



FOUNDATION FOR A  
SMOKE-FREE WORLD

# MAPPING OF HARM REDUCTION PRODUCTS IN PAKISTAN

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## Acronyms

AKU	Agha Khan University
BAT	British American Tobacco
CTC-Pak	Coalition for Tobacco Control-Pakistan
CSOs	Civil Society Organizations
CNICs	Computer National Identity Cards
COP	Conference of Parties
DRAP	Drug Regulatory Authority of Pakistan
EU	European Union
ENDS	Electronic Nicotine Delivery System
FCV	Flue Cured Virginia
FED	Federal Excise Duty
FCTC	Framework Convention on Tobacco control
FSFW	Foundation for a Smoke Free World
FDA	Food and Drug Administration
HRPs	Harm Reduction Products
MNHSRC	The Ministry of National Health Services, Regulation and Coordination
PTC	Pakistan Tobacco Control
PTB	Pakistan Tobacco Board
PCSIR	Pakistan Council of Scientific and Industrial Research
PCT	Pakistan Customs Tariff
PMI	Philip Morris International
PMLN	Pakistan Muslim League Nawaz
PMA	Pakistan Medical Association
PPRA	Pakistan Procurement Regulatory Authority
PANAH	Pakistan National Heart Association
PVC	Pakistan Vaping Community
PHE	Public Health England
SRO	Statutory Regulatory Orders
TCC	Tobacco Control Cell

## Executive Summary

The use of electronic nicotine delivery systems (ENDS) is a nascent phenomenon in Pakistan and seems to be hiding in plain sight. The people and business operators of harm reduction products (HRPs) are keeping a low key to avoid regulations and/or policies that could affect their business concerns. There are no clear or defined regulations for the use of HRPs including imports, manufacturing or product contents. However, the e-cigarettes and other HRPs are legally imported as consumer goods, with tax duties imposed on them.

Though e-cigarettes are imported as consumer products and the e-liquids as essential oil, the budget 2017-18 speech of the finance minister termed e-cigarettes in Pakistan as “not properly classified and subject to only 3%” customs duty. He added that “keeping in view the harmful effect on health, it is proposed that electric cigarettes may be properly classified with 20% customs duty.”

The stakeholders working on tobacco control in Pakistan, including the government, health professionals and civil society, are following the position of WHO which like other global stakeholders are taking the precautionary approach. One of the reasons cited is the perception that the vaping is another ploy of the big tobacco to sustain the conventional smoking as propagated by WHO and other like-minded organizations. This approach, in our opinion, is contradictory to the fact that despite the national tobacco control laws adopted in 2003, there are still 24 million tobacco users in Pakistan.

The argument of HRPs offering a solution to decreasing the burden of disease related to tobacco use resonates widely with public including tobacco control advocates, the Tobacco Control Cell in the federal ministry of health and other civil society stakeholders, who are ready to listen to evidence on HRPs as a harm reduction strategy.

Despite this willingness, the availability of limited data for HRPs and their use is a barrier. According to some estimates, the number of HRP users in Pakistan is somewhere between 30000 and 50000 with anecdotal evidence of dual use of conventional smoking and vaping.

Euromonitor in August 2018 reported 1.8 million adult HRP users in Pakistan. The number did not correlate with the situation on the ground and when we approached Euromonitor about the data source, they admitted that it was mistakenly reported. They opined that the number of HRPs users in Pakistan is negligible.

From the data that is available and our public interaction, one can conclude that vaping is currently an urban, upper class phenomenon and limited to metropolitan cities.

Online purchases is the main mode of purchasing e-cigarettes in Pakistan. Almost all the vendors have websites through which they advertise products and provide home delivery service. However there has been a slow but steady increase in the number of e-cigarette outlets in Pakistan. Most of these outlets are in upscale localities. Though nobody has exact figures about the number of e-cigarette shops in Pakistan, it is estimated that the number is very low. Artisan Vapor, an American retail store, has 16 outlets in Pakistan.

The prices<sup>1</sup> of vaping products are higher than the conventional cigarettes. The most expensive duty paid cigarette packet in Pakistan costs a little more than a dollar while the price of an E-Cig kit starts from 24 dollars and goes up to 162 dollars. This is mainly because the e-cigarettes and flavors are imported. The kits are imported from China and the flavors from the US, UK and Malaysia.

The vaping sector in Pakistan is already facing the threat of clones/fake products. Downtown markets in Karachi and Rawalpindi are becoming hub of clone/fake vaping products. These are relatively inexpensive but still cost more than the cigarette pack.

The shift to vaping from conventional smoking is an individual decision. Almost no medical consultation is involved as doctors are either not aware of or currently not recommending vaping as a harm reduction and smoking cessation tool. The motivation of switching to vaping is health concerns.

The vendors and vapers keep abreast with research on e-cigarettes being done internationally with some of them closely following the legislative and regulatory developments in the UK.

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<sup>1</sup> For the list of vaping prices, see Annex-III

The print and electronic media in Pakistan generally portray vaping as a harmful activity, saying it is another form of *sheesha* (water pipe). This is something vendors of e-cigarettes want to avoid. There is need for sensitizing print and electronic media on e-cigarettes, especially the Public Health England stance. There is also need for generating debate on the use of e-cigarettes and the conventional smoking.

The vendors and HRP users want the federal and provincial governments to introduce regulation on the import, sale and use of e-cigarettes, through a consultative process, taking the interests of smokers in consideration and central to any legislation.

The research on HRPs in Pakistan remains patchy with three studies undertaken in the last two years. The geographic reach of these studies was limited to one city in the province of Sindh. The focus of the studies is assessing awareness, perception and use of e-cigarettes. No medical research with regards to e-cigarette or HRPs has been carried out in Pakistan.

## Recommendations

Based on the findings of this report, we recommend the following:

1. There is an urgent need to address the lack of credible data on HRPs use in Pakistan as this gap is being filled by tobacco control rhetoric with limited knowledge about the perceptions of smokers about HRP usage.

*ACTION: A detailed study on the perceptions, attitudes and factors impacting decisions of smokers towards use of harm reduction products including e-cigs in a country not familiar with Harm Reduction to strategize the next steps for introducing the concept of harm reduction in Pakistan.*

2. The medical community is open to the possibility of using harm reduction as a tool to improve lung health, and can prove to be an important partner in reducing the incidence of smoking in the country.

*ACTION: A Pilot study for introduction of harm reduction in cessation programs run by National TB program to give patients of TB who smoke options to either quit by using HRPs can form an important initial step to address the co-morbidities.*

3. Tobacco control community in Pakistan is aggressively calling for declaring HRPs - e-cigarettes - tobacco products based on limited understanding of the products.

*ACTION: In partnership with partners, introduce a product classification for safer nicotine products and to document the pros and cons of such an approach.*

4. Smokers who have given up combustible smoking for the last two years and switched to HRPs report improved health as a major benefit of shifting to vaping.

*ACTION: To document these behaviors, a qualitative study on smokers who switched exclusively to e-cigarettes across Pakistan needs to be undertaken.*

5. Access to HRPs in Pakistan is limited to upper, middle class and there are factors which limit this access revolving around price, quality of products, accurate and reliable information about the products.

*ACTION: Undertake a study to evaluate and document the barriers to uptake of HRPs in Pakistan.*

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<sup>2</sup> A Sheesha is a water pipe, consisting of a head (which is filled with moist tobacco), with a central stem leading to a water bowl at the bottom and a hose with a mouthpiece on the end. Moist tobacco in the head is heated by lighting some charcoal held above it (on a piece of foil with holes poked in it or a metallic mesh). The intention is to heat the tobacco without burning it, but this doesn't always work out as planned. The smoke is then sucked through the water and out of the hose before the user inhales.

## Introduction

This scoping study reviews the status of HRP in Pakistan for their use as harm reduction and smoking cessation tools. The study has been divided into two parts - literature review and consultation with stakeholders, including the tobacco control advocates. A total of 21 interviews were held with the stakeholders in Islamabad and Karachi. Compared to huge body of research work on combustible smoking, the preliminary assessment found lack of research literature on HRP in Pakistan. The research and non-research material, mainly in the form of new stories, and the consultation with the stakeholders, have been synthesized on the HRP use in Pakistan.

Though there are no exact figures available about the number of HRP users in Pakistan, their number is negligible compared to cigarette smokers. The HRP users were identified and interviewed in Karachi and Islamabad. The report provides a contrast between the heavy tobacco use, including combustible smoking, and the emerging use of HRP in Pakistan. It also highlights the stances and understanding of the tobacco control community on the use of HRP as a smoking cessation tool.

It analyses the factors of acceptance, availability and prices of HRP. It also reviews the socio-economic backgrounds of the cigarette smokers and the HRP users. Based on the findings, the report identifies possible opportunities for future work on HRP in Pakistan.

## Methodology

For this qualitative study, the snowballing technique has been used to reach the respondents<sup>3</sup> - especially vendors<sup>4</sup> and HRP users in Karachi and Islamabad. The lack of background research<sup>5</sup> on HRP and the reactance to discuss harm reduction in the context of tobacco use necessitated the use of snowballing technique to meet and interview vendors and HRP users. Semi-structured interviews with the respondents were conducted. The recorded interviews were transcribed. The study has been divided into three chapters. The first chapter gives an overview of tobacco use in Pakistan, including the main stakeholders. The second chapter encapsulates the evolving vaping sector as HRP in Pakistan. The third chapter gives the views of the tobacco control advocates about HRP as an alternative to conventional smoking and if they are ready to include vaping in their tobacco control efforts for harm reduction and smoking cessation.

## Limitations

As this is a qualitative study based on the literature review and interviews with the HRP users, the findings are broad-based which need to be probed further.

E-cigarette vendors were generally reluctant to talk about the use of e-cigarettes as they feared their businesses' legality was being questioned. As the use of ENDS is a new phenomenon in Pakistan, exact figures are not available. HRP users were also reluctant to talk about their use of e-cigarettes.

Some of the tobacco control advocates questioned the role of Foundation for Smoke-Free World (FSFW). WHO representative refused to meet and discuss HRP in Pakistan. He maintained that WHO does not collaborate with any research backed by the tobacco industry.

<sup>3</sup> For the complete list of interviews for this study, please see Annex-I

<sup>4</sup> For the list of vendors in Pakistan, please see Annex-II

<sup>5</sup> Only three survey studies on the knowledge and use of e-cigarettes in Pakistan has been conducted.

## 1. Tobacco use in Pakistan

This section gives an overview of the tobacco use, including smoking, and the tobacco crop in Pakistan. It also briefly discusses the taxation on cigarettes in Pakistan and the legislation to control tobacco use in Pakistan.

### 1.1 A Country with a Heavy Burden of Tobacco Use

Pakistan is one of the 15 countries with a heavy burden of tobacco-related ill-health, according to WHO. The country has more than 23.9 million adults (31.8% of men, 5.8% of women) using various types of tobacco, including smoking and smokeless<sup>6</sup>. Of them, 15.6 million adults (22.2% of men, 2.1% of women) are current smokers and 3.7 million adult smoke sheesha<sup>7</sup> - a water pipe consisting of a head (which is filled with moist tobacco), with a central stem leading to a water bowl at the bottom and a hose with a mouthpiece on the end. The number of adult tobacco smokers have increased 2% in 2017 to reach 24.8 million - equivalent to 21% of the total adult population<sup>8</sup>. Extremely low cost of cigarettes is a key reason for the high rate of smoking prevalence in Pakistan<sup>9</sup>. Cigarette prices in Pakistan are among the lowest in the world.<sup>10</sup> According to another estimate, 82 billion cigarettes are consumed every year in Pakistan.<sup>11</sup> The production of duty-paid cigarettes witnessed a year-on-year 72% increase in 2017-18.<sup>12</sup> Secondhand smoke is a major issue in Pakistan as 16.8 million adults who work in indoors are exposed to tobacco smoke at the workplace<sup>13</sup>. In homes, 56.3 million adults are exposed to tobacco smoke at least once a month.

### 1.2 Tobacco Production

Pakistan is one of the top countries producing tobacco. Tobacco crop is planted over more than 50,000 hectares producing about 100,000 tonnes of tobacco leaves.<sup>14</sup> Tobacco is the only crop grown in Pakistan with an average yield of 2097 kgs/hectares, which is well above (20%) the world average yield of 1,752 kgs/hectare.<sup>15</sup> FCV is the main source of livelihood of tobacco farmers, which also contributes considerably to the government treasury. Known as the cash crop, around Rs2334.28 million (US\$ 24.571 million) worth of tobacco and cigarettes were exported by Pakistan during 2010-11.<sup>16</sup> More than 80,000 people are employed at farm level while 50000 have jobs in cigarette factories with one million marketing tobacco and its products.<sup>17</sup>

Khyber Pakhtunkhwa is the major tobacco-producing province of Pakistan. Of the total area under tobacco, almost 63% is cultivated in Khyber Pakhtunkhwa - its' share is 77% of the total tobacco produced in Pakistan. In Khyber Pakhtunkhwa, tobacco crop is grown in Swabi, Mardan, Charsadda, Mansehra, Buner, Malakand and Nowshehra districts, while in Punjab, it is grown in almost all districts except hilly areas like Rawalpindi, Islamabad and Chakwal<sup>18</sup>. Nearly all of the country's FCV and White Patta tobacco is produced in Khyber Pakhtunkhwa alone.

The cigarette market in Pakistan is almost entirely controlled by Pakistan Tobacco Pakistan (PTC), a subsidiary of British American Tobacco (BAT), and Philip Morris Pakistan<sup>19</sup>.

Tobacco growing and marketing is controlled by the Pakistani government through Pakistan Tobacco Board (PTB), created in 1968. The PTB determines how much tobacco is needed by tobacco product

<sup>6</sup> GATS 2014

<sup>7</sup> Ibid

<sup>8</sup> Smokeless Tobacco and Vapour Products in Pakistan, August 2018, Euromonitor

<sup>9</sup> Ibid

<sup>10</sup> Burki, Shahid Javed et al. (2013). The Economics of Tobacco and Tobacco Taxation in Pakistan, International Union Against Tuberculosis and Lung Disease (The Union)

<sup>11</sup> Cevik, Serhan, 2016. Smoke Screen: Estimating the Tax Pass Through to Cigarettes in Pakistan. International Monetary Fund.

<sup>12</sup> Pakistan Bureau of Statistics, Computation of Quantum Index Numbers of Large Scale Manufacturing, [available at [http://www.pbs.gov.pk/sites/default/files//industry\\_mining\\_and\\_energy/qim/2018/QIM%20Detail%20for%20June%2018.pdf](http://www.pbs.gov.pk/sites/default/files//industry_mining_and_energy/qim/2018/QIM%20Detail%20for%20June%2018.pdf)

<sup>13</sup> GATS 2014

<sup>14</sup> Ali, Sajid, Altaf, Quratulain, Farooq, Umar. (2014). Average Response of Flue Cured Virginia Tobacco in Khyber Pakhtunkhwa, Pakistan Journal of Agricultural Research.

<sup>15</sup> Ibid

<sup>16</sup> Ibid

<sup>17</sup> Ibid

<sup>18</sup> Ibid

<sup>19</sup> Burki, Shahid Javed et al. (2013). The Economics of Tobacco and Tobacco Taxation in Pakistan, International Union Against Tuberculosis and Lung Disease (The Union)

manufacturers and what farmers' average costs are for growing tobacco, and uses this information to set prices for tobacco leaf and quotas for tobacco growing<sup>20</sup>.

### 1.3 Taxation

Tobacco is a major source of revenue for Pakistan. The country collected Rs88 billion from tax on cigarettes in 2017-18, down from Rs111 billion in 2015-16.<sup>21</sup>

In 2013 Pakistan modified its tobacco excise tax system, with a two-tiered specific tax for cigarettes. However apart from setting tax rates for locally manufactured premium and mid-priced cigarette brands at up to 75% and 57%, a third tax tier to a minimum rate of 27% was announced in 2017-18 budget.<sup>22</sup> This third tier has been seen as benefitting “licensed cigarettes players that had been struggling earlier due to high taxes” as it also “reduced the price gap between locally manufactured brands from Pakistan Tobacco Co Ltd and Philip Morris (Pakistan) Ltd and cheaper illicit brands such as Kisan.”<sup>23</sup> The new government of Pakistan Tehreek-i-Insaf did not abolish the third tier but increased the tax by 46% - a measure cautiously welcomed by the tobacco control stakeholders.<sup>24</sup>

However, the tobacco control civil society maintains the introduction of third-tier witnessed increase in gross turnovers/sales volume of PTC and PMPL. “Sales volume of PTC picked up 23% in 3rd quarter of year 2017 as compared to 2nd quarter. The sale volumes of PMPL also rose during the third quarter of 2017 which are reflected in a Profit Before Tax of Rs. 786 million as compared to Loss Before Tax of Rs. 881 million during SPLY.”<sup>25</sup> The introduction of the third tier has led to “purchasing and smoking behavior of the smokers.”<sup>26</sup> Before price reduction, “79% of smokers used to buy loose cigarettes. After [the] price reduction that number reduced to 28%. Instead they started buying packets. Before price reduction, 21% were buying packets. But after [the] price reduction, that proportion increased to 72%.”<sup>27</sup>

According to the State Bank of Pakistan's second quarterly report for the financial year 2017-18, “cigarette production witnessed a major turnaround in H1-FY18, with its production expanding sharply by 69.8 per cent compared to a contraction of 30.9 per cent seen during the same period last year. The government's clampdown on counterfeits, smuggling, and tax evasion helped enhance the share of formal producers in the market<sup>28</sup>.” In July 2018, the central bank estimates the “cigarette prices - having a 3.7 per cent share in the food index - fell by an unprecedented 16.1 per cent YoY during the month, and played a crucial role in lowering the food inflation in the month.”<sup>29</sup>

The central bank also attributes slow increase in the overall collection of federal excise duty to “a fall in revenue collection from cigarettes by 11.8 per cent, despite a substantial increase in cigarette production. The sudden fall in FED collection from cigarettes was an outcome of a reduction in tax rate on lower tier brands.”<sup>30</sup>

WHO supports high taxation on tobacco use in Pakistan. “A uniform specific tax that accounts for 70% of average cigarette price could reduce overall cigarette consumption by 7.5%, increase tax revenues by 27.2 billion rupees, lead to over half a million users quitting and reduce premature deaths among current adult smokers by over 180,000, while also preventing 725,000 youth from taking up smoking.”<sup>31</sup>

<sup>20</sup> Ibid

<sup>21</sup> Dawn. August 10, 2018. Senate body irked by drop in revenue from tobacco sector

<sup>22</sup> Smokeless Tobacco and Vapour Products in Pakistan, August 2018, Euromonitor

<sup>23</sup> Ibid

<sup>24</sup> Maqbool, Shahina. Health agencies welcome increase in tobacco taxes, 19 September 2018, The News [<https://www.thenews.com.pk/print/370521-health-agencies-welcome-increase-in-tobacco-taxes>]

<sup>25</sup> Ahmad Chatta, Irfan. 2018. Pre-Budget 2018-19 Policy Brief: Govt. Kitty Vs Public Health - The Case of Reduction in Prices of Cigarettes in Pakistan. Policy Brief, Sustainable Development Policy Institute

<sup>26</sup> Ibid

<sup>27</sup> Ibid

<sup>28</sup> The State of Pakistan's economy, 2018. Second Quarterly Report FY 2018. State Bank of Pakistan, pp21

<sup>29</sup> The State of Pakistan's economy, 2018. Second Quarterly Report FY 2018. State Bank of Pakistan, pp40

<sup>30</sup> The State of Pakistan's economy, 2018. Second Quarterly Report FY 2018. State Bank of Pakistan, pp51

<sup>31</sup> Burki, Shahid Javed et al. (2013). The Economics of Tobacco and Tobacco Taxation in Pakistan, International Union Against Tuberculosis and Lung Disease (The Union)

## 1.4 Legislation for Tobacco Control

The first major legislation for tobacco control in Pakistan is the Prohibition of Smoking and Protection of Non-Smokers Ordinance 2002. The ordinance issued by the fourth military government in Pakistan prohibits smoking in public, tobacco advertisement, sale of cigarettes to minors, storage, sale, and distribution of cigarettes in the immediate vicinity of educational institutions etc.

Another ordinance - the Cigarette (Printing of Warning) (Amendment) Ordinance in 2002 - allowed the government to replace the health warning with stricter and specific warning. Earlier in 1979, again under the third military government, for the first time, the Cigarettes (Printing of Warning) Ordinance 1979 made health warning a must on all cigarette packs and tobacco ads. For WHO, Pakistan has achieved significant restrictions on tobacco advertisements. These include restrictions on tobacco advertisements on electronic media, newspapers, and magazines. The “ship sized billboards of tobacco advertisements on the roadsides are no more there”.<sup>32</sup>

However, it is important to note that no law on tobacco control has been passed by an elected legislature in Pakistan. A bill on tobacco control introduced in the provincial assembly of Khyber Pakhtunkhwa in October 2016 lapsed after the legislature’s term expired in 2018. The bill prepared with the technical assistance of WHO was opposed by cigarette manufacturers and tobacco farmers.<sup>33</sup>

There is a strong tobacco control civil society in Pakistan actively working since the early 2000s. The Coalition for Tobacco Control - Pakistan (CTC-Pak), a coalition of 262 NGOs, “advocates for stronger measures for tobacco control by the translation and adaptation of FCTC provisions into national tobacco control laws” as it “acts as a technical resource to the Federal Ministry of Health”<sup>34</sup>. The efforts of the tobacco control civil society led to ban on sheesha (water pipe) in Pakistan.

## 1.5 Harm Reduction and Tobacco Control Efforts in Pakistan

Harm reduction does not seem to be part of tobacco control efforts in Pakistan. In fact, it is seen as a ploy by the tobacco industry to promote smoking. An official of the Tobacco Control Cell (TCC)<sup>35</sup> in the federal Ministry of National Health Services, Regulation and Coordination in Islamabad categorically rejected the idea of harm reduction for tobacco control.

He insisted that in Pakistan the tobacco control efforts are based on the idea of protection from tobacco, with the focus on reducing its demand and supply. He also termed harm reduction “an industry-sponsored terminology”.

A leading tobacco control activist in Pakistan has called for condemning efforts “by the tobacco industry to get permission for using e-cigarette at public places such as restaurants and shopping centers”.<sup>36</sup> As he wants more scientific information on ENDS, “the government must bring laws to include e-cigarette as a tobacco product and prohibit its smoking and sale to under 18...”<sup>37</sup>

<sup>32</sup> Tobacco Legislation -Pakistan, WHO, [available at [http://www.emro.who.int/images/stories/tfi/documents/Law\\_PAK.pdf](http://www.emro.who.int/images/stories/tfi/documents/Law_PAK.pdf)]

<sup>33</sup> Dawn. Anti-tobacco bill in limbo in KP, May 2, 2017 [<https://www.dawn.com/news/1330530>]

<sup>34</sup> <http://www.ctcpak.org/about.htm>

<sup>35</sup> The TCC official agreed to talk with us in his personal capacity.

<sup>36</sup> Khan, Prof Javaid. 2015. E-cigarettes: A gateway to nicotine addiction? J Postgrad Med Inst 29(4): 213-4

<sup>37</sup> Ibid

## 2. HRP in Pakistan

This section discusses the use of HRPs as an alternative to combustible smoking in Pakistan. The main HRP currently in use in Pakistan is e-cigarette. The section reviews the legal and regulatory framework or rather the lack of it for HRPs.

### 2.1 Legal Status

The use of HRPs is hiding in plain sight in Pakistan. The vaping products are legally sold but the importers, sellers and users are confused about their legal status. The importers and sellers say the act of vaping has no legal status in Pakistan as currently, no law is governing it.

For them, there is nothing to stop anyone from doing anything while using e-cigarettes, hinting at the presence of clones or fake vaping products. “Vapour products such as e-cigarettes were still not subject to any major regulations...only subject to VAT, with no other taxes levied,” according to Euromonitor’s August 2018 report<sup>38</sup>. A vendor in Karachi described e-cigarettes as “neither legal nor illegal”.

However, a website backing HRPs in Pakistan - [www.pakistanvapes.com](http://www.pakistanvapes.com) - announces: “Vaping is NOT illegal in Pakistan! There is no law that prohibits the import or sale or use of vapes in the country. Anyone who tells you otherwise is lying or has no clue or is ignorantly associating vaping with *sheesha* smoking. Vapers, educate yourself and stand up for your rights!”

E-cigarettes are legally imported into Pakistan. They have been allocated a Pakistan Customs Tariff (PCT) code - 8543 7030. The code describes e-cigarette as “a battery-operated device in the shape of a round tube resembling a normal cigarette...measuring approximately 150mm in length and 11 mm in diameter. The device consists of (i) an atomizing part incorporating an air sensor, a pneumatic pressure switch, a vaporizing chamber, a vaporizer and a replaceable cartridge with a mouthpiece, containing an absorbing material saturated with a liquid to be vaporized, and (ii) a battery part composed of a light-emitting diode (LED), a pneumatic pressure switch and rechargeable lithium battery.” The description also explains its use. “When a user inhales through the device, air flow is detected by the air sensor, which activates an atomizer that heats and vaporizes the liquid in the cartridge. This produces a vapour mist which is inhaled by the user. The product is presented in a box for retail sale together with a power cord, a charger and five cartridges.”

According to vendors, vaping hardware (starter kits and accessories) are imported exclusively from China while e-liquids are imported from the United States, United Kingdom and Malaysia.

Though the vapour products are imported as consumer products and the e-liquids as the essential oil, the budget 2017-18 speech of the finance minister termed electric cigarettes in Pakistan as “not properly classified and therefore, are subject to only 3%” customs duty. He added that “keeping in view the harmful effect on health, it is proposed that electric cigarettes may be properly classified with 20% customs duty.”

Additionally, a lawsuit in Islamabad High Court in 2018 makes a case for the legality of e-cigarettes<sup>39</sup>. Artisan Vapor, one of the leading e-cigarette importers and vendors in Pakistan, has gone to the court against the local administration of Islamabad - Pakistan’s capital - for raiding the “franchise outlets and workplaces of the petitioners at several times terrorizing and harassing their staff and event confiscating

#### Lack of Data

There is almost a complete lack of data about the volume of HRPs import in to Pakistan, number of users, etc. In its August 2018 report on smokeless tobacco and vapour products, the Euromonitor International, the leading provider of strategic market research, got the numbers about HRP users in Pakistan wrong.

The report put the number of adult vapers at 1.8 million in 2017, with more women (974000) adult vapers than men (883000) in Pakistan.

However, when Euromonitor was asked about the 1.8 million figure, they said it was mistakenly reported, adding that the number of vapers in Pakistan are negligible. Their response said: “There is a mistake in this table. All rows should be blank. Although, there certainly are vapers in Pakistan, the number is still negligible. We have already flagged the issue and will aim to fix it as soon as possible. Our apologies for the inconvenience.”

<sup>38</sup> Smokeless Tobacco and Vapour Products in Pakistan - Analysis, Country Report, Aug 2018, Euromonitor

<sup>39</sup> Fahad Yousaf and Another Versus ICT etc. W.P.No. 1384/2018

the inventory.” Artisan Vapor maintains it “imports e-cigarettes and its accompaniments from the United States of America duly declaring the products on goods declaration forms and after paying all the taxes and duties imposed by the Government or Pakistan without any observation as to the illegality of the products, thus imported.”

The lawsuit also informs the court that “in Pakistan, e-cigarettes, specifically the Artisan Vapor products, have been declared safer than tobacco by the Pakistan Council of Scientific and Industrial Research (PCSIR) vide their report no ACRC/OFC/2016/ 169, dated 23 -12-2016.” The PCSIR undertakes, promotes and guides scientific and technological research for “problems connected with the establishment and development of industries under conditions prevailing in Pakistan, and to encourage the extension of the results of research to various sectors of the economic development....”

The council’s certificate terms the health risk of “yellowish viscous, flavored liquid having specific cigarettes smoke odor” of “e-cigarette liquid...safer than tobacco cigarettes.”

The Islamabad administration’s response to the petition shows the e-cigarettes are taken as a tobacco product. The administration maintained that the petitioner is misguiding the court as the active ingredient in the tobacco is nicotine “which the appellant has admitted in his reply is used in the flavors of e-cigarettes meaning thereby that these e-cigarettes are more dangerous than *Sheesha* and Cigarettes of tobacco by using the active ingredient of tobacco than in prepared form.”

The HRP users seem indifferent to the question of legal status. Most of the users said they were not bothered about the legal status of vaping in Pakistan.

## 2.2 Regulatory Framework

Currently, the HRPs are imported, sold and used in a regulatory vacuum in Pakistan. “Vapour products remained unregulated in Pakistan in 2017, with no specific laws in place governing their distribution, sale or usage,” says the Euromonitor.<sup>40</sup> The government in Islamabad, it seems, is only interested in the revenue from the import of vapour products. It is not interested in the use of HRPs for smoking cessation.

The TCC official in the federal health ministry said currently the government has no stance on the status or use of e-cigarettes in Pakistan.

There is vagueness about the e-cigarette use. As it sends out vapours, it is taken as another form of sheesha. In an interview with a local TV channel, Saira Afzal Tarar, the federal minister of health in the previous Pakistan Muslim League-Nawaz (PMLN) government, equated e-cigarettes with the sheesha and termed it harmful for health. She added that stopping the use of all such products is the responsibility of the provinces.<sup>41</sup> She said at the federal level a committee had been formed to look into the use of e-cigarettes in Pakistan, hinting legislation over the use of e-cigarette after receiving recommendations from the committee. However, the TCC official did not know about the formation of any such committee.

It is important to highlight that the representatives of the Pakistan Medical Association (PMA) and TCC did not know about the sale of vapour products, especially c-cigarettes, in Pakistan.

Local and foreign vendors in Pakistan are resorting to “self-regulation”, claiming they make every effort to avoid underage selling of e-cigarettes. Some of the websites selling e-cigarettes ask for age verification. Others ask for age verification when one opts to buy any of the vapour products. However, some websites do not ask for age verification. The vendors interviewed for this study maintained that they ask for Computerized National Identity Cards (CNIC) if they think that the young client is less than 18 years of age.

A leading tobacco control activist, Professor Javaid Khan, maintains “many shops and supermarkets in major cities of Pakistan like Karachi, Lahore, and Islamabad are selling e-cigarette to its customers without any age restrictions.”<sup>42</sup> He wants the government to “bring laws and include e-cigarette as a tobacco product and prohibit its marketing and sale to ‘under 18’ till the time we have more scientific information available on these nicotine delivery devices”.<sup>43</sup>

<sup>40</sup> Smokeless Tobacco and Vapour Products in Pakistan, Euromonitor, August 2018

<sup>41</sup> Under the 18<sup>th</sup> Constitutional Amendment, health as a subject has been devolved to the provinces since 2011.

<sup>42</sup> Khan, Prof Javaid. 2015. E-cigarettes: A gateway to nicotine addiction? J Postgrad Med Inst 29(4): 213-4

<sup>43</sup> Ibid

E-cigarettes are seen and used as recreational consumer products in Pakistan but without any accompanying regulations on the lines of the European Union's article 20 of the Tobacco Products Directive (TPD). There are currently no rules or directives for nicotine-containing electronic cigarettes and refill containers, minimum standards on the safety and quality of vaping devices and e-liquids, packaging and label rules, and monitoring and reporting of developments related to e-cigarettes.<sup>44</sup> There are also no mechanisms in place to ensure "electronic cigarettes and refill containers are child- and tamper-proof, are protected against breakage and leakage and have a mechanism that ensures refilling without leakage."<sup>45</sup>

However, the leading vendors remain updated about the legislative and regulatory measures regarding e-cigarettes outside Pakistan, especially in the UK. On their websites, they try to keep their customers informed about the legislative and regulatory developments in the US and the UK. On July 19, 2018, Whitemist, one of the leading vendors in Pakistan, posted a blog - *What you need to know about the new vaping legislation coming into force*. "The FDA regulations do not affect the vaping industry of Pakistan but these restrictions are a concern worldwide and once implemented, these regulations have the potential to influence their clauses in Pakistan," the blog said. It also provides information about e-cigarette use under the TPD including the nicotine level, advertisement, warning on e-liquids, etc.

Though the vendors promote the use of e-cigarettes as harm reduction and cessation tool, they seem satisfied with its current import status as consumer recreational product. Importing e-cigarettes as health/medical products and e-liquids as a pharmaceutical solution will entail complex and strict government rules. This may involve the Drug Regulatory Authority of Pakistan which notified Medical Devices Rules in 2015<sup>46</sup> along with healthcare procurement rules of Pakistan Procurement Regulatory Authority, an autonomous body responsible for prescribing regulations and procedures for public procurements by the federal government in Pakistan.

Importantly the vendors are keen to project e-cigarettes completely different from sheesha, which was initially also portrayed as a harmless smoking activity before being banned. They emphasize the fact that nothing is burnt in an e-cigarette. Explaining the difference between the two, the Artisan Vapors' lawsuit maintains "sheesha smoking isn't really supposed to involve combustion of the tobacco, it occasionally can, and this is big a difference between sheesha and vaping".<sup>47</sup>

### 2.3 HRP Users

There are no exact figures available about the number of HRP users in Pakistan. Euromonitor in its August 2018 report put the number of adult HRP users in Pakistan at 1.8 million in 2017, with more women adult vapers than men. The estimate suggested the number of adult HRPs users has witnessed a steep surge of 106% from 2016 to 2017 - reaching 1858000 from 898000. However, when Euromonitor was asked about the 1.8 million figure, they said it was mistakenly reported, adding that the number of HRP users in Pakistan are negligible. The admin of the facebook group Pakistan Vaping Community (PVC) estimated 50000 adult vapers in Pakistan. The data is not reliable as no effort has been made in Pakistan to gather data about the HRP users in Pakistan. One of the reasons may be the HRP users shifting between combustible smoking and vaping.

The manager of a leading vaping outlet in Islamabad said a number of clients are dual users of smoking and vaping. He maintained that one-third of the HRP users go back to conventional smoking. This highlights the need for carrying out a countrywide survey of adult HRP users in Pakistan.

The decision to start vaping is a personal choice, mostly based on the word of mouth or the user coming across an e-cigarette outlet. Smokers shifting to vaping are doing so on their own, and without any medical consultation. A doctor in Karachi, who himself uses HRPs, maintained that the use of e-cigarette is still in infancy in Pakistan, with no solid research to back its use. He added the doctors in Pakistan have no

<sup>44</sup> E-cigarettes: Regulations for consumer products [available at <https://www.gov.uk/guidance/e-cigarettes-regulations-for-consumer-products>]

<sup>45</sup> Article 20 of the TPD

<sup>46</sup> The rules which were updated in 2017 define active medical device as "the operation which depends on a source of electrical energy or any source of power other than that directly generated by the human body or gravity and which acts by converting this energy but does not include medical devices intended to transmit energy, substances or other elements between an active medical device and the patient without any significant change"

<sup>47</sup> Fahad Yousaf and Another Versus ICT etc. W.P.No. 1384/2018

knowledge about e-cigarettes and therefore they are not recommending its use for harm reduction or smoking cessation.

During our consultations in Karachi and Islamabad, we came across three kinds of HRP users - those who have given up conventional smoking and shifted to e-cigarettes, those who are continuing with dual use of conventional and e-cigarettes, and those who have reverted to conventional smoking after trying e-cigarettes.

A young chartered accountant in Karachi said he gave up conventional smoking and started vaping. Ultimately he gave up vaping, saying “now, no tobacco and no nicotine.” Another vaper in Islamabad said he went back to conventional smoking because he did not get what he was looking for. Still, an owner of a vaping outlet in Rawalpindi’s upscale market admitted that he used both electronic and conventional cigarettes.

It is interesting to note that most of the vendors have been former smokers who shifted to e-cigarettes, found it beneficial, and opened a vaping outlet.

Underage HRP use is a concern for the vendors. They deny selling e-cigarettes to under-18. They check CNICs of the young people coming to their shops. Some of the vendors said they refuse to sell e-cigarettes to under-18 and tell them to leave. Currently, there is no regulation for applying such checks and the vendors are applying on their own.

Some leading tobacco control activists believe that in the absence of regulation, youth is the main target of e-cigarette vendors, fearing this is the gateway to smoking. The users of e-cigarettes are educated, with access to the internet. They keep themselves updated about the developments regarding e-cigarettes, especially the UK. The e-cigarette users are not bothered about its legal status in Pakistan. For them, it is available and they are using it.

Though their choice of shifting to vaping is personal, once convinced that it is safer than combustible smoking, they are even ready to tell their parents. In Pakistan traditionally the parents are last to know about the habit of smoking by children. However, one of the e-cigarette users in his 30s in Karachi maintained that he informed his parents about the decision to start using e-cigarettes instead of conventional cigarettes. “I did it after I became convinced about the benefits of e-cigs for my health.”

## 2.4 Selling E-cigarettes in Pakistan

The main mode of selling e-cigarettes in Pakistan seems to be online. According to the list of vendors on the facebook page of PVC, most of them are urban-based, operating in Karachi, Islamabad, Lahore, Multan, Rawalpindi, Peshawar, Sialkot, and Faisalabad. The list contains information about 37 vendors across Pakistan. Most of the vendors - 17 - are based in Karachi. The list provides information about their websites, social media presence, free delivery, number of flavors they sell, contact numbers etc.

This shows that use of e-cigarettes is limited to urban centers of Pakistan. Further, the vendors are targeting the urban population which has round the clock access to internet and which can afford higher prices of e-cigarettes. Though nobody has exact figures about the number of e-cigarette shops in Pakistan, it is estimated to be between 30 and 40. Artisan Vapor, an American retail store-based electronic cigarette distributor, has 16 outlets in Pakistan - all in upscale markets. Almost all vendors throughout Pakistan use websites to announce new arrivals of kits, e-juices, coils, etc. besides updating their clients on the regulatory and research developments regarding e-cigarettes. They offer free delivery provided the orders meet their minimum price bar. This minimum price range for free delivery of e-cigarettes/flavors is between Rs2500 to Rs6000 (20 to 47 dollars). Vendors are using online payment avenues such as Easy Paisa, UBL Omni, Mobicash, Timepey and Upaisa. They also ensure home delivery within the city. Some vendors are only selling e-liquids while most are selling everything associated with e-cigarettes.

## 2.5 An Expensive Alternative

Vendors termed vaping an expensive hobby in Pakistan. Their clients come from the middle class, higher middle class and the elite - those who can afford to buy e-cigarettes which are much expensive than the combustible cigarettes. “Apart from them, we have some customers from low middle class, but they are one-time customers,” explained one of the vendors in Islamabad. “Let’s say we are retailing a 100 ml bottle for Rs3500; that is roughly 30 US dollars in Pakistan. But a pack of cigarettes in Pakistan costs Rs150

(1.18 dollars),” he added. One of the users in Karachi said his monthly expenditure on vaping is between Rs5000-Rs10000 (40 to 80 dollars).

On average a starter kit available on the website<sup>48</sup> of a leading vaping vendor costs Rs4700 (38 dollars). Digital mods are costlier. Their prices start from Rs3500 (27 dollars) and go up to Rs12500<sup>49</sup> (99 dollars). On average a digital can cost Rs8207 (65 dollars). The cost of e-liquids in Pakistan is between Rs300 and Rs2200<sup>50</sup> (2 to 17 dollars).

#### Average prices of e-cigarette accessories

Product	Minimum Price (\$1 = 127 PKR)	Maximum Price
Starter Kit	2500	9000
Digital Mod	3500	12500
E-Liquid	500	2200

Though the vendors try to explain that in the long run vaping is cheaper than combustible smoking in terms of how one consumes flavors, and what are the health benefits, etc., the prices are too high for smokers to convert to e-cigarettes. The vendor in Islamabad explained: “If someone is smoking two packs of Rs200 Dunhill (1.5 dollars), we can offer him vaping as a better and cheap alternative. But those who buy Rs50 (40 cents) a pack of Capstan will not shift to vaping mainly because of pricing.” The average amount spent on 20 manufactured cigarettes in Pakistan<sup>51</sup> is only Rs40, which is approximately 35 cents. Currently, none of the duty paid cigarettes in Pakistan cost more than Rs150 (a little more than a US dollar). The cigarette price in Pakistan is considered to be the cheapest in the world.<sup>52</sup> In 2012 the “most sold and cheapest brand of cigarettes per pack in US\$, was 2.83 in Sri Lanka, 1.65 in India, 0.84 in Nepal, 0.51 in Afghanistan and 0.33 in Pakistan”.<sup>53</sup>

#### Prices of Duty Paid Cigarette

S #	Brand	Price in Rs. (\$1 = 127 PKR)
1	Gold Street Premium	30
2	Benson and Hedges (B & H)	140
3	Capstan	50
4	Dunhill	140
5	Gold Leaf	135
6	Gold Flake	50
7	Embassy	50
8	Morven Gold	50
9	Marlboro	145
10	Diplomat	50
11	K 2	50
12	Red & White (R&W)	50
13	Kisan	25

The higher prices of e-cigarettes and the difference with the combustible cigarettes is a major hurdle to convincing smokers in Pakistan to opt for HRPs. This price difference is too large for an ordinary smoker to bridge.

<sup>48</sup> <https://e-litecigs.com/product-category/electronic-cigarettes/starter-kits/>

<sup>49</sup> <https://e-litecigs.com/product-category/electronic-cigarettes/digital-mods/>

<sup>50</sup> <https://whitemist.co/product-tag/best-seller/>

<sup>51</sup> Global Adult Tobacco Survey, Factsheet Pakistan 2014 [available at [https://www.tobaccofreekids.org/assets/global/pdfs/en/Pakistan\\_GATS\\_fact\\_sheet.pdf](https://www.tobaccofreekids.org/assets/global/pdfs/en/Pakistan_GATS_fact_sheet.pdf)]

<sup>52</sup> Khan, Javaid. 2012. Tobacco Epidemic in Pakistan. J Postgrad Med Inst, 23(3): 233-6

<sup>53</sup> Ibid

None of the vaping kits is manufactured in Pakistan. All are imported from China. E-liquids are imported from the US, UK and Malaysia. The government of Pakistan increased the customs duty on the import of “machine for electric cigarettes”<sup>54</sup> from 3% to 20% in the 2017-18 budget. Other duties include 17% sales tax/federal excise duty and 6% or 9% withholding tax. The customs duty on e-liquids, imported as essential oils, is 11% along with 17% sales tax/federal excise duty and 6% or 9% withholding tax.<sup>55</sup>

#### Detail of custom duties on e-cigarettes in Pakistan

PCT CODE		DESCRIPTION	UoM	CD (%)	RD (%) / Addl. Duty	ST/ FED (%)	WHT (%)	Concessions/ Exemptions SRO Ref.	FTAs / PTAs (%)	Import Policy
Heading / Sub-heading	Statistical suffix									
- Other machines and apparatus:										
8543.7010		--- Remote control	u	3		17	6 or 9	Fifth Sch. Pt.I CD @0%&3%; Sixth Sch. Tbl.III=ST Exempt; Eight Sch ST 10%;	CN=0; MY=0; SAFTA=5;	-do-
8543.7020		--- Insect killer	u	20		17	6 or 9	Fifth Sch. Pt.I CD @0%; Sixth Sch. Tbl.III=ST Exempt;		
8543.7030		--- Machine for electric cigarettes	u	20		17	6 or 9			

The vendor in Islamabad said all duties and taxes and the shipping cost is factored in while deciding about prices of vaping products. “Obviously the expenditure on our retail outlet is made part of the pricing. Our prices are little higher than the online retailers of e-cigs. Our customers come and check flavors. This is an added cost. Every flavor that we import, we have a bottle reserved for the customer to try it. After all this, we are also looking for a healthy profit.”

As most of the vaping outlets in Islamabad, Rawalpindi, Karachi and Lahore are in the upscale localities, the rent and other expenditures such as staff salary also contribute to higher prices of the vaping products.

Cheaper e-cigs and e-liquids are available on paan (beetle) shops in the cities. However, PVC facebook page warns against buying from paan shops. They maintain the e-cigs and e-liquids available on beetle shops are clones/fake. “If you bought a device from a local Pan Shop, you probably got ripped off,” it says. Another website [www.pakistanvapen.com](http://www.pakistanvapen.com) also asks the vapers not to buy e-liquids from “China or your local paan shop”.

## 2.6 Advertisement

As such, there is no advertisement of HRP in Pakistan. One of the reasons may be the fear of the vendors and users that the e-cigarettes may meet the fate of sheesha, which became popular as less harmful product but was later banned in parks, hotels, restaurants, cafés and clubs. Another reason is that the HRP remain “an insignificant category in value terms. Word-of-mouth is the only marketing tool for vapour products in Pakistan”.<sup>56</sup> However, the websites of vendors, both local and foreign, and the social media remain a source of e-cigarette advertising.

All websites of vendors in Pakistan are in English and none is in Urdu, the national language, or in any of the regional languages. Websites are colorful and flashy, prominently splashing large pictures of products on the front page.

<sup>54</sup> Pakistan Customs Tariff 2017-18, page 468

<sup>55</sup> Pakistan Customs Tariff 2017-18, page 207

<sup>56</sup> Smokeless Tobacco and Vapour Products in Pakistan, Euromonitor, August 2018

A major source of advertisement is the facebook groups. Leading among them is the PVC, with nearly 11500 members. One can join only through invitation.

Another facebook groups include e-juice Pakistan with around 1500 members, Pakistani Vapers Union with 609 members, Cloud 9 Vaping Club Pakistan with 2385 members.

PVC enlists vendors in Pakistan, asking them to provide addresses of websites, facebook page, registered shop/office address, tax identity number, working hours, etc. The vendors or their employees must be over 18 to become a member of the group. Two days - Wednesdays and Sundays - are reserved for sale posts on the PVC. The members frequently share information about kits, e-liquids and ask for recommendations on the use of nicotine level. Another mode of advertisement is the holding vape meets. Vendors arrange such meetings at their outlets.

## 2.7 Clones/fake Vapour Products

Clones/fake vaping products remain a worry for the vendors and vapers in Pakistan. A clone is defined as “a knock-off of an ecig and/or tanks. Generally, clones only exist for the more expensive ecigs and/or tanks.”<sup>57</sup> A vendor in Islamabad pointed out that a downtown market in Rawalpindi city is replete with “fake e-liquids” which are imported from China. He maintained that fake liquids are copies of the American brands. He was also worried that the beetle (paan) shops are selling clone e-cigs and e-liquids. “The small shops of paan have started selling e-liquids. We are selling for Rs1800 (14 dollars) and the paan shop is selling it for Rs300 (2.3 dollars). But it is poisonous.”

In Karachi where most of the e-cigarette vendors are based, Bolton Market has been pointed out as the hub of clone or fake vapour products. The PVC admin claims that no one in Pakistan has the know-how to emulate the imported flavors.<sup>58</sup> He added that the fake e-liquids are prepared outside Pakistan. These are cheap copies of the standard flavors as substandard ingredients are used.<sup>59</sup>

PVC names and shames vendors who are selling clones. Such vendors are included in its ‘Wall of Shame’. One of them is vapestazaar.pk. According to PVC, “Owner is underage, admits to selling clones and fakes to keep [a] competitive edge, admits to hiring underage employees.” Another individual has been included in the Wall of Shame for “stocking and selling clone mods”.

Vapestazaar.pk introduces itself as “one of the largest online vape shops in Pakistan since 2016”. However when their outlet was visited in Karachi in August 2018, it was not a shop but an apartment where no e-cigarettes and e-liquids were displayed. Most of the staff working seemed to be under 18 years of age.

The owner of Vapestazaar.pk, himself a young man, also maintained that fake e-liquids are prepared in Pakistan, mainly in Karachi and Faisalabad, a city of Punjab province. “There is a lot of fake production of e-liquids in Karachi,” he said but did not name such markets<sup>60</sup>. “I call them fake because individuals are preparing them for sale, and not for their personal use as DIY,” he said. “The fake of an original flavor costing Rs2500 is available for Rs1000.” When a fake e-liquid is used, he added, the user may have a sore throat, and may have cough. He admitted that his outlet is not a member of PVC mainly because “we are not at good terms with the admin of the group”.

## 2.8 HRP Research in Pakistan

As the use of e-cigarettes in Pakistan is limited, three survey studies have been conducted in the last two years. The focus of the three surveys, limited to the province of Sindh, especially Karachi, has been on the awareness, perception and use of e-cigarettes. No medical research on e-cigarette has been carried out in Pakistan.

<sup>57</sup> Vaping Terminology, [available at <https://www.pakistanvapes.com/vaping-terminology/>]

<sup>58</sup> Interview with the admin of facebook group Pakistan Vaping Community in Karachi

<sup>59</sup> Ibid

<sup>60</sup> Interview the owner of Vapestazaar.pk in Karachi

The Aga Khan University's Department of Medicine claims to have carried out the first study on the Awareness, use and perceptions about E-cigarettes among adult smokers in Karachi, Pakistan, in 2016. Published online<sup>61</sup>, the study concluded that the use of e-cigarettes is associated with gender (mostly males are taking up vaping), higher education, professional occupations, higher family income, and younger education. Most of the respondents (64%) heard about e-cigarettes from their friends. Only 7% heard about e-cigarettes from a medical professional. Almost half of the respondents (45%) thought the e-cigarettes are less harmful than conventional cigarettes while 35% agreed the e-cigarettes help in quitting smoking.

The other survey, also carried out by the Section of Pulmonology and Critical Care, Department of Medicine, Aga Khan University Hospital, Karachi, focused on the use and perception of e-cigarettes<sup>62</sup> among medical students in five universities of Sindh. The survey maintained that fairly high numbers of respondents were aware of e-cigarette. Its use was generally low compared to conventional tobacco products. Majority of the e-cigarette users were male. Out of the 500 students of the five universities, only 6% (31) were using e-cigarettes but two-third of the respondents knew about ENDS. Out of the 31 users of e-cigarettes, 27 were also smoking conventional cigarettes. The study recommended "a periodic surveillance...for a better understanding of e-cigarette use in different populations and settings" besides "laws against its promotion and marketing". It also called for prohibiting the sale of e-cigarettes "as a safe alternative before having definitive evidence demonstrating its benefits". The third survey was carried out in Karachi in January 2017, focusing on knowledge and attitude of teenagers about e-cigarettes<sup>63</sup>. Published online<sup>64</sup> in July 2017, the cross-sectional study "interviewed 441 young individuals, aged 13 to 19 years, to determine their knowledge, attitudes, and practices regarding e-cigarettes". Its findings included higher knowledge about e-cigarettes among respondents (69%) but lesser awareness about the contents. Most of the respondents (60%) heard about e-cigarettes from their friends. The study concluded that more than half of the teenagers did not have any "significant knowledge about e-cigarettes and showed a restraining attitude towards its use".

The three studies have been limited to the province of Sindh, with focus on metropolitan Karachi. The studies used convenience sampling, leading to more interviews with females than males, who are more frequent users of conventional and electronic cigarettes. The study on the use of e-cigarettes among the medical students has more female (58%) than male respondents. None of the three studies looked into the factors such as the legal status of HRPs, their availability, regulations governing their sale, views of the government and the tobacco control stakeholders. The studies do indicate the use of e-cigarettes as less

### A Vaping Activist

Mirza Abeer is the go-to person for all the vaping information in Pakistan. Today he describes himself as "a vaping activist".

A lawyer, he started smoking at the age of 15.

"I used to smoke half a pack every day. I was facing breathing problem. My asthma was acute. I had no stamina for physical activity. But let me tell you I loved smoking."

Thirteen years on, Abeer shifted to e-cigarettes and did not look back. "During the first year of vaping, my taste buds improved. My asthma attacks decreased. But most importantly I started to dislike tobacco taste."

As he started to feel better about himself after starting vaping, Abeer became part of the people who started a facebook group, Pakistan Vaping Community. As one of the admins, he is proud the group has more 11000 members. "Now it is growing daily. Majority of the members of the PVC are vapers. Now I can say that out of 10000, 98% of them are former smokers or sheesha users."

Today he is an essential part of the launching of vaping outlets in Karachi as he is also a taster of e-liquids. His word is considered authentic. He has authored a guide to vaping Pakistan. Abeer is a strong advocate of regulating the use of e-cigarettes in Pakistan. He backs the import of e-cigarettes as a health product with doctors prescribing it as a smoking cessation device.

<sup>61</sup> [https://ecommons.aku.edu/pakistan\\_fhs\\_mc\\_med\\_pulm\\_critcare/53?utm\\_source=ecommons.aku.edu%2Fpakistan\\_fhs\\_mc\\_med\\_pulm\\_critcare%2F53&utm\\_medium=PDF&utm\\_campaign=PDFCoverPages](https://ecommons.aku.edu/pakistan_fhs_mc_med_pulm_critcare/53?utm_source=ecommons.aku.edu%2Fpakistan_fhs_mc_med_pulm_critcare%2F53&utm_medium=PDF&utm_campaign=PDFCoverPages)

<sup>62</sup> Iqbal, Nousheen et al. 2018. Electronic cigarettes use and perception amongst medical students: a cross-sectional survey from Sindh, Pakistan, Section of Pulmonology and Critical Care, Department of Medicine, Aga Khan University Hospital,

<sup>63</sup> Shaikh, Asim et al. 2017. Knowledge and Attitude of Teenagers Towards Electronic Cigarettes in Karachi, Pakistan, Cureus

<sup>64</sup> Available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5597062/>

harmful to the conventional smoking along with the factor of a higher socio-economic factor associated with its use.

Importantly the studies have pointed out important areas to be explored vis-à-vis use of HRP in Pakistan. These include covering lower socioeconomic rural regions and people of different age groups, side effects and benefits of ENDS, what systems are needed to be in place for HRP use as a means to quit conventional cigarette smoking, promotion and advertisement of HRP in Pakistan, etc.

## 2.9 HRPs and Media

The coverage of e-cigarette use in Pakistan's news media<sup>65</sup> is sparse, mostly presenting vaping as a harmful activity. It is compared with sheesha, which has been banned in Pakistan.

The news stories about the use of e-cigs and vaping were searched online both for English and Urdu print and electronic media. A total of 22 stories were found online in mainstream Urdu and English print media in Pakistan. A number of stories were also found on Pakistani websites which provide a medley of views and news on political and social issues.

Most of the coverage has been reported in the mainstream English newspapers - Dawn, The Nation, Express Tribune and Pakistan Observer. In the mainstream Urdu newspapers, the stories mainly rely on the studies carried out in the US and Europe which warn against considering vaping as a safe smoking activity. Some stories in Urdu newspapers compared e-cigarettes to a "poison".

The first major story in Pakistan's news media was in Express Tribune, a national English daily, in 2013. E-cigarette: Put this in your pipe and smoke<sup>66</sup>, published on 28 April 2013, was a sort of a primer, explaining what is an e-cigarette, how to use it, and pointed out lack of regulation in Pakistan.

There have been a few stories between 2014 and 2016 despite the fact that in these two years the e-cigarette users started to increase in Pakistan.

Thought the number of stories on vaping slightly increased in 2017 and 2018, the tone remained negative. A story in a national Urdu newspaper, Ausaf, termed vaping a "poisonous activity<sup>67</sup>" which it says is going on in Islamabad "unnoticed". It presents vaping as a ploy of the international tobacco companies to promote smoking.

Overall the news media in Pakistan relies on the studies which suggest vaping may lead to various diseases. The research work in the UK supporting the use of e-cigarettes is almost completely missing from the stories published in Pakistan.

A story<sup>68</sup> in daily Dawn, Pakistan's leading English newspaper, did mention e-cigarettes as 95% less harmful than combustible cigarettes. But the story did not explain the background to their safety compared to combustible smoking. Overall the story tried to present the views of the tobacco control stakeholders in Pakistan, including the TCC.

Earlier in 2017 a story in Dawn - To vape or not to vape<sup>69</sup> - gave a balanced view of vaping in Pakistan, as the reporter talked with users of e-cigarettes.

A story on Express TV presented vaping as another form of sheesha and an addiction presented as a safer alternative to combustible smoking. It calls for legislation for restricting/banning vaping in Pakistan. The story quotes the former health minister who says no matter whatever e-cigarette is, it is a health hazard.

The coverage in Pakistan is marked by negative perception, presenting e-cigarette as a gateway to smoking for the young users. There is a need to engage with news media in giving them the complete picture about vaping. The research backing the use of vaping for harm reduction and cessation needs to be shared with the mainstream news media in Pakistan.

<sup>65</sup> For a sample of a stories in Pakistani media, see Annex IV

<sup>66</sup> <https://tribune.com.pk/story/539877/put-this-in-your-pipe-and-smoke-it/>

<sup>67</sup> <http://epaper.dailyausaf.com/popup.php?newssrc=issues/2018-03-29/45066/3101>

<sup>68</sup> 'Young people who experiment with e-cigarettes likely to try smoking', <https://www.dawn.com/news/1424079>, August 1, 2018

<sup>69</sup> <https://www.dawn.com/news/1317222>

### 3. Tobacco Control Stakeholders

Led by WHO, Pakistan has a vibrant tobacco control stakeholders. For the last 15 years, they have been working on tobacco control. This section gives an overview of the main tobacco control stakeholders in Pakistan and their stance on HRP, especially e-cigarettes.

#### 3.1 World Health Organization

WHO representative in Islamabad refused to meet and discuss the use HRP in Pakistan. The representative made clear that WHO is not working on any harm reduction strategy or project in Pakistan. He also added that WHO would not work with any research backed by the FSFW.

#### 3.2 Government Stance on HRP

There seems to be no official stance on e-cigarettes/vaping in Pakistan. One of the reasons may be that the use of e-cigarettes in Pakistan is in its infancy and the number of vapers is negligible. Its use and market size is extremely small compared to combustible smoking. According to the GATS 2014, Pakistan has more than 23.9 million tobacco smokers. Though there are no estimates about the number of e-cigarette users in Pakistan, various estimates put them around 40000 to 50000.

The official of the Tobacco Control Cell in the federal National Health Services and Regulations in Islamabad maintained that there is currently a state of confusion on the use of e-cigarettes and that is why “we are also not taking any practical step in this regard. We are observing the situation.” He maintained that they need strong scientific and independent evidence to take stance on the use of e-cigarette as a harm reduction and cessation tool.

The official said he has seen the reports of Public Health England backing the use of e-cigarettes for smoking cessation, but added it is still in the evolving stage.

“We will wait for evidence, which should be unbiased and independent. Whatever decision we take, we will take it after taking our international partners into confidence. We have made international commitments on tobacco control. We are part of the international community in this regard.” It is important to mention that while asking for unbiased evidence, the official said it should be independent of industry influence such as the Philip Morris International.

He said the issue of e-cigarettes will be discussed at the Conference of the Parties (COP8). He added he was not authorized to disclose Pakistan’s stance on e-cigarettes. Currently, the federal health ministry is not taking any measure on regulating e-cigarettes. “We will not take any step for or against e-cigs/vaping in Pakistan. The Ministry of Health is not a moral police. We will decide wisely and that decision will be in the favor of the people. When the Ministry will issue an advisory regarding e-cig/vaping, it will also own it. We are currently facing lack of information regarding e-cig/vaping. As soon as we have information, we will move in this direction.”

The official was confident that the Prohibition of Smoking in Enclosed Places and Protection of Non-Smokers Health Ordinance, 2002 is comprehensive to regulate the e-cigarettes also.

It is important to highlight that the official did express willingness to look at the evidence supporting the use of e-cigarettes as a cessation tool. Though at present he maintained that Pakistan would go along with the position taken by international partners including WHO on e-cigarettes, he added that if it is proved that e-cigarettes facilitate in smoking cessation and the quitting rates increase, Pakistan should think about exploring this avenue.

#### 3.3 Pakistan Medical Association

The association currently has no stance on the use of e-cigs in Pakistan. The PMA representative maintained that if science backs the use of e-cigs and there is consensus among the stakeholders on it as a smoking cessation tool, the association is ready to work on it. He added that for the association to back the use of e-cigs as a harm reduction and smoking cessation tool, there is a need for strong scientific evidence proving that it is beneficial for the smokers. The PMA representative said the association cannot afford a divided opinion if it opts for recommending the use of e-cigarette in Pakistan. “We cannot have a situation where some people say that e-cigs are not good and the association is backing a negative product.” The representative was open to working with stakeholders, including the FSFW, on ways to

reduce the consumption of conventional cigarettes. He stressed the need for research on vapour products in Pakistan.

Currently in Pakistan, according to the PMA representative, doctors are not recommending e-cigs as a smoking cessation tool.

It is interesting to note the PMA representative made a comparison of e-cigs with the use of *sheesha* in Pakistan. He said initially the sheesha was presented as a harmless smoking device containing flavors, which led to families, including children, smoking sheesha. He also expressed concern that the use of e-cig may lead to an increase in conventional smoking, especially among the young.

It was also clear that the PMA representative seemed to be more interested in the prohibition of smoking, expressing doubts about providing smokers less harmful alternatives. But at the same time he was ready to listen to and work with stakeholders backing new alternatives such as vaping.

### 3.4 Coalition for Tobacco Control - Pakistan

The Coalition for Tobacco Control - Pakistan is a coalition of 262 NGOs working on tobacco control for the last ten years. It works to strengthen the development and implementation of policies based on the provisions of FCTC through advocacy campaigns and acts as a technical resource for the federal Ministry of National Health Services, Regulation and Coordination.

The use of e-cigarettes for harm reduction and smoking cessation is not part of the coalition's mandate. The coordinator of the coalition in Islamabad knows about the use of e-cigarettes in the capital city and the rest of the country. Though the coalition has not taken any stance on the use of e-cigarettes, their coordinator thinks the current anti-smoking laws cover the use of tobacco in any form<sup>70</sup>. He calls for regulating the use of e-cigarettes in Pakistan<sup>71</sup>.

However, the coordinator maintained that the coalition is open to listen to scientific evidence supporting the use of e-cigarettes for harm reduction and smoking cessation. He is aware of the developments regarding the use of e-cigarettes outside Pakistan, especially in the UK. Though the tobacco control efforts are concentrated on the prohibition and protection of non-smokers, the coordinator agreed with the assertion that there is a need for a safer alternative for the adult smokers in Pakistan, provided the beneficial option is backed by science and research.

### 3.5 Pakistan National Heart Association (PANAHA)

PANAHA is a non-profit organization working on the awareness about the harmful effect of tobacco on our health. The organization terms e-cigarettes extremely harmful for health. It says the use of e-cigarettes can lead to mouth cancer. It has asked the federal government to bring in a law against the e-cigarette use.

<sup>70</sup> To vape or not to vape...Dawn, Feb 27, 2017, [available at <https://www.dawn.com/news/1317222>]

<sup>71</sup> Ibid

## Findings

1. Data for HRP and their use is almost non-existent in Pakistan. A nascent phenomenon, e-cigarette or vaping is an emerging HRP in Pakistan.
2. Though Pakistan has no clear or defined regulations for the use of HRP including imports, manufacturing or product contents etc., e-cigarettes and associated products are legally imported as consumer goods, with various tax duties imposed on them.
3. Stakeholders working on tobacco control in Pakistan, including the government, health professionals and civil society, are following the position of WHO's local office which like the global environment are taking the precautionary approach to HRP.
4. The research on HRP in Pakistan remains patchy with three studies undertaken in the last two years. The geographic reach of these studies was limited to one city in the province of Sindh with the focus of assessing awareness, perception and use of e-cigarettes. No medical research with regards to e-cigarette or HRP has been carried out in Pakistan.
5. Vaping is currently limited to an urban, upper class in cities like Karachi, Lahore, Islamabad, and Peshawar. Vaping prices are much higher than the combustible smoking cigarette packs.
6. Most of the e-cigarette outlets in Pakistan are in upscale localities in metropolitans. Their number is steadily increasing.
7. The decision of shifting to HRP from conventional smoking is an individual decision. Almost no medical consultation is involved as doctors are currently not recommending HRP as a harm reduction and smoking cessation tool. The main aim of shifting to HRP is improved health such as breathing, taste buds, better stamina, etc.
8. Print and electronic media in Pakistan generally portray HRP vaping as a harmful activity.
9. Vendors and HRP users want the federal and provincial governments to introduce regulation on the import, sale and use of e-cigarettes, through a consultative process, taking the interests of smokers in consideration and central to any legislation.

## ANNEXURES

### Annex-I List of Interviews

1	Official	Tobacco Control Cell, the Ministry of National Health, Services, Regulations and Coordination
2	Dr Sajjad Qaiser	Secretary General Pakistan Medical Association
3	Official	World Health Organization
4	Usman Awan	Owner of the Vape Center in Rawalpindi
5	Representative	Coalition for Tobacco-Pakistan
6	Dr Ausaf	Medical practitioner in Karachi
7	Mir Zulfiqar Ali	Executive Director, Workers Education & Research Organization - an NGO based in Karachi, Sindh
8	Riaz Yousaf Zai	Basic Integrated Rural Development Society (BIRDS) - an NGO based in Nowshera, Khyber Pakhtunkhwa
9	Usman Awan	Owner of the Vape Center in Rawalpindi
10	Usman Farooq	Owner of Grey Gorilla in Karachi
11	Asfandyar	One of the owners of Big Cloud Vaping
12	Umer	Owner of Vapebaazar.pk, based in Karachi
13	Shafi Bangash	Manager of Artisan Vapors in Islamabad
14	Mirza Abeer	Admin of Pakistan Vaping Community
15	Askar Ali	A user who shifted to vaping from smoking. He also gave up vaping. He is based in Karachi.
16	Hussain Mohsen	Vaper in Karachi
17	Sarosh Iqbal	Vaper in Karachi
18	Hassan Raza	Vaper in Karachi
19	Hussein Ali	Vaper n Karachi
20	Rameez Khan	Vaper in Karachi
21	Suleman	Vaper in Rawalpindi

## Annex-II List of E-cig vendors in Pakistan

Sr.	Name	website	Mode of Selling	City/Address	Age Verification
1	Vapemall	<a href="http://www.vapemall.pk">www.vapemall.pk</a>	Free Delivery: On orders above Rs5000 otherwise Rs250 across Pakistan and 100 for Lahore. Cash-On-Delivery: Yes. Purchase methods: Via outlet, online or phone/whatsapp. Self Pick-up point: Johar Town, Lahore.	Lahore Branch: 73-J, First Floor, Commercial area, Phase V, DHA, Lahore.	Yes, only when one opts a vaping product
2	Clouded Judgement	<a href="http://www.clouded-judgement.com/">http://www.clouded-judgement.com/</a>	Free Delivery: On orders above Rs. 4000 Cash on Delivery: Yes and Payment can be made via Direct Bank Transfer, Easy Paisa, Mobicash. Purchase methods: Online and via Phone.	Lahore	Yes, as one opens the website
3	White Mist Co	<a href="http://whitemist.co/">http://whitemist.co/</a>	Free Delivery: On Orders over Rs250 else a flat rate of Rs250 Cash on delivery: Yes Purchase Methods: Online only as of now.	Karachi	Yes, as one opens the website
4	The Artisan Vapor Co	<a href="http://www.artisanvapor.pk/">(http://www.artisanvapor.pk/)</a>	Free Delivery: No Cash on Delivery: Yes and Payment can be made via Direct Bank Transfer, Easy Paisa, UBL Omni, Mobicash, Timepey and Upaisa.	Islamabad	Yes, as one opens the website
5	E-Lite	<a href="http://www.e-litecigs.com/">(http://www.e-litecigs.com/)</a>	Free delivery: Yes Cash on delivery: Yes Purchase methods: Online, Via phone and Outlets	Karachi, Lahore, Islamabad, Faisalabad, Sialkot	No, it does ask for age verification
6	The Wholesale Store	<a href="http://thewholesalestore.pk">thewholesalestore.pk</a>	Free Delivery: Nationwide Free Delivery (Minimum Order Rs5000), Cash on delivery: Yes, Purchase methods: Online and phone		Yes, as one opens the website
7	Vapor's Loft Pakistan	<a href="http://www.vaporsloft.com">www.vaporsloft.com</a>	Free Delivery: Nationwide Free Delivery (Minimum Order PKR 2500) Cash on delivery: Yes. (Karachi Orders are delivered under 24 Hrs standard time, but usually same day delivery) Purchase Methods: Online, Phone and Email.	Karachi	Yes, as one opens the website
8	Karachi Vapers	<a href="http://www.karachivapers.com">www.karachivapers.com</a>	Free Delivery: up to Rs5000 order yes Cash on Delivery: Yes Purchase Methods: via Phone & online	Karachi	Yes, as one opens the website, age limit 21
9	Hyderabad Vapers	<a href="http://www.karachivapers.com">www.karachivapers.com</a>	Free Delivery: up to Rs5000 order yes Cash on Delivery: Yes Purchase Methods: via Phone & online	This is Hyderabad branch of Karachi Vapers	
10	Millennium Vapor	<a href="https://www.facebook.com/millenniumvapor1">https://www.facebook.com/millenniumvapor1</a>	Free Delivery: Yes, Cash on Delivery: no	Shop #7, Plaza 181, Ground floor, Main civic center I, Bahria	

Sr.	Name	website	Mode of Selling	City/Address	Age Verification
			Purchase methods: Via phone and outlets	own phase 4, Islamabad	
11	VapeMate	<a href="http://www.vapemate.co.uk">http://www.vapemate.co.uk</a>	Free Delivery: On Orders above Rs6000 or else a flat rate of Rs300. Purchase method: At the outlet, online and via Phone/whatsapp Self-Pickup: Yes, on request. Cash on Delivery: Payment can be made via Direct Bank Transfer, Easy Paisa, UBL Omni, Mobicash, Timepey and Upaisa. (COD will be activated soon)	Shop no 4, Plot no 37-C, Small Shahbaz Commercial, DHA, Phase-VI, Karachi	Yes, as one opens the website
12	Vapor Boyz PK	<a href="http://www.vaporboyz.com/">http://www.vaporboyz.com/</a>	Free Delivery: On orders above Rs4000 Cash on Delivery : Yes Purchase method: online and in store	Multan	Yes, as one opens the website
13	Le-Vap Pk	<a href="http://www.Le-vape.pk/">http://www.Le-vape.pk/</a>	Free Delivery: On orders over Rs5000 Cash on Delivery: Yes Purchase method: Online and via phone 0306-5553827	Lahore	website not working
14	Big Cloud Vaping	<a href="http://www.bigcloudvaping.com">http://www.bigcloudvaping.com</a>	Free delivery: Yes (Islamabad/Rawalpindi only) Nationwide on orders over Rs400	Islamabad	Yes, as one opens the website
15	Vapengine Pk	<a href="http://www.vapengine.pk">www.vapengine.pk</a>	Free Delivery : over purchase of Rs4000 Cash on Delivery: Yes Purchase Method: Through website flat rate of Rs250 will applied.	Self pickup : 41 Commercial area, 4th floor, Cavalry ground, Lahore	
16	Cloud Nation	<a href="http://www.cloudnation.pk">www.cloudnation.pk</a>	Cash on Delivery : Yes Purchase Methods: Online only as of now	8 Km Ferozpur Road Sofiabad Industrial Area, Lahore	Yes, as one opens the website
17	Pak Juices	<a href="http://www.pakjuices.com">www.pakjuices.com</a>	Free Delivery: Only for Karachi but Minimum Order should be Rs5000, Cash on delivery: Karachi only otherwise through Bank Transfer, Easypaisa and Mobicash.	Karachi	Yes, as one opens the website
18	Ejuice Pakistan	<a href="http://www.ejuicepakistan.com">www.ejuicepakistan.com</a>	Free Delivery: On orders over Rs5000 (Within Karachi) Cash on Delivery: Yes Purchase Methods: Online and via phone 03223228802	Karachi	Yes, as one opens the website
19	GreyGorilla Vapor Co	<a href="http://www.ggvapes.com/">http://www.ggvapes.com/</a>	Free Delivery: On orders over Rs5000 Cash on Delivery: Yes Purchase methods: Online, Via outlet and Via call to 0333-2787774	Karachi	Yes, as one opens the website

Sr.	Name	website	Mode of Selling	City/Address	Age Verification
20	Rockstar Vapor	<a href="http://www.rockstarvapor.co/">http://www.rockstarvapor.co/</a>	Free Delivery: On Orders above Rs4000 else a flat rate of Rs300 Self-Pickup: Yes, on request. Cash on Delivery: Payment can be made via Direct Bank Transfer, Easy Paisa, UBL Omni, Mobicash, Timepey and Upaisa.  Via outlet and Via call to 0333-2787774 Purchase methods: Online	Karachi	Yes, as one opens the website
22	Vape House	<a href="http://www.vapehouse.pk">www.vapehouse.pk</a>	Purchase Method : Online Cash on Delivery : Yes Delivery charges : No  Via outlet and via call : 03008962700	9c Ayubbi Comm, Street 4, Phase Vill Ext, DHA Karachi	Yes, as one opens the website
23	Cloud9 Vaping	<a href="http://www.cloud9vaping.co">http://www.cloud9vaping.co</a>	Free Delivery: Orders of Rs5000 or more. Cash on delivery: Yes. Purchase Methods: On Call, Email and Online. Delivery Charges : Rs300 via call 03219235412	Lahore	Does not ask for age verification
24	Vape Therapy	<a href="http://www.vapetherapy.co/">http://www.vapetherapy.co/</a>	Free Delivery: On orders of Rs3500 or above only. Cash on Delivery: Yes Purchase Methods: Online, Via phone and Outlet  Via Call : 0331 3400665	Optimum Motorsports, Ground Floor Building 24-E, Zamzama Lane 4, D.H.A Phase 5, 75500 Karachi, Pakistan	Yes, as one opens the website
25	Vapehex	<a href="http://www.vapehex.com">www.vapehex.com</a>	Free Delivery: No Cash on delivery: Yes Local Pickup: Yes Purchase Methods: On call, Email and Online  Via Call :03343424883	C31, Zamzama Commercial street 6 Phase 5, DHA Karachi	Does not ask for age verification
26	Vapetreat	<a href="http://www.vapetreat.com">www.vapetreat.com</a>	Free Delivery: On orders above Rs2500 else Rs250 (flat shipping rate) Cash on delivery: Yes. Local Pickup: Yes from their outlet Rizwan Arcade, Saddar, Rawalpindi. Purchase Methods: Online, Outlet and Phone.  Via Call : 03111666163	Rawalpindi	Yes, as one opens the website
27	Vaper Vault	<a href="http://www.vapervault.co">www.vapervault.co</a>	Free Delivery: On orders above Rs6000 Cash on delivery: No, Bank Transfer only. Local Pickup: Yes, Contact Ferjad Yousuf for pickup. Purchase Methods: Only through Website  Via Call : 03334111171	Lahore	Does not ask for age verification

Sr.	Name	website	Mode of Selling	City/Address	Age Verification
28	Vape Lab Pk	<a href="http://www.vapelabpk.com">www.vapelabpk.com</a>	Free Delivery: No Cash on delivery: No Local Pickup: Yes, Contact Muhammad Asif for pickup. Purchase Methods: Online Via Website / Whatsapp / Phone Orders / Facebook. Method of Payment: Easy Paisa/ Mobi Cash/ Bank Transfer / Cash on Pick-Up. Via Call : 03343005606	Karachi	Yes, as one opens the website
29	Vape Hut	<a href="http://vapehut.pk">http://vapehut.pk</a>	Free Delivery: Only in Islamabad. Cash on delivery: No, Bank transfer only. Local Pickup: Yes, from Sector I-10/3 in Islamabad and Satellite Town in Rawalpindi Purchase Methods: Online only.	Islamabad/Rawalpindi	website not working
30	Electronic Clouds	<a href="http://www.electronicclouds.co">www.electronicclouds.co</a>	Free Delivery: No. Cash on delivery: Yes. Local Pickup: Yes. Purchase Methods: On call, Email and Online.	Peshawar	website not working
31	Lahore Vaper	<a href="https://www.facebook.com/Lahorevaperz/">https://www.facebook.com/Lahorevaperz/</a>	Free Delivery: On order over Rs2500 otherwise Rs200 delivery charges Cash on Delivery: Only Lahore otherwise direct bank transfer easy paisa mobicash Purchase Methods: Online via website & social network via call	Lahore	website not working
32	Vape Zone Pk	<a href="http://www.VapeZonePk.com">http://www.VapeZonePk.com</a>	Free Delivery: Yes above Rs5000 Cash on delivery: Yes Purchase methods: Online	Online only	website not working
33	Coil Fuel Co.	<a href="http://www.coilfuelco.com">www.coilfuelco.com</a>	Free Delivery: Orders above Rs3000 Cash on delivery: Yes. Purchase Methods: Online only for now (Outlet soon).	Online Only	website not working
34	Big Vapor Pk	<a href="http://bigvaporpk.com">http://bigvaporpk.com</a>	Free Delivery: No. Cash on delivery: No Purchase Methods: Bank transfer, Easy paisa, mobicash ETC.	Lahore	Yes, as one opens the website
35	Tranzax Vapors	<a href="http://www.tranzaxvapors.pk">www.tranzaxvapors.pk</a>	Free Delivery: On orders above Rs3000 Cash on Delivery: Yes Purchase Methods: Online call/whatsapp on 0345-2277766	Karachi	Yes, as one opens the website
36	Safest Cig	<a href="http://www.safestcig.com">www.safestcig.com</a>	Free Delivery: No Cash on Delivery: Yes Purchase Methods: Online, Via phone and Outlets	Sialkot and Karachi	Does not ask for age verification
38	Vape Nation	<a href="http://Vapenation.pk">Vapenation.pk</a>	Free Delivery : Yes Cash on Delivery: Yes	Lahore	Yes, as one opens the website

Sr.	Name	website	Mode of Selling	City/Address	Age Verification
			Purchase Methods: via outlet an via online Call 0300803366		
39	Vape Bazaar	<a href="http://www.vapebazaar.pk">www.vapebazaar.pk</a>	Delivery Charges :Rs195 Cash on Delivery : Yes Purchase Methods : via online and via call 03000778032	Karachi	Does not ask for age verification
40	Vape Center	<a href="https://www.facebook.com/thevapecenter/">https://www.facebook.com/thevapecenter/</a>	Cash on Delivery : Yes Purchase method : via facebook Call 0515731651	Rawalpindi	Does not ask for age verification

## Annex-III- Minimum and Maximum vaping prices

SR	Name	Kit Price Minimum-Maximum		Flavor Price Minimum-Maximum	
1	Vapemall	Rs2500	Rs16200	Rs1200	Rs1200
2	Whitemist Co.	Rs3000	Rs10500	Rs200	Rs2200
3	Artisan Vapor Co.	Rs1100	Rs13719	Rs595	Rs3800
4	E Lite	Rs2200	Rs12500	Rs500	Rs11800
5	Karachi Vapers	Rs3000	12500	Rs1200	Rs3500
6	Le Vap	Rs2700	Rs10500	Rs350	Rs3650
7	Big Cloud Vaping	Rs4500	Rs10000	Rs700	Rs4000
8	Vapengine			Rs1099	Rs3499
9	Cloud Nation	Rs3000	Rs13000	Rs2000	Rs2400
10	Pak Juices			Rs1750	Rs2550
11	Ejuice Pakistan			Rs1950	Rs2750
12	Grey Gorilla	Rs2999	Rs10999	Rs1599	Rs2999
13	Rockstar Vapor			Rs1199	Rs3299
14	Vapehouse	Rs5000	Rs12500	Rs1850	Rs3000
15	Cloud9 Vaping	Rs3000	Rs11500	Rs1600	Rs4500
16	Vape Therapy	Rs2600	Rs10500	Rs2200	Rs3200
17	Vapehex	Rs2300	Rs2600	Rs500	Rs1500
18	Vapetreat	Rs4000	Rs. 11500	Rs1050	Rs2800
19	Vapervault	Rs1850	Rs7300	Rs550	Rs2400
20	Vape Lab Pk			Rs400	Rs2500
21	Big Vapor Pk	Rs2199	Rs11000	Rs299	Rs2700
22	Tranzax Vapors	Rs2350	Rs3650	Rs699	Rs3150
23	Safest Cig	Rs2000	Rs11500		
24	Vape Nation	Rs1000	Rs11500	Rs500	Rs4800
25	Vape Bazaar	Rs999	Rs2999	Rs999	Rs4800

## Annex-IV - Some of the stories in Pakistani media since 2012

Dangers of electronic cigarettes	
Letter to the Editor, Dawn	August 5, 2012
ELECTRONIC cigarettes are battery-operated devices that have been developed as an alternative to normal cigarettes. These are made up of a heater, a battery and a cartridge that contains a solution of propylene glycol, nicotine and some other chemicals.	
<a href="https://www.dawn.com/news/739802">https://www.dawn.com/news/739802</a>	
'Un-Islamic' vaping catches fire in Malaysia amid govt backlash	
Dawn	December 30, 2015
KUALA LUMPUR: At Malaysian e-cigarette outlet Vape Empire, customers kick back and puff out thick, aromatic clouds of vapour in funky flavours like Horny Mango and Creamy Suckerz' Banana Anna.	
<a href="https://www.dawn.com/news/1229644">https://www.dawn.com/news/1229644</a>	
Sale of e-cigarette on rise in twin cities	
Pakistan Observer	June 23, 2016
Islamabad—The sale of Electronic Cigarette is on the rise in twin cities of Rawalpindi and Islamabad being an alternate option for chain smokers to quit smoking.	
<a href="https://pakobserver.net/sale-of-e-cigarette-on-rise-in-twin-cities/">https://pakobserver.net/sale-of-e-cigarette-on-rise-in-twin-cities/</a>	
To vape or not vape	
Dawn	Date: February 27, 2017
ISLAMABAD: The last of the shishas have been extinguished in the capital, but at a swanky new retail outlet in F-11 Markaz, well-heeled men lean over a wood-panelled counter, inhaling what appears to be smoke from small electronic devices. But as they are quick to clarify, it is not smoke, but vapour.	
<a href="https://www.dawn.com/news/1317222">https://www.dawn.com/news/1317222</a>	
Why do people vape? Reasons have changed	
Pakistan Observer	March 3, 2017
THE reasons people use e-cigarettes are shifting: Fewer people are using them to quit smoking, and more people are using them to boost their social image, a new study finds. The findings could have important implications for public health, as they could help guide initiatives seeking to discourage e-cigarette use, the researchers said.	
<a href="https://pakobserver.net/why-do-people-vape-reasons-have-changed/">https://pakobserver.net/why-do-people-vape-reasons-have-changed/</a>	
Electronic cigarette	
Letter to the Editor, Dawn	June 7, 2017
WITH regard to the damage done to health by smoking I wish to clear that the electronic cigarette causes cardiovascular and respiratory problems because these cigarettes carry harmful chemicals, which are toxic to humans and can cause health issues. An increase in nicotine increases the risk of heart diseases.	
The government must totally ban the manufacture and import of cigarettes and tobacco.	
Muhammad Bakhtiyar	
Kech, Turbat	
<a href="https://www.dawn.com/news/1337931">https://www.dawn.com/news/1337931</a>	

Experts warn about consequences of E-cigarettes	
The Nation	Oct 23, 2017
Islamabad - E-cigarettes appear to trigger unique immune responses as well as the same ones that cigarettes trigger that can lead to lung disease, according to a new study.	
<a href="https://nation.com.pk/23-Oct-2017/experts-warn-about-consequences-of-e-cigarettes">https://nation.com.pk/23-Oct-2017/experts-warn-about-consequences-of-e-cigarettes</a>	
Philip Morris to give up cigarette manufacturing	
The Nation	Jan 15, 2018
LAHORE - Global tobacco giant Philip Morris International has announced that its new year's resolution is to give up cigarettes manufacturing.	
<a href="https://nation.com.pk/15-Jan-2018/philip-morris-to-give-up-cigarettes-manufacturing">https://nation.com.pk/15-Jan-2018/philip-morris-to-give-up-cigarettes-manufacturing</a>	
Vaping may boost pneumonia risk: study	
Geo TV	Feb 7, 2018
PARIS: Vaping may help pneumonia-causing bacteria stick to cells lining the airways, likely boosting disease risk, researchers said Thursday.	
<a href="https://www.geo.tv/latest/180863-vaping-may-boost-pneumonia-risk-study">https://www.geo.tv/latest/180863-vaping-may-boost-pneumonia-risk-study</a>	
Vaping may increase risk of pneumonia	
Pakistan Today	Feb 8, 2018
PARIS: Vaping may help pneumonia-causing bacteria stick to cells lining the airways, likely boosting disease risk, researchers said Thursday.	
<a href="https://www.pakistantoday.com.pk/2018/02/08/vaping-may-increase-risk-of-pneumonia/">https://www.pakistantoday.com.pk/2018/02/08/vaping-may-increase-risk-of-pneumonia/</a>	
E-cigarettes- A Gateway To Smoking	
Urdupoint.com	May 9, 2018
In light of recent researches health experts have started to take a closer look at the potential harmful effects of electronic cigarettes, or e-cigarettes, seeing as possible gateway to smoking, which were considered as a safe alternative to smoking.	
<a href="https://www.urdupoint.com/en/health/e-cigarettes-a-gateway-to-smoking-339283.html">https://www.urdupoint.com/en/health/e-cigarettes-a-gateway-to-smoking-339283.html</a>	
Vaping, smoking to cost more this year	
Daily Times	May 27, 2017
ISLAMABAD: Vaping and smoking will become costlier than ever before, as the federal government has announced to increase the prices of e-cigarettes and conventional cigarettes.	
<a href="https://dailytimes.com.pk/9490/vaping-smoking-to-cost-more-this-year/">https://dailytimes.com.pk/9490/vaping-smoking-to-cost-more-this-year/</a>	
E-cigarettes containing nicotine linked to higher risk of heart attacks, strokes	
Saama Tv	September 14, 2017
Many people consider e-cigarettes a healthier alternative to regular cigarettes. But according to a new study, they could increase your risk of heart attack and stroke if they contain nicotine, reported <i>The Independent</i> .	
<a href="https://www.samaa.tv/uncategorized/2017/09/e-cigarettes-containing-nicotine-linked-higher-risk-heart-attacks-strokes/">https://www.samaa.tv/uncategorized/2017/09/e-cigarettes-containing-nicotine-linked-higher-risk-heart-attacks-strokes/</a>	
Switching to e-cigs would delay millions of deaths: study	
Express Tribune	October 3, 2017
A large-scale switch from tobacco to e-cigarettes would cut smoking-related deaths by a quarter in the United States by 2100, even assuming the gadgets are themselves not risk-free, researchers said Tuesday.	
<a href="https://tribune.com.pk/story/1521793/switching-e-cigs-delay-millions-deaths-study/">https://tribune.com.pk/story/1521793/switching-e-cigs-delay-millions-deaths-study/</a>	

UK experts urge smokers to switch to e-cigs for big health gains

Geo TV

Feb 7, 2018

LONDON: Vaping, or using e-cigarettes, poses only a fraction of the health risk of tobacco smoking and should be encouraged among smokers to reap substantial health benefits, British public health experts said on Tuesday.

<https://www.geo.tv/latest/180497-uk-experts-urge-smokers-to-switch-to-e-cigs-for-big-health-gains>

Study seeks ban on promoting e-cigarettes as a safe alternative

Dawn

April 5, 2018

KARACHI: A recent study conducted at five medical institutions highlights how vulnerable students are to the new global epidemic of electronic cigarettes, which they consider relatively safe, though data is emerging on the negative effects of these devices.

<https://www.dawn.com/news/1399571>

'Young people who experiment with e-cigarettes likely to try smoking'

Dawn

August 01, 2018

ISLAMABAD: Young people who experiment with e-cigarettes are more likely to try smoking, a new study says.

<https://www.dawn.com/news/1424079>

Pakistani Professor Says that E-Cigs Are As Deadly As Cigarettes

Vapingpost.com

September 12, 2018

"Multinational tobacco companies believe that their future lies in third world countries, including Pakistan and they are taking advantage of ignorance of people as well as weak laws to keep people addicted to nicotine for the rest of their lives," said eminent pulmonologist and anti-tobacco campaigner Prof Nadeem Rizvi.

Rizvi. <https://www.vapingpost.com/2018/09/12/pakistani-professor-says-that-e-cigs-are-as-deadly-as-cigarettes/>