



The Association of Directors of Public Health Consultation Response

Tobacco and vapes: packaging, appearance, and display

Objectives and Scope

The [Tobacco and Vapes Act](#) includes a range of new regulation-making powers. The UK Government and the devolved Governments intend to use these new powers as soon as possible, for maximum public health benefit. This is part of a co-ordinated approach across the four nations to tackle the harms and risks of tobacco use, vaping, and nicotine products.

As part of this [consultation](#), DHSC would like our views on proposals for UK restrictions on:

- tobacco packaging
- vaping and nicotine products
- appearance of heated tobacco devices and vaping devices
- retail display of tobacco, vaping and nicotine products

A full description of the products in scope of each measure is included in this [consultation](#). This includes considering any potential impacts on:

- people and businesses
- groups of people with protected characteristics

About ADPH

ADPH is the representative body for Directors of Public Health (DsPH), and is a collaborative organisation, working in partnership with others to strengthen the voice for public health, with a heritage which dates back over 160 years. We also work closely with a range of Government departments, including [DHSC](#) and [UKHSA](#), as well as the four CMOs, NHS, devolved administrations, local authorities, and national [organisations](#) across all sectors to minimise the use of resources as well as maximise our voice.

ADPH aims to improve and protect the health of the population by:

- Representing the views of DsPH on public health policy.
- Advising on public health policy and legislation at a local, regional, national, and international level.
- Providing a support network for DsPH to share ideas and good practice.
- Identifying and providing professional development opportunities for DsPH.

If we have submitted the response in partnership with another organisation then their boiler plate would go in this paragraph, underneath ADPH's.

Overall position

ADPH welcomes the proposals in this consultation. We support a comprehensive approach to regulating the packaging, appearance, and retail display of tobacco, vaping, and nicotine products, with the overarching aim of reducing the appeal and visibility of these products, particularly to children and young people (CYP), while supporting smoking cessation and avoiding unintended consequences that could increase smoking.

When submitting our responses, we will repeat relevant information where needed to ensure each response is comprehensive and stands on its own, particularly where different people may be reviewing responses.

Tobacco packaging

Proposals for further plain packaging requirements

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
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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

- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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

- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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

- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- We agree that all tobacco products, cigarette papers, and herbal smoking products should be covered by the new legislation. These products are within the scope of age of sale legislation in England and Wales and this should continue to be reflected in the new packaging requirements.ⁱ
- Packaging remains an important means through which tobacco companies can make their products more appealing to consumers. Subtle differences in colour and branding of tobacco products can create misleading perceptions about relative harm.
- A systematic review on plain packaging demonstrated that when lighter colours are used for tobacco product packaging, the products are perceived (wrongly) as being less harmful than when darker colours are used.ⁱⁱ
- Standardised packaging is a proven method to mitigate this, and support people to quit smoking, and deter people – especially children and young adults – from starting.ⁱⁱⁱ This has been demonstrated both overseas and in the UK with the current regulations on cigarettes and hand rolling tobacco.^{iv}
- Applying standardised packaging to tobacco and tobacco related products is an important way to convey the health risks of using all tobacco related products for both smokers and non-smokers.

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

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

- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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

- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

Please explain your answers. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- We support the introduction of clear text health warnings on heated tobacco devices and cigarette papers. Including clear text health warnings under standardised packaging is an important way to convey the health risks of using all tobacco related products for both smokers and non-smokers.
- Extending these requirements will help address gaps in existing regulation and ensure that consumers have clear information about the health risks associated with these products. This is particularly important for products which may otherwise be perceived as less harmful because of their appearance or because they do not resemble conventional cigarettes.

Picture health warnings on the packaging of more products and devices

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
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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

- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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

- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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.

- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- We support extending picture health warnings to tobacco products, heated tobacco devices, and herbal smoking products.
- Picture health warnings are an established component of tobacco control and provide a direct and prominent means of communicating the health consequences of tobacco use. Extending them to additional products will help ensure consistency and reduce opportunities for products to be presented as less harmful through differences in packaging.
- We also support the proposed exemption for cigarette papers because of the practical limitations associated with the small size of the packaging.

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

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
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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

- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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

- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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.

- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- We support the introductions of positive, quit-focused pack inserts for tobacco products, heated tobacco devices, and herbal smoking products.
- Pack inserts are an important tool in supporting smokers to quit. They can reinforce the warnings on tobacco products by providing more information on the harms of smoking and positive impact of quitting – alongside further detail on how to do so. A study in Canada showed that smokers reading pack inserts more than a few times a month were more likely to quit.^v Since it can take smokers up to 30 attempts to quit, it is important to take every opportunity to support cessation.^{vi}
- Alongside their efficacy, they have support in the UK from smokers and non-smokers.
 - ASH Smokefree Great Britain survey found that 67% of adults in Great Britain support pack inserts.^{vii}
 - A 2018 study found that a majority of smokers would support the introduction of pack inserts and that 61% of smokers felt that pack inserts were a good way to provide information about quitting.^{viii}
- Messaging should, however, be tailored to the product concerned. Different products have different patterns of use and different health risks, and terminology appropriate to smoked tobacco may not be appropriate for smokeless products or heated tobacco devices. Government should therefore ensure that the content of inserts is evidence-based, relevant to the particular products and designed to maximise its potential to support cessation.
- We agree that cigarette papers should be exempt from pack-insert requirements because of their small packaging size.

Time allowed to implement new packaging requirements

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
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

Please explain your answer. This could include, for example, sharing comments on whether the proposed implementation period should be shorter or longer, or on implications that the proposed implementation period could have for manufacturers, retailers or other groups. Please reference any evidence that you have considered to support your response. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- We support a 12-month implementation period once the detailed requirements are clear and urge the Government to resist tobacco industry efforts to delay implementation.
- A sufficient implementation period is important to allow manufacturers, importers,

distributors, and retailers to prepare for the changes and to ensure that implementation is orderly and enforceable.

- However, the proposed period should not become a reason for unnecessary delay. Tobacco and vaping manufacturers have demonstrated that they can adapt to regulatory changes, and Government should resist attempts to extend implementation beyond what is reasonable necessary as tobacco companies did delay with standardised tobacco packaging and tobacco point-of-sale laws.^{ix}

Heated tobacco device appearance

Restricting the colour and finish of heated tobacco devices

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
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- The use of any type of tobacco product - including heated tobacco products - is harmful. More research is needed to understand the short- and long-term health effects of heated tobacco products.
- They have not been scientifically shown to help people who smoke cigarettes to quit, and are not recommended for smoking cessation by NICE.^{xi} It is likely that they are more harmful than vaping.^{xi}
- Awareness of heated tobacco is also rising, especially among young people. Among 11–17-year-olds, awareness of heated tobacco has risen from 7.1% in 2022 to 24% in 2025.^{xi} To combat this, we support measures to prevent HTPs designed to be less appealing, but still allowing functional lights, such as indicators showing charging or device status.

Restricting branding, imagery and artwork on heated tobacco devices

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

- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- We support restricting branding, imagery, and artwork on heated tobacco devices.
- The appearance of tobacco and nicotine products should not be used as a marketing mechanism. Branding, imagery, artwork, and other decorative features can increase product appeal and provide opportunities for manufacturers to target particular groups.
- Awareness of heated tobacco is also rising, especially among young people. Among 11–17-year-olds, awareness of heated tobacco has risen from 7.1% in 2022 to 24% in 2025.^x
- Standardising these features will help ensure that heated tobacco devices are not designed or presented in ways which appeal to CYP.

Restricting digital screens on heated tobacco devices

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
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

Please explain your answer. This could include, for example, sharing comments if you think there should be any exemptions to this proposal. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- We support restricting digital screens on heated tobacco devices to safety and status information, such as battery level, and requiring such displays to be greyscale.
- Digital features which serve no functional or safety purpose can increase the novelty and attractiveness of products. There is no public health benefit in allowing screens to display promotional, entertaining or decorative content.

Stopping heated tobacco devices imitating other products

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
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

Please explain your answer. This could include, for example, sharing comments if you think there should be any exemptions to this proposal. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- We support preventing heated tobacco devices from mimicking the design of other products or items.
- There is evidence that CYP are attracted to the discreet size of vapes, which makes them easier to conceal from authority figures such as parents or teachers, this could be similar to heated tobacco devices.^{xi} Manufacturers should therefore be prohibited from designing tobacco or nicotine products that resemble toys, games, cosmetics, confectionery, or other products associated with CYP.

Time allowed to implement new device requirements

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
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

Please explain your answer. This could include, for example, sharing comments on whether the proposed implementation period should be shorter or longer, or on implications that the proposed implementation period could have for manufacturers, retailers or other groups. Please reference any evidence that you have considered to support your response. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- See previous implementation response.

Vaping and nicotine product packaging and flavour descriptors

Restricting the colour on packaging for all vaping and nicotine products

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

- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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

- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

Please explain your answers. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- We support restricting the packaging of vaping and nicotine products to white.
- Bright and colourful packaging can make vaping products more attractive to CYP, including through designs which resemble sweets and other youth-oriented products.^{xii}
- Packaging should therefore be standardised to make such products less appealing to young people. Standardisation should, however, preserve the distinction between vaping products and tobacco, recognising the role of vapes as a cessation aid. A white standardised background provides an appropriate distinction from the drab dark brown of tobacco products, especially given the evidence that white vape packaging can reduce appeal to young people without deterring adults.

Restricting imagery, branding, text and other promotional features

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
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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
- Neither agree nor disagree
- Disagree
- Don't know

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. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- We support restricting imagery, branding, text and promotional features, especially to reduce the appeal of these products to children and young people.
- The appearance of vaping products should not be used as a marketing mechanism. Branding, imagery, artwork, and other decorative features can increase product appeal and provide opportunities for manufacturers to target particular groups.
- Standardising these features will help ensure that vaping products are not designed or presented in ways which appeal to CYP.
- However, it is also important that people are not deterred from switching to vaping.
- We support an approach that is based on the principle of reducing appeal of vapes to CYP, whilst still enabling limited innovation and appeal which may support a smoker to switch from tobacco products. Such an approach requires Government to provide clear guidance on how imagery, branding, text and promotional features can be used.

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

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
- Neither agree nor disagree
- Disagree
- Don't know

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
- Neither agree nor disagree
- Disagree
- Don't know

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
- Neither agree nor disagree
- Disagree
- Don't know

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

- Agree
- Neither agree nor disagree
- Disagree
- Don't know

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. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- We support uniform packaging shapes and restrictions on materials and finishes which enhance product appeal.
- We also support extending child-resistant and tamper-evident packaging requirements to all vaping and nicotine products. The main value of child resistant measures on vapes is likely to be for reducing the risk of harmful exposure to e-liquid.
- Regulation should prioritise measures proven to reduce risk, including leakproof e-liquid refill containers, secure tanks, and child-resistant packaging. While child-resistant device features, such as requiring multiple actions for activation, may help prevent use by very young children, they are unlikely to deter older children and teenagers. Similar considerations are likely to apply across all nicotine products.
- It is also important to note that adding too much complexity to the use of vapes also risks disadvantaging adult smokers with physical or learning disabilities who are looking to quit smoking by using vapes.

Restricting flavour descriptions on vaping and nicotine products packaging

Single lead flavour

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
- Neither agree nor disagree

- Disagree
- Don't know

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
- Neither agree nor disagree
- Disagree
- Don't know

Concept, sensory, food and drink categories

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
- Neither agree nor disagree
- Disagree
- Don't know

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
- Neither agree nor disagree
- Disagree
- Don't know

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
- Neither agree nor disagree
- Disagree
- Don't know

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
- Neither agree nor disagree
- Disagree
- Don't know

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
- Neither agree nor disagree

- Disagree
- Don't know

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
- Neither agree nor disagree
- Disagree
- Don't know

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. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- Evidence shows that children are attracted to fruit and sweet flavours, and this is contributing to the increase in youth vaping.^{xiii} Restricting child-friendly flavours has the potential to significantly reduce the number of children who are vaping or using nicotine products. Young people are around three times as likely to use chocolate/dessert/candy/energy/soft drink flavours in vapes compared to adults (12% vs 4%) so it is right that this descriptive category is removed.^{xiv}
- However, we are concerned that only allowing single-word descriptors risks creating confusion among consumers about which flavour they are buying. For example, if combo flavours like 'strawberry menthol' become 'strawberry' but still contain menthol. Allowing two-word descriptors would address this issue while still prohibiting youth-appealing descriptors and limiting the use of flavours as a marketing tool.
- Limiting flavours to protect children has a chance of impacting adult vaping behaviour too, with adults also showing a preference for fruit flavours.^{xv} This trade-off requires careful consideration to ensure overall rates of smoking do not increase as a result of flavour restrictions.
- Evidence suggests that restrictions limiting vape flavours to tobacco and, in some cases, menthol can reduce vaping prevalence. However, such measures may also lead to increased smoking, potentially resulting in unintended adverse impacts on public health.^{xvi} Consistent with this, 15% of adult vapers in Britain reported that restricting flavours to tobacco, mint, and menthol would increase their smoking, including initiating or retuning to smoking, compared with 6% who said it would help them reduce or stop smoking.^{xvii}

Product information on and inside vaping and nicotine products packaging

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
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- We support requiring clear consumer information on and inside the packaging of vaping and nicotine products.
- Consumers should have access to accurate and accessible information, including ingredients, flavouring agents, expiry information, and age restrictions.
- This should complement, rather than undermine, the standardisation of packaging. Standardised packaging can remove promotional features while still providing consumers with the information necessary to make informed decisions.
- Information should be presented consistently and in a clear format that is accessible to consumers.

Time allowed to implement new packaging requirements

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
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

Please explain your answer. This could include, for example, sharing comments on whether the proposed implementation period should be shorter or longer, or on implications that the proposed implementation period could have for manufacturers, retailers or other groups. Please reference any evidence that you have considered to support your response. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- See previous implementation response.

Vape device appearance

Restricting the colour and finish of vapes

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
- Neither agree nor disagree
- Disagree
- Don't know

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
- Neither agree nor disagree
- Disagree
- Don't know

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. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- We support limiting vape devices to white, black, or grey with a matt finish. There is evidence that CYP are attracted to the discreet size of vapes, which makes them easier to conceal from authority figures such as parents or teachers.^{xviii} The Government should therefore consider how changes to the discreetness and convenience of vaping and nicotine products could be used to reduce youth appeal, alongside restrictions on products designed to resemble youth-appealing items such as cartoons, toys, sweets and makeup.
- Restricting colours and finishes will reduce opportunities to use product appearance as a marketing mechanism. The restrictions should apply to all visible parts of the device and should

not allow variations in shades, opacity or decorative finishes which could recreate the promotional effect.

- We also support prohibiting cosmetic lights on vapes while retaining appropriate exemptions for genuinely functional lights, such as indicators showing charging or device status. Cosmetic lighting can make products more visually attractive and potentially increase their appeal, particularly to CYP.
- We support an approach that is based on the principle of reducing appeal of vapes to CYP, whilst still enabling limited innovation and appeal which may support a smoker to switch from tobacco products. Such an approach requires Government to provide clear definitions, particularly around terms such as 'cosmetic lights', so manufacturers and enforcement are aware of what is allowed.

Restricting branding, imagery, and artwork on vapes

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

- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- We support restricting branding, imagery, and artwork on vaping products.
- The appearance of tobacco and nicotine products should not be used as a marketing mechanism. Branding, imagery, artwork, and other decorative features can increase product appeal and provide opportunities for manufacturers to target particular groups.
- Standardising these features will help ensure that heated tobacco devices are not designed or presented in ways which appeal to CYP.
- However, it is also important that people are not deterred from switching to vaping.
- We support an approach that is based on the principle of reducing appeal of vapes to CYP, whilst still enabling limited innovation and appeal which may support a smoker to switch from tobacco products. Such an approach requires Government to provide clear guidance on how imagery, branding, text and promotional features can be used.

Restricting the digital screens on vapes

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

- Neither agree nor disagree
- Disagree
- Don't know

Please explain your answer. This could include, for example, sharing comments if you think there should be any exemptions to this proposal. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- We support restricting digital screens on vaping products to safety and status information, such as battery level, and requiring such displays to be greyscale.
- Digital features which serve no functional or safety purpose can increase the novelty and attractiveness of products. There is no public health benefit in allowing screens to display promotional, entertaining or decorative content.

Stopping vapes imitating 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
- Neither agree nor disagree
- Disagree
- Don't know

Please explain your answer. This could include, for example, sharing comments if you think there should be any exemptions to this proposal. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- We support preventing heated tobacco devices from mimicking the design of other products or items.
- There is evidence that CYP are attracted to the discreet size of vapes.^{xix} Manufacturers should not be permitted to exploit this by designing tobacco or nicotine devices to resemble toys, games, cosmetics, sweets or other products associated with children and young people.

Time allowed to implement new device requirements

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
- Neither agree nor disagree
- Disagree
- Don't know

Please explain your answer. This could include, for example, sharing comments on whether the proposed implementation period should be shorter or longer, or on implications that the proposed implementation period could have for manufacturers, retailers or other groups. Please reference any evidence that you have considered to support your response. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- See previous implementation answer.

Retail display

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

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
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

Cigarette papers, heated and other tobacco-related devices and herbal smoking 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
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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

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

- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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

- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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

- ☒ Agree
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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?

- ☐ Agree
- ☐ Neither agree nor disagree
- ☒ Disagree
- ☐ Don't know

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?

- ☐ Agree

- Neither agree nor disagree
- Disagree
- Don't know

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

- Agree
- Neither agree nor disagree
- Disagree
- Don't know

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. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- We disagree with the proposal to maintain the existing display exemption for specialist tobacconists. This would mean that premises selling lethal tobacco products are subject to weaker restrictions than those selling vapes, which are much less harmful. We recommend that this exemption is removed.
- Although not in the remit of this consultation, we also recommend that specialist tobacco shops are included in recent planning control changes for vape shops.

Display exemptions for bulk tobacconists

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

- Agree
- Neither agree nor disagree
- Disagree
- Don't know

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. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- We welcome plans to remove the display exemption for bulk tobacconists, duty free shops and airports. This exemption has allowed cheap tobacco to be promoted in duty-free shops, undermining the impact of the tobacco display ban.
- The Government should go further and prohibit the sale of duty-free tobacco altogether to

maximise the impact of tobacco taxation on quitting behaviour.

Restricting the display of vaping and nicotine products across the UK

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**
- Neither agree nor disagree
- Disagree
- Don't know

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**
- Neither agree nor disagree
- Disagree
- Don't know

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**
- Neither agree nor disagree
- Disagree
- Don't know

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. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- We support restricting the display of vaping and nicotine products. Exposure to vape promotion remains high among CYP, in 2024, 72% of 11–17-year-olds who are aware of vapes report they were exposed to some form of vape promotion, the majority of this being in shops (55%).^{xx}
- However, we recognise that vaping products are less harmful than tobacco products and have a role in supporting adult smokers to quit.
- Evidence from King's College London suggests that a total display ban could exacerbate misperceptions about the harm of vapes compared to tobacco among adult smokers, potentially deterring them from switching to vaping or increasing the risk that existing vapers will relapse to smoking.^{xxi} Evidence from the annual ASH Smokefree GB survey shows that adults who think that vaping is as or more harmful than smoking are significantly more likely to report trying smoking as a way to quit vaping, and are much less likely to be interested.
- We therefore believe that vapes should only be kept behind the counter but can remain on

limited display with no other instore or externally visible promotion, providing that regulations have been implemented to remove child-friendly packaging and labelling. This is indicative of the lower level of risk of vapes compared to tobacco products, whilst at the same time this measure can reduce the exposure of children to vapes.

Display of prices of vaping and nicotine products across the UK

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
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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

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
- ☐ Neither agree nor disagree
- ☐ Disagree
- ☐ Don't know

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. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- We support the proposal to allow a limited display of vaping and nicotine products inside community pharmacies, recognising that this could help people to try and quit smoking.

Time allowed to implement all new display restrictions

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

- ☒ Agree

- Neither agree nor disagree
- Disagree
- Don't know

Please explain your answer. This could include, for example, sharing comments on whether the proposed implementation period should be shorter or longer, or on implications that the proposed implementation period could have for manufacturers, retailers or other groups. Please reference any evidence that you have taken into account to support your response. (Optional, maximum 600 words. Please do not include any personal information in your response.)

ADPH response:

- See previous implementation response

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^{ix} Cancer Research UK. [Market and tobacco industry response to standardised tobacco packaging in the UK](#). December 2020.

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^{xii} Simonavicius E, East K, Taylor E, Nottage M, Reid JL, Arnott D, et al. Impact of e-liquid packaging on vaping product perceptions among youth in England, Canada, and the United States; a randomised online experiment. *Nicotine & Tobacco Research*. 2023;26(3). Available from: <https://pubmed.ncbi.nlm.nih.gov/37542732/> [Accessed November 2025]

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