

September 2026.

Royal College of Physicians of Edinburgh response to the four nation consultation on Tobacco and vapes: packaging, appearance and display.

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**
- 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.)

The College strongly supports these proposals and sees them as playing a significant role in reducing the visual appeal of these products and therefore overall use. We would like to see them introduced as comprehensively as possible. Wherever possible, we think there is merit in alignment across all products. We would also support additional measures to include the equivalent heated herbal products. The requirements should cover packaging for heated tobacco devices as well as the products used with them, to prevent branding shifting between the two.

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**
- 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.)

Again, we strongly support these proposals and consider that they are important in terms of reinforcing public health warnings. We are aware that they may help disincentivise or reduce usage, particularly for smokers who may have already received similar medical advice and who are already considering reduction/cessation. We are aware of the success of text health warnings internationally.¹

¹ Cunningham R, *Tobacco package health warnings: a global success story*, *Tobacco Control*, 2022. Available at: <https://tobaccocontrol.bmj.com/content/31/2/272>

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
- 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.)

Again we welcome these proposals and believe that these will enhance text-based disincentives and play an important role in terms of users with poorer literacy.

Our Fellows and Lay Committee members had a range of views regarding the exclusion of picture health warnings on cigarette papers. Some believed further consideration should be given to issues around the minimum size of cigarette paper packaging so that visual images could be included.

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
- 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.)

Again these proposals are generally positive and will build on the impact of text and pictorial warnings.

Some Fellows and Lay Committee members were opposed to the decision not to require cigarette papers packaging to contain inserts and believe this should be re-examined with all options considered, including the inclusion of folded inserts.

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
- 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.)

We consider that 12 months seems appropriate and would not support any period longer than 12 months.

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
- 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.)

We support this and consider the proposed colour to be appropriate. We are very keen to see the appeal of such products reduced, including through this type of marketing.

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**
- 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.)

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**
- 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.)

We support these plans and do not consider that there should be exemptions. We need to reduce their appeal, including to younger people and these proposals can help with this. There is no justification for digital screens to be features of these devices.

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
- 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.)

Again we consider this an important restriction and we welcome its alignment with the proposal for vape devices.

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
- 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.)

We consider that 12 months seems appropriate and would not support any period longer than 12 months.

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
- 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.)

Our Fellows have a range of views about the appropriateness of white and we believe that further consideration must be given to all the available evidence before a final decision is taken. A number of Fellows highlighted their view that white was inappropriate and suggested sepia, black, grey or off white was preferable as white could be considered too ‘clean’ or ‘healthy’ a representation. Fellows questioned the use of white here when the existing tobacco framework in relation to cigarette packaging restricts the colour to Pantone 448C (drab dark brown) as it is identified as the least appealing colour, particularly to young people. It seems logical for this colour choice to apply to vaping and nicotine products too. There are various academic studies on this subject including from the Center for Tobacco Control Research and Education at the University of California, San Francisco. We would also highlight the studies from the University of Oxford on white vs brown packs¹ and from the University of Stirling on the response of younger smokers.²

With regard to all the proposals on vaping products in this consultation, while we are aware that governments have said that product ingredients, ingredient safety and amounts are outwith the remit of this consultation, Fellows were anxious to emphasise that they believed manufacturers should be providing detailed composition, emissions and toxicology reports for products before

authorisation. They are also anxious to see full product traceability. They urge governments to take these matters forward as a priority.

Fellows also identified proper surveillance as a key issue. Manufacturers should report sales, product composition and adverse events, with independent research looking particularly at children, pregnancy and cardiovascular and respiratory outcomes. GPs should record vaping as they record smoking and there should be a national clinical code for it. We need to distinguish current and previous vaping and, importantly, dual use. Without this information we will still be trying to work out the long-term effects in 20 years' time from inadequate records.

¹ Hammond D, White C, Anderson W, Arnott D, Dockrell M. *The perceptions of UK youth of branded and standardized ("plain") cigarette packaging*. European Journal of Public Health 2014. Available at: <https://academic.oup.com/eurpub/article/24/4/537/638911>.

² Moodie C, Mackintosh AM, Young adult women smokers' response to using plain cigarette packaging: a naturalistic approach, BMJ Open, 2013. Available at: <https://bmjopen.bmj.com/content/3/3/e002402>

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**
- 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.)

We support these proposals and consider there are very few, if any, grounds for exemption.

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
- 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.)

These are welcome proposals which may also contribute to reducing inadvertent and underage use.

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**
- 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

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
- 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

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
- 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.)

We consider these to be positive and important proposals, especially in relation to making these products less appealing to younger people. We are very concerned about the number of younger people who are using vaping products as primary products and not to help with smoking cessation.

However, Fellows pointed out that while agreeing names such as "cotton candy" should go, changing the name does not change the chemical. "Strawberry ice" with another name is still strawberry ice. They argue that the flavouring itself, including what is produced when it is heated, needs to be known and question why any flavours should be allowed without evidence that they are safe to inhale. We therefore urge the government to assess the inhalation safety of flavouring ingredients and their heated emissions, separately from these packaging rules.

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
- 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.)

Lay Committee members indicated that consideration should be given to the inclusion of a ‘not during pregnancy’ symbol similar to that used on alcohol. In addition, the element around correct waste disposal could also outline the penalties potentially liable on those for incorrect disposal to encourage compliance.

Fellows also indicated their concern that pregnancy is hardly mentioned at all in the consultation and they consider this to be a significant omission. They support packets carrying a clear warning about harms in pregnancy, and possible effects on the mother, placenta and fetus should be considered when setting product standards. They emphasised the need to be careful with the wording. Vaping is unsafe in pregnancy, but smoking is almost certainly worse, so we must not encourage women who have switched completely to start smoking again. We also need prospective data on pregnancy and neonatal outcomes.

In addition, Fellows supported a provision for information to be made available on reporting adverse effects and a QR code linked to the authorised product and its safety data.

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
- **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.)

We consider that 12 months seems appropriate and would not support any period longer than 12 months.

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
- **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.)

We broadly support these measures which we hope may lessen the appeal of these products, especially to younger people. Again a number of our Fellows highlighted their view that white was inappropriate and suggested black or grey was preferable as white could be considered too 'clean' or 'healthy' a representation and we hope that all the evidence can be looked at carefully in this regard before a final decision is taken. Again there seems to be logic in also using the Pantone 448C (drab dark brown) colour used for cigarettes.

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
- 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.)

We very much support this measure which we hope may lessen the appeal of these products, especially to younger 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**
- 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.)

Once again, we hope this restriction might help lessen the appeal of these products, especially to younger people. There is no credible justification for promotional content on digital screens on vapes.

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**
- 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.)

We support this move and believe it may help reduce the appeal of these products. We do not envisage there will be a need for exemptions.

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
- **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.)

We consider that 12 months seems appropriate and would not support any period longer than 12 months.

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

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**
- 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

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.)

We strongly support extending retail display restrictions to cigarette papers, heated and other tobacco-related devices, and herbal smoking products. Visible accessories and devices can continue to draw attention to smoking even when tobacco itself is concealed. Requiring any requested display to take place behind the counter would make the restrictions more consistent and help prevent routine exposure, particularly among children and young people. Evidence from Scotland found lower smoking susceptibility among young people after tobacco point-of-sale display restrictions were introduced.(ref) We therefore support closing the remaining gaps in what can be displayed.

[https://www.ncbi.nlm.nih.gov/books/NBK553057/Retail display of prices for cigarette papers, heated and other tobacco-related devices and herbal smoking products in England, Wales and Northern Ireland](https://www.ncbi.nlm.nih.gov/books/NBK553057/Retail%20display%20of%20prices%20for%20cigarette%20papers,%20heated%20and%20other%20tobacco-related%20devices%20and%20herbal%20smoking%20products%20in%20England,%20Wales%20and%20Northern%20Ireland)

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
- 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

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.)

Again we welcome the alignment with the retail display of price restrictions on other tobacco products. Price lists should remain factual and should not use images, formatting or placement that turns them into promotion

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
- **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 in relevant trade premises?

- 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 in relevant trade premises?

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

Please explain your answers. 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.)

Some Fellows raised concerns about these exemptions and consider that they should be looked at again. They further raised the issue of tobacco products still being allowed to be displayed in Duty Free retail at airports and consider this should be examined since it can expose younger people to these products. We support these exemptions only where access is genuinely restricted to people working in the tobacco trade and displays cannot be seen by the public. We also strongly support the separate proposal to remove the bulk tobacconist exemption, including in duty-free areas accessible to children and young people.

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.)

We accept these limited exemptions inside specialist tobacconists, provided that products and prices cannot be seen from outside the premises. The exemptions should not permit window displays or other promotion visible to the general public.

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**
- 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.)

We strongly support removing the bulk tobacconist exemption and not extending it to other products. Displays in publicly accessible areas, including duty-free shops, can expose children and young people to tobacco products and their prices. The same public health principle should apply across retail settings.

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

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
- 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

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

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
- Other (please specify)

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**
- 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, or comments in relation to the proposed maximum visible area of display unit permitted as a result of a requested or incidental display for waterpipes, like shisha. (Optional, maximum 600 words. Please do not include any personal information in your response.)

We support consistent restrictions across these products, with displays taking place only from behind the counter and incidental exposure kept to a minimum. We support retaining the 0.1 m² limit for heated tobacco devices and herbal smoking products. Waterpipes may require more space because of their size, but any exception should allow only the space needed to show a single waterpipe following a customer request, rather than a larger promotional display. The list of smoking-related products should be reviewed and kept up to date as new devices and accessories enter the market.

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**
- 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

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.)

The alignment with current regulations on tobacco products is welcome. This would close a gap in the current restrictions and ensure that price information remains available to customers without becoming a prominent retail promotion. Price lists should be factual and presented consistently; images should be shown only in response to a customer request, as proposed.

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**
- 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 prices in relevant trade premises in Scotland?

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

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

We accept these exemptions where access is genuinely limited to people working in the tobacco trade. The conditions should be clear and enforced, and products and prices must not be visible to the public from outside the premises. No exemption should apply to areas accessible to children or other members of the public.

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?

- 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 prices inside specialist tobacconists in Scotland?

- 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.)

We would like to see this reviewed and consideration given to the risk that these premises may still be accessible to the general public and to younger people. Specialist tobacconists are accessible to the public, including young people. At a minimum, displays of heated tobacco devices, herbal smoking products and their prices should not be visible from outside the premises. The Government should explain why allowing these displays is necessary and how exposure of children and young people inside the shop will be limited.

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

We strongly support removing the bulk tobacconist exemption and not extending it to other products. Displays in publicly accessible areas, including duty-free tobacco areas, can expose children and young people to these products and their prices.

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**
- 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.)

We strongly support restricting the retail display of vaping and nicotine products. Prominent displays can make these products appear routine and attractive, particularly to children and young people. Applying consistent rules to devices, components and refill containers is important so that displaying one part of a product cannot become a way around the restriction.

We also support requiring requested displays to take place from behind the sales counter and ensuring that neither requested nor incidental displays expose tobacco products, cigarette papers, tobacco-related devices or herbal smoking products. Retailers should be able to provide factual information to a customer who asks, while keeping exposure of other shoppers to a minimum.

The permitted visible area, particularly the larger 1.5 m² allowance outside Scotland, should be kept under review to ensure temporary or incidental displays do not become promotional displays in practice.

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

- 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

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.)

We support restricting the display of prices for vaping and nicotine products while allowing factual information on nicotine strength and ingredients to help customers make informed choices. Price lists should use a standard, neutral format, without promotional wording, colour, imagery or prominent discount claims.

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

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

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

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

We accept the exemption only where access is genuinely restricted to people working in the relevant trade and the products and prices cannot be seen from outside. The exemption should not extend to areas accessible to customers, children or the wider public.

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
- 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.)

Some Fellows had real concerns about this exemption and stated that they were only comfortable with pharmacies being permitted to display nicotine replacement therapies, such as nicotine gum, inhalators and patches, which are intended solely to support smoking cessation and do not contain the other harmful constituents associated with other products.

They felt this exemption should not be extended to vaping products and noted that vapes are not essential for smoking cessation and that there is growing evidence that their use can become a long-term habit, rather than serving as a temporary aid to help people gradually reduce and ultimately stop smoking.

Pharmacy displays may give an impression of clinical endorsement, including to young people and people who have never smoked. We would prefer these products to remain available through appropriate advice to adults seeking to stop smoking, without a general visible display exemption. Medicinally licensed nicotine replacement therapies should remain readily accessible. If an exemption is introduced, it should be narrowly limited to cessation support, with no promotional presentation or visibility from outside the pharmacy .

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 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.)

We consider that 6 months is more than sufficient and should be a maximum time allowed.

One important issue our Fellows wished to raise in relation to the restrictions generally was the role of Trading Standards and the need for them to have enough staff and money to test products and remove illegal ones quickly. It was suggested that the new duty stamp could be linked to the authorised-product register so that anyone can check whether a product is legally on sale. Fellows pointed out that more regulation without money and staff to enforce it will achieve very little.