowa Atty General, Tom Miller, to the Trump administration regarding vaping. There are many well sourced facts and proof that the vaping "epidemic" among youth is blown out of proportion. Less than 5% of teenagers who never smoked cigarettes vape regularly. That's hardly an epidemic. What we need is smart regulation, not prohibition.

There are thousands of jobs provided by the vape shops in RI and those jobs will be lost if a permanent flavor ban is enacted because the stores make about 70% of their profit from flavored eliquid. It would also create a black market with amateurs mixing liquid at home, in unsanitary conditions, and selling to whoever will pay. That will likely lead to tainted batches and adulterated liquids being sold to our youth, in addition to adults looking to quit. I recently saw a doctor and received an LFT (lung function test) and they stated that my lungs are in better shape than they have ever been and that is thanks to switching from smoking to vaping. As the former head of the FDA, Scott Gottlieb said, "if you could switch every adult smoker fully to ecigarettes, it would have a substantial public health impact."

I would also like to point out that the recent outbreak of deaths and illness attributed to vaping has been officially linked to THC cartridges containing vitamin E acetate by the CDC. Nicotine eliquid is not responsible for the sicknesses and deaths, that has been conclusively proven by the CDC, though the media has not been clear about it. I apologise for writing such a long email but I am very passionate about this as my good health and 3 years of not smoking is entirely thanks to vaping.

Please look over the attachment and think hard about the impact a flavor ban will have on adult smokers looking to quit, jobs that the industry creates and even teenagers looking to quit smoking. I started smoking at 14 and if vaping had been around then I'm sure I wouldn't have smoked deadly tobacco cigarettes for 1/4 of the time I did. There are over 70 carcinogens and 700 chemicals in tobacco cigarettes. Meanwhile, eliquid consists of only 4 ingredients - vegetable glycerin, propylene glycol (main ingredient in asthma inhalers), food flavoring and nicotine, if desired. It seems common sense to me that 4 ingredients and zero carcinogens being inhaled in an aerosol is clearly less harmful than inhaling burning organic matter with hundreds of chemicals and carcinogens.

I'd also like to point out that when it comes to adolescent risk behaviors, vaping lies below drinking alcohol (of which a much larger percentage of teenagers admit doing) and texting and driving. If eliquid flavors are being banned to "protect the children" then why are birthday cake and watermelon flavored vodkas or fruit punch 4 Lokos not being banned? There are over 3,000 alcohol related deaths of teenagers every year compared to zero deaths from vaping, not counting the recent, unrelated outbreak of tainted THC carts.

I thank you very much for your time and appreciate you listening to the public. Have a lovely week and I hope that vaping will continue to be available to save lives, as it is in the UK and many other countries.

