

BPRS

British Paediatric Respiratory Society

Tobacco and vapes: packaging, appearance and display

Response to the Department of Health and Social Care consultation

September 2026

The consultation questions, selected responses and comments are reproduced in their original order. The wording is unchanged; the layout and line wrapping have been reformatted for reference.

About you

In what capacity are you responding to this survey?

On behalf of an organisation

Do you have any direct or indirect links to, or receive funding from, the tobacco industry?

No

What is the size of your organisation?

Small (0 to 49 employees)

Where does your organisation operate or provide services?

The whole of the UK

Please provide the name of the organisation you are responding on behalf of.

British Paediatric Respiratory Society

What is the main area or focus of your work?

Healthcare

Do you work for, or are you providing views on behalf of, any of the following?

None of the above

Tobacco packaging

Would you like to answer the questions in this section?

Yes

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?

Agree

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

Agree

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

Agree

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

Agree

Please explain your answers.

The British Paediatric Respiratory Society (BPRS) strongly supports extending plain packaging requirements across all of these products. There is now substantial experience from cigarettes and hand-rolling tobacco that standardised packaging can reduce product appeal, particularly among young people, diminish the promotional value of packaging and make health warnings more prominent. There is no convincing public health justification for allowing other tobacco products or tobacco-related products to retain branding, colours, imagery or premium packaging that would no longer be permitted for cigarettes. The Government's own impact assessment recognises that branded packaging acts as a form of promotion and that attractive packaging can encourage uptake. We therefore support applying broadly consistent requirements - including Pantone 448C, a matt finish, tightly standardised branding and restrictions on imagery, shape and materials= across all tobacco products. This is particularly important in preventing regulatory loopholes and product substitution as the tobacco and nicotine market continues to evolve.

We also strongly support plain packaging for heated tobacco devices. Heated tobacco remains a tobacco product, exposes users to toxic and carcinogenic compounds, and does not have the established smoking-cessation evidence base that exists for nicotine vaping in adults. Attractive, highly branded devices risk presenting these products as modern, desirable or relatively benign, particularly to adolescents and young adults.

The same principle should apply to herbal smoking products. "Herbal" must not be allowed to imply harmlessness: combustion produces harmful substances including carbon monoxide and carcinogenic compounds. Attractive or "natural" presentation risks misleading consumers, including young people.

Finally, BPRS supports plain packaging for cigarette papers. These are an integral part of smoking behaviour and their branding provides an avoidable route for the continued promotion and normalisation of smoking culture. Any product-specific exemptions needed for practical packaging reasons should therefore be narrowly drawn and technical only, and should not recreate opportunities for branding or marketing. For BPRS, the principle is straightforward: products that facilitate tobacco use should not be permitted to advertise themselves through their packaging.

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

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

Agree

Please explain your answers.

BPRS supports text warnings on heated tobacco device and cigarette paper packaging. Heated tobacco warnings should explain that using the device to consume tobacco exposes the user to harmful substances and can cause nicotine dependence. A review found exposure to toxicants, generally at lower levels than cigarettes; this does not make heated tobacco harmless (Simonavicius et al., Tobacco Control, 2019;28:582-594). Warnings on cigarette papers should address the harms of smoking, including when papers are used with herbal products. They should not imply that papers contain nicotine or are the principal source of tobacco-related harm. Wording should be tested for understanding, remain prominent when packs are opened or resealed, and direct users towards independent cessation

support. It should describe each product accurately without suggesting that all tobacco and smoking-related products have identical risks.

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?

Agree

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

Agree

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

Agree

Do you agree or disagree that picture health warnings should not be required on the packaging of cigarette papers?

Agree

Please explain your answers.

We support picture warnings across the products listed, but the images and wording should reflect the evidence for each product. Differences in risk do not justify leaving harmful products without appropriate warnings, nor should consistent regulation imply identical harms. The strongest evidence concerns cigarette packs. A meta-analysis found pictorial warnings more effective than text-only warnings for attention, attitudes and intentions to avoid or stop smoking (Noar et al., Tobacco Control, 2016;25:341-354). The effect should be evaluated when extended to other products.

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?

Agree

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

Agree

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

Agree

Do you agree or disagree that pack inserts should not be required in the packaging of cigarette papers?

Agree

Please explain your answers.

BPRS supports quit-themed inserts for all the products listed. The content should offer practical help rather than simply repeat the external health warnings. Canadian observational studies found that reading inserts was associated with later quit attempts, including attempts lasting at least 30 days. This supports their potential value, but does not establish an effect on long-term abstinence (Thrasher et al., Nicotine & Tobacco Research, 2015;17:870-875; Thrasher et al., Preventive Medicine, 2016;88:59-65). Information should be appropriate to the product. Heated tobacco devices are used to consume tobacco; a device sold separately does not necessarily contain tobacco. Nicotine-withdrawal advice will not apply to every herbal smoking product. Inserts should direct users to independent cessation services, with telephone as well as online routes. We accept the exemption for small cigarette paper

packs. Inserts offer an opportunity to support quitting but should not replace measures to prevent children starting.

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)?

Disagree

Please explain your answer.

BPRS would prefer a six-month transition once complete specifications, warning artwork and insert requirements are available, rather than making 12 months the minimum. This is a proposed timetable, not a period established by comparative evidence. Manufacturers should identify any production, safety-testing or supply-chain requirement that genuinely needs longer. Any extension should be limited to that requirement and have a fixed end date. The timetable should specify the last dates for manufacturing, importing and selling non-compliant stock. The retail deadline should include sell-through, rather than be followed by another unrestricted period. Clear specifications and coordinated guidance would help businesses avoid repeated redesigns.

Heated tobacco device appearance

Would you like to answer the questions in this section?

Yes

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

Do you agree or disagree that heated tobacco devices should be banned from having cosmetic lights?

Agree

Please explain your answers.

BPRS supports both proposals. Heated tobacco devices should not be allowed to function as attractive lifestyle products. Their current appearance can make them look more like desirable consumer electronics than devices used to consume tobacco, and this is particularly relevant for children and young people. Using Pantone 448C with a matt finish is sensible because it aligns the device visually with other tobacco products and removes colour, gloss and other design features that can add appeal. We would not favour allowing a range of alternative colours, as this would create obvious scope for product differentiation and marketing. We also support banning cosmetic lights. There is no public health justification for decorative lighting on a heated tobacco device, and such features can make products more conspicuous and appealing. Functional indicators, such as battery or charging status, are reasonable provided they are limited to what is necessary for safe use. Any technical exemptions should be tightly defined so that they cannot be used to reintroduce branding or decorative features by another route.

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

Please explain your answer.

BPRS supports the proposed restrictions on branding, imagery and artwork on heated tobacco devices. There is no good reason for these devices to carry decorative imagery, artwork, logos or other visual features that make them more attractive or distinctive. Heated tobacco devices are used to consume tobacco and should not be presented in a way that makes them resemble desirable consumer technology or lifestyle products. We support limiting branding to a single brand name in a standardised font, size and colour. This allows basic product identification without preserving unnecessary opportunities for marketing. From a child health perspective, this is important because the device itself is highly visible when in use and can act as a form of promotion. Removing visual branding should therefore sit alongside restrictions on colour, finish, packaging and retail display. Any exemptions should be limited to information required by law or genuinely necessary for safe use. They should not provide a route for manufacturers to reintroduce promotional design features in another form.

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

Please explain your answer.

BPRS supports restricting digital screens on heated tobacco devices to essential safety and status information only, with displays limited to greyscale. There is no need for these devices to display animations, images, games, decorative graphics or other content unrelated to safe operation. Such features add novelty and appeal without providing any health or functional benefit, and are particularly inappropriate on products that may be attractive to children and young people. A limited greyscale display for information such as battery level, charging status or device fault warnings is reasonable. Any exemptions should be narrowly defined and based on a clear safety or technical need. The aim should be to prevent the screen becoming another route for branding, entertainment or product differentiation. Given the speed at which device design evolves, the regulations should also be drafted broadly enough to cover future interactive or connected features rather than only those currently on the market.

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?

Agree

Please explain your answer.

BPRS strongly supports preventing heated tobacco devices from mimicking other products. There is no legitimate reason for a tobacco device to be designed to resemble a drink bottle, gaming device, stationery item or other everyday consumer product. Such designs can increase novelty and appeal, particularly for children and young people, and can also make products harder for parents, teachers and others to recognise. The restriction should be drafted broadly enough to cover not only overall shape, but also features such as size, controls, screen design, lighting and other characteristics that make a device resemble another product. We do not see a case for exemptions other than where a feature is genuinely necessary for safe use or to meet another regulatory requirement. Given the pace of product innovation, the regulations should also allow rapid action where manufacturers develop new designs intended to circumvent the rules. The principle should be clear: heated tobacco devices should be readily identifiable as tobacco-related products and should not be disguised as, or borrow appeal from, unrelated consumer goods.

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)?

Disagree

Please explain your answer.

BPRS would prefer six months from publication of final technical specifications, rather than a blanket minimum of 12 months. We do not have evidence that every device can be redesigned within six months. Changes to housings, electronics or software may require testing, and manufacturers should provide evidence where a specific requirement needs longer. Removing printed branding should not automatically wait for unrelated hardware changes. Any extension should be limited and have a published end date. There should also be a final retail deadline, with no open-ended sell-through allowance. Requirements should apply to new supply rather than require consumers to discard devices they already own.

Vaping and nicotine product packaging and flavour descriptors

Would you like to answer the questions in this section?

Yes

Definition of vaping products

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

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

Agree

Please explain your answers.

BPRS supports plain white packaging for vaping products and non-medicinal nicotine products, including separately sold refills and components. White packaging should be accompanied by restrictions on imagery, branding and descriptors, not treated as sufficient on its own. In a GB experiment, standardised white vape-pod packaging reduced perceived peer interest among young people, while adult interest was not significantly reduced by the usual or limited flavour-descriptor versions (Taylor et al., Lancet Regional Health Europe, 2025;58:101442). Findings are not uniform: an earlier study found a significant youth effect for green, but not white, standardised packs (Taylor et al., JAMA Network Open, 2023;6:e231799). We regard white as a reasonable regulatory choice, not a colour proven uniquely effective. Keeping vape packaging distinct from tobacco packaging can avoid suggesting identical risks. Warnings must also prevent any impression that white packaging means medical approval. Restrictions should cover the outer pack, sleeves and inner packaging. Licensed nicotine replacement medicines should remain outside these consumer-product rules.

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

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

Please explain your answers.

BPRS supports removing imagery, logos and promotional features from the packaging of vaping and non-medicinal nicotine products. A standardised brand name, product identification and necessary consumer information are sufficient. Experimental evidence supports addressing wording as well as appearance. Standardised e-liquid packs with coded brand names and limited flavour descriptors reduced perceived peer interest among young people, whereas white packs retaining usual descriptors did not show a significant difference from branded packs (Taylor et al., *Addiction*, 2025;120:620-628). The rules should cover the inside and outside of packs, sleeves, attached labels, vouchers and social-media links. Brand or variant names should not recreate prohibited flavour descriptions or imply health benefits. We would not support a general exemption for product photographs. Where adults need to identify a compatible coil or mouthpiece, a small standardised technical diagram could be allowed if written identification is insufficient. This should be limited to practical information, without decorative presentation. QR codes should lead only to necessary safety, traceability, disposal or independent support information, without marketing redirects.

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

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

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

Agree

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

Agree

Please explain your answers.

BPRS supports uniform packaging shapes and restrictions on decorative materials and finishes for both vaping and non-medicinal nicotine products. Packaging should protect the contents and provide information, without resembling sweets, toys or cosmetics. Experimental research has shown that standardised vape packaging can reduce young people's interest in trying the products (Gomes et al., *Public Health*, 2024;230:223–230). This supports removing promotional design features, although it does not establish the effect of each individual shape or finish. Uniformity should be applied sensibly within each product category. Bottles, pouch containers and boxes containing devices or coils need not have identical shapes. Permitted formats should accommodate safe closures and protect the contents, without allowing novelty designs. Restrictions should cover inner packaging, sleeves and multipacks as well as the outer box. We particularly support extending child-resistant and tamper-evident packaging requirements. US poison-centre data have documented serious outcomes following nicotine liquid exposure in young children, providing a clear reason to prevent accidental access (Kamboj et al., *Pediatrics*, 2016;137:e20160041). Child resistance must continue after first opening. A tamper-evident

seal shows whether a product has been opened; it does not protect a child once that seal has been removed. Refillable bottles and nicotine pouch containers should retain effective child-resistant closures throughout normal use. We would also ask that the design of compartments for storing used pouches is included in safety assessments. Compliance should require testing against recognised standards, rather than a manufacturer's assurance alone. Testing should consider repeated opening and closing, leakage and foreseeable handling by children. Necessary tactile warnings and features that help adults with impaired vision or dexterity should remain permitted. Recyclable materials and minimal packaging should be encouraged where they meet these safety requirements. Clear storage advice remains important, but should never substitute for packaging that prevents children gaining access.

Restricting flavour descriptions on vaping and nicotine products packaging

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

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

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

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

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

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

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

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

Please explain your answers.

BPRS supports all eight proposals. The same rules should apply to vaping and other non-medicinal nicotine products, including pouches. A GB experiment found that standardised packs with limited flavour and brand descriptors reduced perceived peer interest among young people (Taylor et al., *Addiction*, 2025;120:620-628). This supports removing promotional wording, but does not establish that a single lead flavour is the optimal rule. Changing a name may reduce appeal, but it leaves the formulation unchanged. Government should therefore publish a timetable for addressing flavourings themselves, especially those associated with sweets and desserts. This follows BPRS's January 2025 parliamentary evidence supporting restrictions on flavourings attractive to children. In a US cohort, adolescents using non-traditional flavours were more likely to continue vaping and take more puffs per episode six months later. The study did not show more vaping days or episodes per day, and did not test flavour bans (Leventhal et al., *Pediatrics*, 2019;144:e20190789). Sweeteners and cooling agents

warrant specific assessment. Further restrictions should be evaluated for effects on youth initiation, adult smoking cessation and illicit supply. Brand names and codes must not become substitutes for prohibited descriptors. A single sales descriptor must not replace full ingredient disclosure.

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

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

Please explain your answers.

BPRS supports standardised consumer information on both vaping products and other nicotine products. At present, nicotine strength is presented inconsistently, which risks confusion for consumers. A UK analysis of vape packaging found wide variation in how nicotine content was displayed, including mg/ml, percentages, graphics and descriptive terms, supporting the case for a single clear format (Ford et al., Nicotine & Tobacco Research, 2025;27:152–156). For vapes, nicotine concentration should be stated in mg/ml, together with the total liquid volume and total nicotine content. A percentage could be shown additionally, but not instead. For nicotine pouches, the amount should be stated clearly in mg per pouch, with the number of pouches per container. Terms such as “strong”, “extra strong”, coloured dots or similar devices should not substitute for numerical information. We support full ingredient disclosure, including flavouring agents, sweeteners and cooling agents. Simply listing “flavourings” would not provide sufficient transparency. This is particularly important as product formulations continue to change rapidly. Nicotine delivery per puff or pouch requires more caution. Nicotine content, machine-measured delivery and the amount actually absorbed by an individual are not the same thing. Any delivery figure should therefore use a validated and standardised method and should not imply a precise absorbed dose where this cannot be supported. Prominent warnings that nicotine is highly addictive are appropriate for all nicotine-containing products. Age-restriction symbols are also useful, but should support rather than replace robust age verification at sale. Nicotine-free products should not carry inaccurate nicotine warnings. Instruction leaflets should cover safe use, accidental exposure, adverse effects and storage, and should provide independent advice on stopping nicotine use. Clear waste-disposal information is also important for batteries, residual liquids and used pouches. These measures should apply consistently across consumer nicotine products to avoid loopholes and product substitution. The aim should be simple, accurate information that helps adult consumers make informed choices while making clear that these products are not intended for children.

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)?

Disagree

Please explain your answer.

BPRS would prefer a six-month transition once the final requirements are complete, rather than a minimum of 12 months. The evidence on packaging appeal supports acting promptly, but does not establish the optimal implementation period. Child-resistant closures and new pack formats may also require testing beyond changes to printing. Any request for more time should identify the technical reason and the products affected. Packaging, warnings, ingredient information and descriptor requirements should be coordinated where possible to avoid repeated redesigns. There should be a clear final date for retail sale of non-compliant stock, with any sell-through period included within that timetable.

Vape device appearance

Would you like to answer the questions in this section?

Yes

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

Do you agree or disagree that vape devices should be banned from having cosmetic lights?

Agree

Please explain your answer.

BPRS supports restricting vape devices to a single matt white, black or grey finish and banning cosmetic lights. Device appearance is part of the appeal of vaping to young people. In a large randomised experiment across England, Canada and the USA, standardised white vape devices reduced interest in trying them compared with branded devices (Tattan-Birch et al., Tobacco Control, 2026;35:489–497). UK qualitative work has also found that young people regard brightly coloured devices as fashionable and attractive (Smith et al., BMJ Open, 2023;13:e068466). Functional lights for charging, battery status or safety warnings are reasonable, but decorative lighting has no necessary purpose and should not be permitted. The restrictions should apply to all visible parts supplied with the device, including pods, mouthpieces and covers, so that colour and branding cannot simply be shifted onto interchangeable components.

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

Please explain your answer.

BPRS supports restricting branding, imagery and artwork on vape devices, with only a single brand name permitted in a standardised font, size and colour. Gomes and colleagues found that standardised outer packaging reduced interest in trying vapes, while a separate experiment showed that device skins appealed differently to particular subgroups (Gomes et al., Public Health, 2024;230:223-230). More directly, standardising device colour and branding reduced stated interest among 16 to 29-year-olds, including those who smoked (Tattan-Birch et al., Tobacco Control, 2026;35:489-497; doi:10.1136/tc-2024-059210). This matters because vape devices are highly visible in use and can themselves act as advertising. Young people in UK focus groups have described brightly designed disposable vapes as “cool”, fashionable and akin to lifestyle accessories (Smith et al., BMJ Open, 2023;13:e068466). The restriction should apply to the whole visible device, including pods, mouthpieces, covers and interchangeable panels. Required safety markings and traceability information should remain permitted, but there should be no route to reintroduce promotional design through accessories or replacement parts.

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)?

Agree

Please explain your answer.

BPRS supports restricting digital screens on vapes to essential safety and status information only, with displays limited to greyscale. There is no good reason for screens to be used for games, animations, personalised graphics, rewards, puff competitions or other entertainment features. These functions add novelty and can make devices more appealing to children and young people. This sits alongside wider evidence that device design and visual presentation influence youth interest in vaping (Gomes et al., Public Health, 2024;230:223–230; Tattan-Birch et al., Tobacco Control, 2026;35:489–497). Screens should be permitted only where they provide information needed for safe use, such as battery level, liquid level, charging status, fault warnings or genuinely necessary settings. The restriction should also apply after software updates and where the device connects to an app. A puff counter should not be used as a game or reward mechanism. Any exemption should be based on a clear safety or accessibility need, not on product differentiation or entertainment.

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?**

Agree

Please explain your answer.

BPRS supports a clear prohibition on vapes being designed to mimic other products. There is no legitimate reason for a vape to resemble a highlighter, drinks bottle, cosmetic item, toy or gaming device. These designs make products harder for parents and schools to recognise, while also borrowing appeal from familiar consumer products used by children and young people. UK qualitative research has shown that young people see disposable vapes as fashionable lifestyle accessories, and specifically identify bright colours, flavours and product design as reasons they are attractive (Smith et al., BMJ Open, 2023;13:e068466). Experimental evidence also shows that branding and device design influence interest in trying vapes among young people (Gomes et al., Public Health, 2024;230:223–230). The restriction should therefore cover the overall appearance of the device, including shape, controls, screen design, lighting and interchangeable parts, not simply logos or colour. A device should not be allowed to avoid the rule by copying the form of another product while using different branding. Any exemption should be limited to features genuinely required for safe operation or accessibility. The legislation should also be broad enough to capture future designs, rather than relying on a fixed list of products currently being imitated.

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)?**

Disagree

Please explain your answer.

BPRS does not support a minimum 12-month implementation period for these device requirements. We think 6 months from publication of the final technical specifications would be a more proportionate starting point. The evidence already supports the direction of travel. A randomised experiment found lower stated interest in standardised white devices among people aged 16 to 29, including those who smoked (Tattan-Birch et al., Tobacco Control, 2026;35:489-497). Once Government has decided to act, there is little public health benefit in leaving more appealing products on the market for a further year. We recognise that some changes to housings, electronics or software may require safety testing or changes to manufacturing lines. Where manufacturers can demonstrate that a specific technical requirement genuinely needs longer, a limited extension could be considered for that element. There should also be a clear final date for retail sale of non-compliant devices, rather than an additional prolonged sell-through period. There is no direct evidence that 6 months is the optimal implementation

period, so this is a pragmatic BPRS recommendation balancing feasibility with the need to realise the public health benefit without unnecessary delay.

Retail display

Which questions, if any, would you like to answer?

Questions about proposed policy in England, Wales and Northern Ireland, Questions about proposed policy in Scotland

Requested temporary and incidental displays in England, Wales and Northern Ireland

Restricting the retail display of 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 introduce a legal requirement that the requested temporary display of all tobacco products must take place from behind a sales counter?

Agree

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

Agree

Do you agree or disagree with our proposal to restrict the display of heated and other tobacco-related devices?

Agree

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

Agree

Please explain your answers.

BPRS supports requiring requested temporary displays of tobacco products to take place only from behind the sales counter, and extending the same approach to cigarette papers, heated and other tobacco-related devices, and herbal smoking products. Point-of-sale exposure matters. Before the UK tobacco display ban, noticing cigarette displays and greater brand awareness were associated with increased smoking susceptibility in young people. Following implementation, smoking susceptibility and brand recall fell (Ford et al., Tobacco Control, 2020;29:282–288). In England, the display ban also reduced children's reported exposure to cigarettes and coincided with fewer regular child smokers buying cigarettes from shops (Laverty et al., Tobacco Control, 2019;28:526–531). The same principle should apply to related products. Leaving cigarette papers, heated tobacco devices or herbal smoking products visible would retain a route for normalising and promoting smoking-related behaviour. Heated tobacco products expose users to toxicants and are not harmless (Simonavicius et al., Tobacco Control, 2019;28:582–594). Herbal smoking products also generate harmful combustion products despite being tobacco-free (Rahman et al., ACS Omega, 2022;7:45797–45809). We support limited requested displays for informed purchasing, but these should be brief, from behind the counter and restricted to the product requested. The 1.5 m² maximum should be treated as an upper limit, not a routine display size. Incidental display for restocking or maintenance should be kept to the minimum necessary.

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

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

Agree

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

Agree

Please explain your answers.

BPRS supports applying the same price-display restrictions to cigarette papers, tobacco-related devices, including heated tobacco devices, and herbal smoking products. Price is part of the retail marketing environment. The evidence is stronger for point-of-sale promotion overall than for price lists specifically, but the direction is clear. Exposure to tobacco displays and greater brand awareness have been associated with increased smoking susceptibility in young people, with reductions after display restrictions were introduced (Ford et al., Tobacco Control, 2020;29:282–288). UK research has also shown that tobacco companies adapt their promotional activity after display bans, including through retailer incentives and in-store positioning (Stead et al., Tobacco Control, 2018;27:414–419). The aim should therefore be to provide factual price information without allowing price boards, labels or images to become another form of promotion. We support a single plain text price list, with standardised font, size and content. Picture price lists should be available only on request to someone legally entitled to purchase the product, and images should show compliant packaging only. Shelf labels should remain within covered storage. The same rules should apply to electronic price displays. Promotional wording such as “special offer”, “best value”, multi-buy incentives or loyalty rewards should not be permitted within the price information.

Exemptions to display restrictions for tobacco products, cigarette papers, tobacco-related devices and herbal smoking products in England, Wales and Northern Ireland**Do you agree or disagree with our proposal to allow for the display of cigarette papers and their prices in relevant trade premises?**

Agree

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

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

Please explain your answers.

BPRS supports these exemptions for genuine trade-only premises, provided they are tightly defined and inaccessible to the public. The rationale is that the child-protection benefit of display restrictions comes from reducing public exposure to tobacco and related products. UK evidence shows that reducing point-of-sale visibility is associated with lower brand awareness and smoking susceptibility among young people (Ford et al., Tobacco Control, 2020;29:282–288), and with reduced reported exposure to cigarettes in shops (Laverty et al., Tobacco Control, 2019;28:526–531). Where premises are genuinely restricted to people working in the trade, the same concern is much less relevant. However, the exemption should not apply to mixed retail premises, public exhibitions, or businesses using nominal membership arrangements to admit ordinary consumers. Displays should not be visible from outside the premises, and the exemption should not remove any requirements on packaging, health warnings or product appearance. This needs clear enforcement because tobacco companies have previously adapted promotional activity in response to display restrictions (Stead et al., Tobacco Control, 2018;27:414–419).

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

Disagree

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?

Disagree

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

Disagree

Please explain your answers.

BPRS does not support display exemptions for specialist tobacconists simply because of the nature of the business. Specialist status does not guarantee that children cannot enter or see products. UK evidence shows that reducing point-of-sale visibility is associated with lower brand awareness and smoking susceptibility in young people (Ford et al., Tobacco Control, 2020;29:282–288). Customers can still receive advice and inspect products on request without maintaining open displays. If any exemption is retained, it should require strict age-restricted entry, no visibility from outside, and no access through adjoining public retail areas.

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

Agree

Please explain your answer.

BPRS supports removing the bulk tobacconist exemption and not extending it to other products. If premises are accessible to the public, including children, there is no good public health reason for allowing visible displays that would be prohibited elsewhere. UK evidence shows that reducing point-of-sale exposure is associated with lower brand awareness and smoking susceptibility in young people (Ford et al., Tobacco Control, 2020;29:282–288). We do not hold independent data on the number of affected businesses or implementation costs.

Requested temporary and incidental displays in Scotland

Retail display of tobacco products, smoking-related products, heated tobacco devices and herbal smoking products in Scotland

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

Do you agree or disagree with our proposal to restrict the display of heated tobacco devices?

Agree

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

Agree

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

If we expand the area of display, what size do you think it should be increased to?

a narrowly defined allowance sufficient to show one waterpipe only

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?

Don't know

Please explain your answers.

In adjusted analyses from the Scottish DISPLAY study, implementation was associated with lower perceived tobacco accessibility and less favourable attitudes towards smoking. These findings depended on adjustment, particularly for changing e-cigarette use, and should not be described as a simple fall in the unadjusted results (Kuipers et al., Tobacco Control, 2020;29:348-356). We support extending these protections to heated tobacco devices and herbal smoking products. Heated tobacco exposes users to nicotine and toxicants, although generally at lower levels than cigarettes (Simonavicius et al., Tobacco Control, 2019;28:582– 594). Herbal smoking products also generate harmful combustion products and should not be presented as benign alternatives (Rahman et al., ACS Omega, 2022;7:45797–45809). The 0.1 m² maximum should be retained wherever practicable. For waterpipes, we would select “Other” and favour a narrowly defined allowance sufficient to show one waterpipe only, rather than creating a larger general display area. Waterpipe smoking is associated with significant pulmonary and cardiovascular harm (Darawshy et al., European Respiratory Review, 2021;30:200374). We cannot be certain that the current statutory list captures every device now or in future. The definition should therefore be functional and updateable, rather than rely solely on a fixed list of named products.

Display of prices for heated tobacco devices and herbal smoking products in Scotland

Do you agree or disagree with our proposal to restrict the display of prices of heated tobacco devices?

Agree

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

Agree

Please explain your answers.

BPRS supports applying the same price-display restrictions to heated tobacco devices and herbal smoking products. Customers should be able to compare prices without encountering an advertisement. A plain text list, a picture list shown only on request, and labels inside covered storage should be sufficient. Scottish interviews documented retailer incentives and promotional activity continuing after tobacco display restrictions. That study concerns commercial behaviour, not the effect of price lists on children, but illustrates why alternative promotional routes need attention (Stead et al., Tobacco Control, 2018;27:414-419). Electronic lists should meet the same requirements as printed ones. Images should show products or packaging that meet the applicable standards, without promotional backgrounds or claims. Special-offer wording, loyalty incentives and multi-buy promotions should not be incorporated into the price information.

Exemptions to display regulations for tobacco products, smoking-related products, heated tobacco devices and herbal smoking products in Scotland

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

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

Please explain your answers.

BPRS supports these exemptions for genuine trade-only premises in Scotland, provided access is restricted to people working in the relevant trade and displays are not visible to the public. The main purpose of display restrictions is to reduce public exposure and the normalisation of tobacco and related products, particularly among children and young people. Scottish data show that point-of-sale

restrictions were followed by reductions in adolescents' perceived accessibility of tobacco and more negative attitudes to smoking (Kuipers et al., Tobacco Control, 2020;29:348– 356). That rationale is much less relevant in premises that are genuinely closed to the public. However, the exemption should be narrowly drawn. It should not apply to mixed retail premises, public-facing wholesale areas, exhibitions, or businesses using nominal trade membership to admit ordinary consumers. Any display must remain invisible from outside the premises. The exemption should concern display only and should not remove requirements on packaging, warnings, product appearance or traceability. Clear enforcement criteria will be important to prevent the exemption becoming a route around the wider restrictions.

Do you agree or disagree with our proposal to allow for the display of heated tobacco devices and prices inside specialist tobacconists in Scotland?

Disagree

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

Disagree

Please explain your answers.

PRRS supports a limited exemption for genuine trade-only premises, provided the public cannot enter and displays cannot be seen from outside. This is a practical distinction between business-to-business activity and public promotion. UK research found that reductions in brand awareness and smoking susceptibility followed tobacco display restrictions, supporting the aim of reducing children's routine exposure (Ford et al., Tobacco Control, 2020;29:282-288). The exemption should not apply to mixed shops, public-facing wholesale counters or nominal membership schemes admitting ordinary consumers. Access should be checked and the conditions enforceable. Only display should be exempted. Requirements on packaging, product appearance, warnings and traceability should continue to apply.

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

Please explain your answer.

BPRS supports removing the bulk tobacconist exemption and not extending it to other products in scope. If premises are accessible to the public, including children and young people, there is no good reason for allowing visible displays that would be prohibited in other retail settings. UK evidence shows that reducing point-of-sale visibility is associated with lower brand awareness and smoking susceptibility among young people (Ford et al., Tobacco Control, 2020;29:282–288). The same principle should apply in duty-free and other bulk-sales settings. Genuine trade-only activity can be dealt with through the separate trade-premises exemption. We do not hold independent data on the number of affected businesses or the costs of removing displays. These should be assessed separately from the public health case for removing the exemption.

Retail display - vaping and nicotine products

Would you like to answer these questions?

Yes

Definition of vaping products

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?

Agree

Do you agree or disagree with our proposal to restrict the display of nicotine products?

Agree

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

Please explain your answers.

BPRS supports all three proposals. Products should be out of sight, with brief requested displays behind the counter after checking the customer's eligibility. An audit of 133 shops in Bristol and Cambridge found highly visible vape displays in 96% of stores (Brocklebank et al., Tobacco Control, 2022;31:e201-e206). This demonstrates exposure in those settings, not the effect of a national display ban. Direct experimental evidence is mixed. A UK study found no significant main-analysis effect on smoking or vaping susceptibility. Smoking-related signals appeared in planned subgroups, and greater visibility reduced perceived harm of smoking, but not vaping (Blackwell et al., Tobacco Control, 2023;32:e220-e227). These findings support evaluation and caution about promotional exposure, not a claim that display restrictions have already been proved to reduce youth vaping. The rules should cover nicotine-free vapes, components, refills and non-medicinal nicotine products. Separate covered compartments should prevent a request to see a vape exposing tobacco products. We favour the smaller Scottish allowance, while recognising that no cited study establishes the optimal area. Adult smokers should retain access to factual information and cessation support. The effects on both youth use and adult quitting should be monitored.

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

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

Please explain your answers.

BPRS supports both proposals. Price lists should provide factual information without becoming advertisements. A UK packaging audit found inconsistent descriptions of nicotine content, supporting standardised numerical information (Ford et al., Nicotine & Tobacco Research, 2025;27:152-156). Liquids should be described in mg/ml, with volume also given; pouches should show mg per pouch. Informal strength scales should not substitute for these figures. Separate lists for tobacco and for vaping or nicotine products are sensible. They should not imply identical risks or that every nicotine product is an established cessation aid. A UK trial supports nicotine vaping for adult smoking cessation when accompanied by behavioural support (Hajek et al., New England Journal of Medicine, 2019;380:629-637). Lists should use consistent type and permitted descriptors, without promotional claims or incentives. Picture lists should be available only on request to eligible customers. The same requirements should apply to electronic displays.

Exemptions to display restrictions of vaping and nicotine products across the UK

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

Agree

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

Agree

Please explain your answers.

BPRS supports a limited exemption for genuine trade-only premises, provided they are inaccessible to the public and displays are not visible from outside. The concern is routine public exposure. An English audit documented highly visible vaping displays in shops in Bristol and Cambridge, although it did not measure their effects on behaviour (Brocklebank et al., Tobacco Control, 2022;31:e201-e206). That setting differs from controlled business-to-business premises. The exemption should not extend to mixed retail shops, public exhibitions or nominal trade-membership schemes admitting ordinary consumers. Access and visibility conditions should be enforceable. Packaging, appearance, warnings and traceability requirements should still apply. No additional public-facing retail exemption is needed.

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?

Disagree

Please explain your answer.

BPRS does not support a general exemption for visible pharmacy displays. A locked transparent cabinet limits handling but leaves products visible to children accompanying adults. Pharmacists should be able to discuss vaping and show an appropriate product during an individual cessation consultation. In a UK trial, nicotine e-cigarettes with behavioural support improved one-year quit rates compared with nicotine replacement therapy (Hajek et al., New England Journal of Medicine, 2019;380:629-637). This evidence concerns cessation treatment, not the effectiveness of public product displays. We are particularly cautious about extending an exemption to every non-medicinal nicotine product. Evidence for nicotine pouches as cessation aids remains limited and uncertain (Hartmann-Boyce et al., Cochrane Database of Systematic Reviews, 2025;10:CD016220). Neutral information about cessation services should remain visible. Any exemption should be confined to individual consultations, without visibility from the general retail area or promotional branding. Licensed nicotine replacement medicines are outside this consultation and should remain available under medicines regulation.

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

Please explain your answer.

BPRS supports a six-month implementation period. It is proportionate, allows retailers time to adapt, and avoids unnecessary delay in reducing children's exposure to prominently displayed tobacco, vaping and nicotine products.

Consultation stage impact assessments

Would you like to answer the questions in this section?

Yes

Impact assessment: Standardised packaging and pack inserts for tobacco products (excluding cigarettes and hand rolling tobacco), heated tobacco devices, herbal smoking products and cigarette papers

Provide any evidence to inform our estimates in the impact assessment of the benefits of the proposed policy.

The strongest evidence supports reduced appeal and more noticeable warnings, rather than a precise reduction in use of every product covered here. UK studies of standardised cigarette packaging found more prominent warnings and reduced appeal, while longer-term behavioural effects remained uncertain (Moodie et al., Risk Management and Healthcare Policy, 2021;14:1465-1480). Pictorial warnings outperform text-only warnings for attention, attitudes and intentions to avoid or stop smoking. The cited meta-analysis identified limited evidence on actual smoking behaviour (Noar et al., Tobacco Control, 2016;25:341-354). Canadian panel studies associated reading inserts with later quit attempts, including attempts lasting at least 30 days, not established long-term abstinence (Thrasher et al., Nicotine & Tobacco Research, 2015;17:870-875; Thrasher et al., Preventive Medicine, 2016;88:59-65). Potential benefits for children include less household smoke exposure if adults stop smoking. Secondhand smoke is associated with childhood asthma and wheeze (He et al., Pediatric Pulmonology, 2020;55:2518-2531). These benefits should be assessed without assuming identical effects across products or double-counting overlapping outcomes.

Provide any evidence to inform our estimates in the impact assessment of the costs of the proposed policy.

BPRS does not hold independent data on profit margins, repackaging costs or retailer conversion costs. Costs should be checked against normal packaging replacement cycles, with one-off changes separated from recurring expenditure. Common warning artwork and coordinated specifications may reduce duplicated work. Reduced sales are not, by themselves, a net social cost. The assessment should distinguish compliance resources, changes in producer surplus and tax transfers, and account for spending redirected elsewhere. Commercial estimates should be independently checked. We have no basis for assigning a precise cost to the changes across all product formats.

Specify any stakeholders that may be impacted by the proposed policy and/or costs and benefits that we have not identified in the impact assessment.

Children and young people should be considered explicitly, particularly those living with tobacco users. Benefits include reduced exposure to smoke, reduced normalisation of tobacco use and potentially lower future initiation. The association between secondhand smoke and childhood asthma and wheeze is well established (He et al., Pediatric Pulmonology, 2020;55:2518– 2531). Other relevant stakeholders include pregnant women, families, schools, paediatric and primary care services, local stop-smoking services and Trading Standards. The policy may have different effects across socioeconomic groups because tobacco use is socially patterned. The assessment should therefore consider whether benefits are greater in communities with higher tobacco prevalence, while ensuring that cessation services are accessible in those same areas. Users of shisha, smokeless tobacco and heated tobacco also need specific consideration, as risk perceptions and patterns of use may differ from cigarette smokers.

Outline any potential unintended consequences of the proposed policy that we have not identified in the impact assessment.

Possible unintended consequences include switching between tobacco products rather than stopping altogether, movement towards cheaper products, and manufacturers transferring branding to accessories, sleeves or other parts of the product not covered by the regulations. Warnings should also

be product-specific. Using identical imagery or wording across products with different risk profiles could cause confusion or imply that all products carry identical harms. For heated tobacco, users may interpret reduced-risk messaging as meaning harmless. Heated tobacco still exposes users to nicotine and toxicants, although generally at lower levels than cigarettes (Simonavicius et al., Tobacco Control, 2019;28:582– 594). The policy should therefore be evaluated for product switching, dual use and illicit supply, not simply for reductions in one product category. Manufacturers should also be prevented from using packaging inserts, accessories or digital material to recreate branding removed from the pack.

Provide any other comments to inform our assumptions or analysis in the impact assessment.

Evidence from cigarettes is relevant but should not be transferred unchanged to cigars, smokeless tobacco, heated tobacco or herbal products. The Canadian insert studies measured self-reported quit attempts, including attempts lasting at least 30 days. Their samples overlap, so they should not be treated as two independent demonstrations of sustained cessation (Thrasher et al., Nicotine & Tobacco Research, 2015;17:870-875; Thrasher et al., Preventive Medicine, 2016;88:59-65). The model should distinguish attempts from sustained abstinence and include relapse assumptions. Packaging, warnings, inserts and display restrictions may affect the same people, so neither benefits nor implementation costs should simply be added together. Use transparent assumptions and sensitivity analyses. Benefits for children should remain explicit where monetisation is too uncertain, alongside a plan to measure youth initiation and household smoke exposure after implementation.

Impact assessment: Restricting the appearance of vapes and heated tobacco products

Provide any evidence to inform our estimates in the impact assessment of the benefits of the proposed policy.

In a randomised experiment involving 15,259 people aged 16-29, standardised white devices increased the proportion reporting no interest in trying them from 62.8% to 67.1%. Interest also fell among participants who smoked (Tattan-Birch et al., Tobacco Control, 2026;35:489-497; doi:10.1136/tc-2024-059210). This supports an effect on stated appeal, not a directly measured reduction in youth initiation. The age range also extends well beyond childhood. Gomes and colleagues separately found that device skins appealed differently to subgroups; their quantified standardisation effect concerned outer packaging (Gomes et al., Public Health, 2024;230:223-230). The RCPCH review identified associations between youth vaping and respiratory symptoms, providing a reason to prevent uptake, but not a causal estimate of illnesses avoided by redesign (Oyella et al., Archives of Disease in Childhood, 2026; published online 19 August; doi:10.1136/archdischild-2025-330125). Benefits should be modelled with uncertainty and assessed alongside possible effects on adult smoking cessation.

Provide any evidence to inform our estimates in the impact assessment of the costs of the proposed policy.

BPRS does not hold independent manufacturing or redesign cost data. Separate changes to printing and finish from those requiring new moulds, components, electronics or software testing. Removing lights, for example, may not be merely cosmetic. Account for normal replacement cycles without assuming that every required change would have happened anyway. Compliance resources, lost profits and health consequences should be reported separately. Include ongoing enforcement and software-update surveillance, while avoiding duplication with packaging-related costs.

Specify any stakeholders that may be impacted by the proposed policy and/or costs and benefits that we have not identified in the impact assessment.

Children and young people are the main group likely to benefit and should be considered explicitly, including those who are currently vaping and may already be nicotine-dependent. Other relevant stakeholders include parents, schools, paediatric services, Trading Standards, importers, retailers, waste services and smoking-cessation services. Adult smokers who use vaping to quit need separate consideration. Vaping can be an effective cessation aid when combined with behavioural support (Hajek et al., N Engl J Med, 2019;380:629–637). Measures that reduce youth appeal should therefore be

designed and evaluated carefully so they do not unnecessarily reduce access or acceptability for adult smokers seeking to stop smoking.

Outline any potential unintended consequences of the proposed policy that we have not identified in the impact assessment.

Manufacturers may shift decorative features into replaceable covers, pods, mouthpieces, accessories, apps or software updates. The regulations should therefore cover the device as supplied, its visible components and later software changes. There is also a risk that stronger appearance restrictions could reduce the attractiveness of vapes to adult smokers who might otherwise switch from cigarettes. The Tattan-Birch study found that standardisation also reduced interest among some young adults who smoked (Tattan-Birch et al., Tobacco Control, 2026;35:489–497). Other potential consequences include movement towards illicit products and unnecessary disposal of existing devices. These should be monitored after implementation rather than assumed to be either negligible or inevitable.

Provide any other comments to inform our assumptions or analysis in the impact assessment.

Use the final published versions of relevant studies and distinguish genuinely new evidence from studies already cited. The Taylor papers should not all be described as published after the October 2025 evidence cut-off; the vape-pod study was available online in September 2025. There is also an apparent unit error in paragraph 238, on page 50 of the impact assessment. It calls £378 weekly expenditure on reusable vapes, whereas Table 5 and paragraph 113 on page 29 give £7.28 weekly and approximately £378 annually. Please correct the wording and confirm that the calculations use the annual figure. The published text alone does not establish a calculation error. Paragraph 239 also contains a broken cross-reference. Evaluate packaging alongside device and display measures, allowing for overlap in their effects and costs. Outcomes should include youth initiation and dependence, adult cessation, switching between products, illicit purchasing and inequalities.

Impact assessment: Standardising packaging for vaping products and nicotine products

Provide any evidence to inform our estimates in the impact assessment of the benefits of the proposed policy.

These are cross-cutting comments relevant to the assessments for England, Scotland, Wales and Northern Ireland, not an estimate of a common effect size. UK studies found that lower brand awareness and smoking susceptibility followed tobacco display restrictions (Ford et al., Tobacco Control, 2020;29:282-288). English data also showed reduced reported shop exposure and purchasing, but no clear increase in difficulty obtaining cigarettes among remaining purchasers (Lavery et al., Tobacco Control, 2019;28:526-531). Scottish findings on perceived access and smoking attitudes depended on adjustment, particularly for changing e-cigarette use (Kuipers et al., Tobacco Control, 2020;29:348-356). Evidence for vape displays is less conclusive. A UK experiment found no significant main-analysis effect on smoking or vaping susceptibility; smoking-related signals appeared in planned subgroups, and greater visibility reduced perceived harm of smoking (Blackwell et al., Tobacco Control, 2023;32:e220-e227). Use this evidence cautiously when modelling vaping or nicotine pouches. Assess exposure and initiation as well as purchases, with separate baselines and implementation costs for each nation.

Provide any evidence to inform our estimates in the impact assessment of the costs of the proposed policy.

These comments apply across all four nations. BPRS has no independent retailer margin or refitting data. Distinguish low-cost screening or storage changes from complete fixture replacement. Measure transaction and restocking costs after staff have adapted, and avoid double-counting work needed for other regulations. The assessment should also provide for sustained Trading Standards inspection, test purchasing and action against online or illicit supply. Initial guidance alone will not fund continuing compliance. Shared inspection costs should be allocated transparently across the measures being enforced.

Specify any stakeholders that may be impacted by the proposed policy and/or costs and benefits that we have not identified in the impact assessment.

Children and young people should be considered explicitly, including never-users, current vapers and those already nicotine-dependent. Parents, schools, paediatric services, poison services, Trading Standards and cessation services are also relevant. Young children may benefit from safer, child-resistant packaging. Nicotine liquid exposures can cause serious toxicity (Kamboj et al., *Pediatrics*, 2016;137:e20160041). The impact on inequalities also warrants attention, particularly if nicotine-product use and retail exposure are concentrated in more disadvantaged communities.

Outline any potential unintended consequences of the proposed policy that we have not identified in the impact assessment.

The main risks are product substitution and regulatory avoidance. Manufacturers may shift promotional cues into brand names, flavour codes, inserts, sleeves or separately sold accessories. Consumers may also move between vapes, nicotine pouches and cigarettes, so a fall in one category should not automatically be interpreted as reduced nicotine dependence. There is also a risk that plain packaging could be mistaken for medical endorsement, particularly if white packaging resembles pharmaceutical products. Warnings and public communication should therefore remain clear that these are consumer products, not harmless or medically licensed products. At the same time, measures should not unintentionally deter adult smokers from switching away from cigarettes. The evidence base for vaping as a cessation aid is substantially stronger than for nicotine pouches (Hajek et al., *N Engl J Med*, 2019;380:629–637; Hartmann-Boyce et al., *Cochrane Database Syst Rev*, 2025;10:CD016220).

Provide any other comments to inform our assumptions or analysis in the impact assessment.

These are cross-cutting comments for all four nations. Tobacco evidence should not be used as an unqualified effect estimate for vaping or nicotine products. The four nations should use comparable outcomes but retain their own retail baselines, enforcement costs and legal settings. Differences in permitted display area offer an opportunity for evaluation, not proof that one limit is already optimal. BPRS's January 2025 parliamentary evidence called for ring-fenced enforcement resources, coordination and regular reporting. These should be reflected in the implementation and evaluation budgets. Begin measurement before implementation and report compliance, youth exposure and initiation, dependence, adult cessation, product switching, illicit purchasing and inequalities. Include support needs among young people already dependent on nicotine. Unmonetised child-health benefits should remain explicit, rather than being treated as zero.

Impact assessments on retail display

Provide any evidence to inform our estimates in the impact assessments of the benefits of the proposed policy.

Applies to all four impact assessments: England, Scotland, Wales and Northern Ireland. There is good UK evidence that removing tobacco from open display reduces exposure and changes attitudes in young people. Following the UK display bans, brand awareness and smoking susceptibility fell among never-smoking adolescents (Ford et al., *Tobacco Control*, 2020;29:282–288). In England, children reported less exposure to cigarettes and fewer regular child smokers reported buying cigarettes from shops after the ban (Laverty et al., *Tobacco Control*, 2019;28:526–531). Scottish data similarly showed reductions in perceived tobacco accessibility and more negative attitudes to smoking after point-of-sale restrictions (Kuipers et al., *Tobacco Control*, 2020;29:348–356). For vapes, the evidence is less mature but retail displays are highly visible in England, and experimental work suggests display exposure can influence smoking and vaping-related attitudes in adolescents (Brocklebank et al., *Tobacco Control*, 2022;31:e201–e206; Blackwell et al., *Tobacco Control*, 2023;32:e220–e227). Benefits should therefore include reduced routine exposure and normalisation, particularly for children, not just measurable reductions in purchases.

Provide any evidence to inform our estimates in the impact assessments of the costs of the proposed policy.

Applies to all four impact assessments. BPRS does not hold independent data on retailer profit margins or refitting costs. The assessments should distinguish simple measures, such as opaque covers or reorganising existing storage, from full fixture replacement. They should also separate one-off compliance costs from recurring costs and avoid double-counting changes required by other packaging or display regulations.

Specify any stakeholders that may be impacted by the proposed policy and/or costs and benefits that we have not identified in the impact assessments.

Applies to England, Scotland, Wales and Northern Ireland. Children and young people should be considered as a distinct stakeholder group, including never-users, current vapers and those already nicotine-dependent. Parents, schools, paediatric services, Trading Standards and smoking-cessation services are also affected. There may be important distributional effects. Retail exposure and tobacco use are socially patterned, so benefits may be greater in more deprived communities. Scottish research found greater tobacco display exposure in some deprived settings before restrictions were introduced (Stead et al., Public Health, 2016;136:48–56). Adult smokers using vapes to quit should be considered separately from children and never-smokers. Restricting unsolicited display should not prevent access to factual information or cessation support.

Outline any potential unintended consequences of the proposed policy that we have not identified in the impact assessments.

Applies to all four impact assessments. The main risk is displacement rather than disappearance of promotion. Retailers or manufacturers may move marketing towards windows, digital screens, price promotions, online channels or staff recommendations. Evidence from Scotland shows that tobacco companies adapted after display bans by using retailer incentives and other promotional strategies (Stead et al., Tobacco Control, 2018;27:414–419). There is also a risk that shared storage units could expose tobacco when a customer asks to see a vape, which supports the proposal for separate covered compartments. For vaping, display restrictions should be monitored for any effect on adult smoking cessation, particularly if products become harder to identify or access. At the same time, exemptions should not create new visible promotional spaces, including in pharmacies. Illicit and online sales should be monitored alongside compliance, rather than assuming retail restrictions simply reduce overall demand.

Provide any other comments to inform our assumptions or analysis in the impact assessments.

Applies to all four impact assessments. The evidence for tobacco display bans is considerably stronger than for vape and nicotine-product display restrictions. The latter should therefore be modelled more cautiously and with sensitivity analyses rather than borrowing tobacco effect sizes directly. The four nations should use comparable outcome measures so the policy can be evaluated across the UK. We would recommend monitoring youth exposure to displays, initiation, regular use, dependence, adult smoking cessation, product switching, illicit purchasing and inequalities. Where benefits to children cannot be monetised reliably, they should still be made explicit in the final appraisal rather than treated as having no value.

File upload

If you would like to upload a document to support your submission, please do so [here](#).

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Option to review your answers

Would you like to review your answers before submitting them?

Yes