

**Proposed Kitsap Public Health District Vapor Products Ordinance  
Responsiveness Record**

Request or Comment	Discussion	KPHD Staff Recommendation
Accept opposing research: <a href="http://banzivapors.com/blogs/banzai-vapors-blog/82146947-test-results">http://banzivapors.com/blogs/banzai-vapors-blog/82146947-test-results</a>	Unsecured website, disallowed by Kitsap County IT system security—inaccessible blog; peer reviewed journal and author not referenced	Does not meet standard for research
Accept opposing research: “Press release E-cigarettes around 95% less harmful than tobacco estimates landmark review”	Press release issues by Public Health England describing an “expert independent evidence review”, and some highlights of the review, including quotations from the authors, not presented in the context of their placement in the paper. The actual report is reviewed below	Does not meet standard for research
Accept opposing research: “Propylene glycol in e-cigarettes might keep us healthy, says researchers”	Article on general public website sponsored by Azo Network, a medical marketing firm. No author listed; The writer makes multiple assertions unsupported by research related to multiple topics, and cites a 1942 article in Time Magazine about exposure to propylene glycol in mice; refers reader to <a href="http://www.eCigarettesChoice.com">www.eCigarettesChoice.com</a> , a vapor product advocacy website to learn more about trials on e-cigarettes, which could not be found.	Does not meet standard for research
Accept opposing research: “Contaminant in e-cig vapor also found in human breath and outdoor air”	Web posting on <a href="http://ecigaretterevuewed.com">ecigaretterevuewed.com</a> , a vapor product advocacy website. No author credentials or affiliation with research entity. The article expresses multiple personal opinions, and references older articles outside the body of literature on vapor products.	Does not meet standard for research
Accept opposing research: “A comparison of electronic cigarette emissions with those of human breath, outdoor air, and tobacco smoke”	Author credentials, qualifications not evident; academic/institutional affiliation not evident; conclusion appears to represent a personal response to an issue with bias evident; Sources referenced do not necessarily support the assertions of the author and many resources do not meet the definition of credible resources; not published in peer-reviewed journal; publishing website biased (“ <a href="http://ecigaretterevuewed.com">ecigaretterevuewed.com</a> ”); several references not actually reviewed per author admission	Does not meet standard for rigorous research
Accept opposing research: “Nicotine myth busted – nicotine does not cause addiction”	Personal blog post on <a href="http://ehealthforum.com">ehealthforum.com</a> , an “online health community/social network”. No credentials or affiliation with research entity. Personal biased opinion is presenting without references to the body of research.	Does not meet standard for research
Accept opposing research: “Peering through the mist: systematic review of what the chemistry of contaminants in electronic cigarettes	Author credentialed and associated with school of public health; No evidence of expertise in field of e-cigarettes or health effects of chemical exposures—specialty is occupational exposures; Cites some major	Does not meet standard for rigorous research;

tells us about health risks”	works, many obscure on non-published resources; makes multiple personal assertions about associations with health that are not supported by citations nor summarized research results; uses non-mainstream dose representation, possibly relevant to occupational exposure; Published on online “open access” journal “Biomed Central” with non-rigorous peer review; published in 2014.	conclusion does not match article title, and asserts that exposures are at levels of concern because of the lack of definitive health research
Accept opposing research: “Effects of electronic cigarette use on the elastic properties of the ascending aorta in healthy subjects: comparison with the effects of tobacco cigarettes” (Poster and slide presentations)	Author credentials, qualifications not evident; institutional affiliation listed as “Department of cardiology, Onassis cardiac surgery center”; poster format appears to indicate this was a presentation with unclear purpose; no mention of body of research, nor citations of/comparisons to other research; not published in peer-reviewed journal; published on website with evident bias ( <a href="http://www.ecigarette-research.com/EUROECHO2013-ecigs.pdf">http://www.ecigarette-research.com/EUROECHO2013-ecigs.pdf</a> ); Note, this appears to be original research with small sample size	Does not meet standard for rigorous research
Accept opposing research: “How much nicotine kills a human? Tracing back the generally accepted lethal dose to dubious self-experiments in the nineteenth century” (“Guest editorial”)	Author credentials, qualifications not evident; academic affiliation listed as University of Graz, Austria; not a recognized expert in e-cigarettes; article is an editorial, by nature an opinion piece that is not peer-reviewed; viewpoint in editorial and multiple websites reveals extreme viewpoints different from the body of research; References supporting assertion are not contemporaneous. Of note, does not make claim of definitive research; instead attempts to encourage more rigorous assessment of actual toxic doses;	Does not meet standard for rigorous research
Accept opposing research: “Evaluating nicotine levels selection and patterns of electronic cigarette use in a group of ‘vapers’ who had achieved complete substitution of smoking”	Author credentials and qualification are evident; recognized expert in substance use and e-cigarette cardiac effects; citations are credible, and body of research considered; the Libertas Academia is an open access journal that claims peer review. Of note, the author’s purpose is stated as influencing the UK’s e-cigarette policy to continue to allow the use of nicotine containing liquids long term. The recommendations are based on the accuracy in labeling requirements that exist in the UK, and are based on nicotine levels in the products and their effect on side effects and cessation. Conclusion: “...high nicotine-containing liquids are probably essential for initiating and maintaining smoking abstinence in a group of motivated vapers.”	Meets standard for rigorous research.
Accept opposing research: “E-cigarettes: an evidence update—a report commissioned by Public Health England”*	Author credentials and major institutional associations are presented; the publisher is a credible governmental agency; Many resources in the body of vapor product literature are referenced, but not all key studies; bias is difficult to discern, as there is not discussion of conflict, and key assertions contradict those in the body of	Meets standard for scholarly research

	literature, and by other scholars. There is no mention of conflict of interest or financial support. The article was not peer-reviewed. An important note: the authors advocate the use of e-cigarettes instead of tobacco toward harm reduction, and they are careful to limit the recommendation to the smoking population. They do not advocate e-cigarette smoking in any populations but adult smokers. Additionally, vapor products are heavily regulated in the UK, including stringent labeling and childproof packaging regulations, and the liquids must be registered, along with toxicological tests, to the government. Assertions do not necessarily apply to the U.S. non-regulated situation	
Accept opposing research: "Nicotine safety in the context of e-cigarette use and tobacco dependence"	Slide show presentation by expert in the field of tobacco dependence; Affiliation with University of Nottingham listed. Discloses relationship with e-cigarette manufacturer; citations are old; does not cite major scholarly works in the body of literature; not published or peer-reviewed; assertions not supported by scholarly research.	Does not meet standard for scholarly research
Accept opposing research: "Safety evaluation and risk assessment of electronic cigarettes as tobacco cigarette substitutes: a systematic review"	Credentials not presented; affiliated with Onassis Cardiac Surgery Center, Greece; not a known expert; many unscientific references, such as "demonized", indicating some bias; article purports to be a complete analysis of all articles related to the health effects of vapor products, and many obscure references are used	
Accept opposing research: "New analysis points to use of e-cigarettes as quitting aid among U.S. adults"	Press release published by Oxford University Press, referring to study called "Patterns of electronic cigarette use among adults in the United States".	Does not meet standard for scholarly research
Accept opposing research: "acute effects of using an electronic nicotine-delivery device (electronic cigarette on myocardial function: comparison with the effects of regular cigarettes"	Author's credentials and affiliation are not listed. The article on this original research is published on Biomed Central, an online "open access" web platform with questionable peer review process; author cites other major works, but very few and many old studies; the scope of the paper is appropriate, though sample size is very small; financial or other conflict of interest is not addressed.	Meets standard for scholarly research
Accept opposing research: "Effect of continuous smoking reduction and abstinence on blood pressure and heart rate in smokers switching to electronic cigarettes."	Credentials not presented; affiliated with Onassis Cardiac Surgery Center, Greece; not a known expert; published in peer-reviewed journal; this is original research with 300 subjects; the author references other major works; article is current, having been published in 2015; references are generally scientific, and some are current.	Meets standard for scholarly research: small study; demonstrated blood pressure reduction with cessation of cigarettes, even if e-cigarettes were

		used
“First e-cigarettes to be prescribed on the New Year but ministers ‘wanted to keep quiet in case GPs are overrun’	Author is a writer for an online “daily mail” service. No academic or institutional affiliation noted. Not an expert in the field; not published in a peer reviewed journal. The article just describes the author’s views of e-cigarette prescribing in England	Does not meet standard for scholarly research
“The deception of measuring formaldehyde in e-cigarette aerosol— differences between laboratory measurements and true exposure”	Article in an e-cigarette newsletter. Author’s credentials are not listed, and there is listed academic or institutional association. The article was not published in a peer reviewed journal, and represents the author’s opinion that disputes the type and high levels of formaldehyde found in e-cigarette aerosols in a recent study, describing poor aerosol generation technique not representative of true e-cigarette use	Does not meet standard for scholarly research
“Statement by Attorney General Tom Miller on Electronic Cigarette Key Facts”	The article is a press release about a statement from the Attorney General of Iowa. Author is unknown; Attorney General does not have scientific credentials nor listed association with academic institution of science; not found in a peer reviewed journal; appears to describe the Attorney General’s personal opinion about e-cigarettes.	Does not meet standard for scholarly research
“Select Committee on GRAS Substances (SCOGS) Opinion: Propylene Glycol and Propylene Glycol Monostearate”	The article is a publication of the USFDA, SCOGS Report Number 27, and addresses “generally recognized as safe food substances”. It does not address inhalation, but finds ingestion results in no demonstrable harm. Author is a government scientific agency.	Scientific validity assumed for ingestion of reviewed substances (inhalation not addressed)
“Feasibility of Electronic Nicotine Delivery Systems in Surgical Patients”	The article is an abstract of an article published in Nicotine Tobacco Research, a peer-reviewed journal; Authors’ credentials are not provided. The abstract relates a small observational study of 75 people who used e-cigarettes to cut down on (but not necessarily quit) tobacco cigarette use. There is no obvious bias. References could not be reviewed since only an abstract was provided	Probably qualifies as scientific research; demonstrates less cigarette use with e-cigarettes, but not cessation
Anti-Smoking Expert: WA DOH’s Vaping Advice is Public Health Malpractice”	The article presented is a press release by the “American Vaping Association”. It is not research and clearly reveals the opinions of the association	Does not meet standard for research
“Washington’s Health Department Slammed for Telling ‘Lies’ About E-Cigarettes”	An article of “The Daily Caller”, an e-cigarettes advocacy newsletter service. Communicates personal opinions of author; author with no credentials or academic institutional affiliation presented.	Does not meet standard for research
“New Surgeon General Should Prescribe Scientific Honesty on E-Cigarettes”	Article in Forbes online magazine. The article clearly expresses that the contributor/author is expressing her own opinion. No credentials provided, nor institutional affiliation.	Does not meet standard for research

"Stop Smoking Start Vaping"	Page appears to be a "pinkspotvapors.com" poster showing the course of smoking cessation using e-cigarettes. No author listed, no association with academic or research entity.	Does not meet standard for research
"Vaping side effect facts and fiction"	This is an article from "electroniccigaretteconsumerreviews.com". No author or scientific affiliation are noted. Many opinions expressed without references to scientific literature.	Does not meet standard for research
"The rest of the story: tobacco news analysis and commentary"	This is an article from "tobaccoanalysis.blogspot.com". No author is listed, nor is any scientific or academic affiliation. The piece expresses the opinions of the author without references to the scientific literature	Does not meet standard for research

\*Because this document was reference so many times during testimony as credible proof that use of e-cigarettes was safe and a valid smoking cessation method, a summary of this Document follows, for the convenience and understanding of the reader.

McNeill A, Brose L, Calder R, et. al. (2015) E-cigarettes: an evidence update—a report commissioned by Public Health England. PHE Publications Gateway Number: 2015260. Retrieved from: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/457102/Ecigarettes\\_an\\_evidence\\_update\\_A\\_report\\_commissioned\\_by\\_Public\\_Health\\_England\\_FINAL.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/457102/Ecigarettes_an_evidence_update_A_report_commissioned_by_Public_Health_England_FINAL.pdf)

In May, 2016, England will implement stringent regulations, called “EU Tobacco Products Directive”. Given that the U.S. does not have any product regulation, many of this article’s claims are not directly applicable to the U.S. “Much of England’s strategy of harm reduction is predicated on the availability of medicinally licensed products...” (Page 26) Under the rules, vapor products must be licensed as a medicine or registered with the authorities, including:

- Product and emissions contents must be listed
- Dose of nicotine delivered to the person using the device/substance must be listed
- There must be a declaration of safety, and of the manufacturer’s liability
- If nicotine-containing, the packages must contain only a limited volume without additives, and the ingredients must not pose a health risk
- Packaging must be tamper and child proof
- An educational pamphlet must be included, as with medicines, including information about addictiveness and toxicity
- There can be no promotional elements or features on packaging, and there must be health warnings
- Manufacturers must report annual data on sales volumes by brand and type, on the preferences of consumer groups, and on market surveys
- “Member States” are required to monitor their markets for concerning products, especially for signs e-cigarettes are acting as a gateway to nicotine addiction leading to tobacco use in youth

Top reasons noted by British youth for using e-cigarettes are experimentation/curiosity and appealing flavors. Comments on seeking harm reduction by encouraging e-cigarette use by adults to decrease or eliminate tobacco use are couched in cautions about the critical need to monitor e-cigarette uptake, and signs of progression or reversion to tobacco use, and dual use of the two. The trend seen in America, in which youth e-cigarette use is associated with interest in subsequent tobacco use was not noted in a survey of English youth, although concerns about this changing were expressed.

References to other articles note that when vapor product chemical mixtures have been studied, the claimed nicotine is often lower than that listed on the package, but “The real content exceeded markedly the labelled concentration...in samples where the declared content was very low.” The report also notes the difficulty in establishing the dose of nicotine delivered by the devices, because this can vary greatly by puff duration and frequency. This can be adjusted [by the smoker] to deliver high doses of nicotine.

Finally, the article notes that Australia has banned the sale of nicotine-containing vapor products, and Canada has prohibited the sale of vapor products that contain nicotine.