



8 September 2021

The Hon Carrie Lam
Office of the Chief Executive
Hong Kong Special Administrative Region
People's Republic of China

Dear Chief Executive Lam:

The CAPHRA Expert Advisory Group (EAG) is comprised of medical and scientific professionals and researchers from throughout the Asia Pacific region. The purpose of the group is to provide a regional expert “voice” for Tobacco Harm Reduction (THR) – to collaborate with other experts in the region as well as with consumers, public health and government officials and the wider THR community.

We recently came across media reports highlighting that Hong Kong will move forward to deliberate on a Bill which seeks to ban the importation and sales of all alternative nicotine delivery products (“**ENDS**”) such as e-cigarettes and heated tobacco products. We understand that there have been regulatory proposals tabled for the Government to consider regulating heated tobacco products instead of imposing a blanket ban for ENDS. We are writing to you to humbly offer our views on this issue.

It has long been accepted that combustion of tobacco is the primary cause of smoking-related diseases. The use of ENDS results in far lesser emission of harmful chemicals, and as such, substantially reduces the ENDS user’s exposure to carcinogens and other toxicants^{1 2}. Clinical studies indicated that such reduction in exposure can lead to improvements in several clinical risk markers such as inflammation, lung function and oxidative stress.^{3 4} Such evidence has led to a growing consensus in the international scientific community that ENDS, use of which do not involve combustion, are much less harmful than regular cigarettes. A study conducted in Japan has also found that the use of heated tobacco products, as opposed to smoking cigarettes, can reduce the risk of exposing harmful substances to bystanders.⁵

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¹ Bekki, K., et al. (2017). Comparison of Chemicals in Mainstream Smoke in Heat-not-burn Tobacco and Combustion Cigarettes. *Journal of UOEH*, 39(3), 201–207. <https://doi.org/10.7888/juoeh.39.201>

² Abrams D, et al (2018, Jan 11) Harm Minimization and Tobacco Control: Reframing Societal Views of Nicotine Use to Rapidly Save Lives. *Annual Review of Public Health*. 39:193-213. <https://doi.org/10.1146/annurev-publhealth-040617-013849>

³ McNeill A, et al (2018, May 13). Evidence review of e-cigarettes and heated tobacco products 2018. *Public Health England*.

<https://www.gov.uk/government/publications/e-cigarettes-and-heated-tobacco-products-evidence-review/evidence-review-of-e-cigarettes-and-heated-tobacco-products-2018-executive-summary>

⁴ Marszalek D, et al (2019, Sep 24) Comparison of tobacco heating products and conventional cigarette: a systematic review, *Journal of Health Policy and Outcomes research*. [0.7365/JHPOR.2019.2.3](https://doi.org/10.1016/j.jhp.2019.2.3)

⁵ Hirano T, Shobayashi T, Takei T, Wakao F. Exposure Assessment of Environmental Tobacco Aerosol from Heated Tobacco Products: Nicotine and PM Exposures under Two Limited Conditions. *Int J Environ Res Public Health*. 2020; 17(22):8536.

⁶ Hirano T, Takei T. Estimating the Carcinogenic Potency of Second-Hand Smoke and Aerosol from Cigarettes and Heated Tobacco Products. *Int J Environ Res Public Health*. 2020; 17(22):8319.



Heated tobacco products are now available in over 50 markets. Among the various countries in Asia that have regulated heated tobacco products, data from Japan has been most advance. These data provide strong indication that fears that availability of heated tobacco products could directly cause an increase in youth initiation, or the gateway effect are unfounded:

- Japan's smoking rates have declined by more than 30% since heated tobacco products were first launched in 2014. A study⁷ led by researchers from the American Cancer Society found that the introduction of heated tobacco products likely reduced cigarette sales in Japan.
- The 2019 National Health and Nutrition Survey⁸ found that that smokers were increasingly switching to exclusively use heated tobacco products and that smoking rates continue to decline.
- A government sponsored study⁹ by Tottori University, Osaka, did not find high levels of heated tobacco products usages among middle-school and high-school students.

The World Health Organisation's ("**WHO**") Framework Convention on Tobacco Control ("**FCTC**"), which China is a member of, itself defines tobacco control policies as a range of supply, demand and harm reduction strategies that aim to improve the health of a population by eliminating or reducing their consumption of tobacco products and exposure to smoke from combustible tobacco products. With the growing global evidence in support of the harm reduction potential of heated tobacco products, 48 countries have moved towards specifically regulating heated tobacco products¹⁰. In fact, a recent report¹¹ by the World Health Organisation ("**WHO**") did not make any recommendations to ban these products and specially recommended that member states should regulate heated tobacco products.

It is highly commendable that Hong Kong has set a target to reduce smoking rates from the current 10.2% to 7.8% by 2025. We strongly believe that by appropriately regulating heated tobacco products and adopting a harm reduction approach to complement Hong Kong's existing strong tobacco control policies, Hong Kong can achieve a high reduction in smoking rates and improve public health outcomes.

We hope this information is helpful for your consideration of the legislative proposal and would be delighted to have the opportunity to discuss further.

⁷ [Effect of IQOS introduction on cigarette sales: evidence of decline and replacement | Tobacco Control \(bmj.com\)](#)

⁸ [000687163.pdf \(mhlw.go.jp\)](#)

⁹ [Update of Current Status in Japan on Tobacco Harm Reduction GFN 2019](#)

¹⁰ 2021 WHO report on the Global Tobacco Epidemic

¹¹ https://untobaccocontrol.org/downloads/cop9/main-documents/FCTC_COP9_9_EN.pdf



Yours sincerely,

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