LONDONASSEMBLY

October 2026

Health Committee

This document contains the written evidence received by the Committee in response to its Call for Evidence, which formed part of its investigation into underage vaping in London.

Calls for Evidence are open to anyone to respond to. In July 2026, the Committee published a number of questions related to its investigation, which can be found on page 2. The Call for Evidence was open from 21 July to 30 September 2026.

Contents

Health Committee 1
Contents 1
Questions asked by the Committee 2
ASH (Action on Smoking and Health) / Ref No. UV001 3
Cancer Research UK / Ref No. UV002 11
London Borough of Hounslow Trading Standards / Ref No. UV003 14
London Youth / Ref No. UV004 19
NCSCT (National Centre for Smoking Cessation and Training) / Ref No. UV005 25
RSPH (Royal Society of Public Health) / Ref No. UV006 30

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Questions asked by the Committee

1. To what extent is underage vaping a problem in London, and what impact is it having on children and young people?

2. What are the main factors driving underage vaping in London and how are young people accessing vapes?

3. What evidence is there about the health impacts of unregulated vaping products?

4. What impact are the measures in the Tobacco and Vapes Act likely to have on underage vaping and the underage use of other nicotine products, such as nicotine pouches, in London?

5. What opportunities and challenges do you foresee in implementing the measures in the Tobacco and Vapes Act related to vaping in London?

Additional questions for London boroughs, Trading Standards professionals and relevant associations.

6. What is your assessment of the scale and nature of underage vape sales in London?

7. What are the main challenges facing local authorities and Trading Standards teams in tackling underage vape sales and the sale of illicit or non-compliant vaping products?

8. What resourcing challenges might London boroughs have in monitoring and enforcing the measures related to vaping and other nicotine products, such as nicotine pouches, in the Tobacco and Vapes Act?

9. What additional support, powers or resources are needed to ensure the successful implementation of the measures related to vaping in the Tobacco and Vapes Act?

Call for evidence: Underage Vaping in London

Action on Smoking and Health (ASH)

Declaration of interests: ASH receives funding for its full programme of work from the British Heart Foundation and Cancer Research UK. We do not have any links with the tobacco industry or any other commercial organisations.

1. To what extent is underage vaping a problem in London, and what impact is it having on children and young people?

The latest ASH Smokefree GB Youth Survey found that in 2026, 19% of 11–17-year-olds had ever tried vaping, 6% were currently vaping and 2% were vaping daily.[1] Most young people have never vaped, and experimentation is the most common pattern of use: 58% of those who have ever vaped reported having done so only once or twice. 3.2% of 11–17-year-olds say they have tried nicotine pouches. Awareness of nicotine pouches has increased in this group, rising from 38% in 2024 to 48% in 2026.[2]

These findings are broadly consistent with other national and regional data sources. The latest NHS England survey of secondary school pupils in England found that 9% of pupils were currently using vapes in 2023 and 25% had ever tried vaping.[3] Data from Wales also show similar levels of youth vaping, with 5.2% of secondary school pupils reporting to vape at least once a week.[4] A 2026 survey of 16,697 14–17-year-olds across 18 Trading Standards areas in the North West found that 24% had ever tried vaping, down from 41% in 2023. Whilst 5% used vapes more than once a week.[5]

While the rapid increase in youth vaping seen between 2021 and 2023 has now stabilised, prevalence remains substantially higher than before the emergence of disposable vapes.[6]

Vaping poses a small fraction of the risks of smoking in the short and medium term.[7] [8] Evidence shows that people who vape are exposed to significantly lower levels of harmful substances linked to cancer, respiratory and cardiovascular conditions than people who smoke. However, vaping is unlikely to be risk-free, particularly over the long term – though the risks are likely to be far lower than for smoking.

Evidence on the impact of vaping on child health is still emerging. Short-term effects can include coughing, headaches, dizziness and sore throats. Research is currently underway to investigate the long term effects. Most vapes contain nicotine which is addictive. Nicotine dependency can make people feel stressed, restless, irritable and unable to concentrate.

The distinction from smoking is particularly important given the scale of harm caused by smoking and exposure to secondhand smoke. ASH's 2026 GB survey of young people found that 5.1% reported being exposed to other people's smoke in their own home, 14.8% in other people's homes and 35.6% when going out to socialise. Exposure was also reported in public settings, including while waiting for public transport (45.3%) and in parks (44.7%).

The Royal College of Physicians estimated that between around 5,000 and 11,000 hospital admissions among children in England were attributable to passive smoking in 2015/16,[9] compared with 40 admissions among under-20s recorded for 'vaping related disorder' in 2022/23.[10]

The US emergence of e-cigarette, or vaping, product use-associated lung injury (EVALI) should not be conflated with the health effects of regulated nicotine vaping products in the UK. The US outbreak in 2019 was strongly related to the use of THC and vitamin E acetate-containing vape products, particularly those obtained from informal sources. The UK Government's evidence review found that there had been no similar lung disease outbreak in England.[11]

2. What are the main factors driving underage vaping in London and how are young people accessing vapes?

The rapid increase in youth vaping from 2021 onwards coincided with the emergence of a new generation of disposable vaping products. These products were relatively cheap, widely available and characterised by bright colours, distinctive designs and a wide range of flavours and flavour descriptors. The 2023 Government call for evidence on youth vaping identified price, product appearance, flavours, retail visibility, marketing and ease of access as important factors contributing to the appeal and uptake of vaping among young people.[12]

The Government's evidence review concluded that the increase in youth vaping appeared to have been driven in particular by the emergence of disposable products, which were relatively inexpensive to purchase and did not require the initial investment associated with reusable devices.

The ban on the sale and supply of single-use vapes from June 2025 addresses one important part of this problem, but the underlying drivers of youth vaping have not disappeared. Reusable and refillable products can still incorporate many of the characteristics that made disposable vapes attractive to young people, including flavours, colourful designs, branding and prominent displays.

In terms of how young people are accessing vapes, in the 2026 ASH Smokefree GB Youth Survey 47% of current vapers aged 11-17 reported buying vapes from shops. A

further 20% obtained vapes from friends or another informal source, while 9% reported buying them online. Young people were most likely to report being given their first vape, with 74% of ever-vapers saying this, primarily by friends.[13]

3. What evidence is there about the health impacts of unregulated vaping products?

There is currently limited evidence on the overall prevalence and composition of the illicit vaping market, and there is no robust estimate of the proportion of vaping products used by young people that are illicit or non-compliant.

There are concerns about the health risks associated with illicit and non-compliant vaping products because their contents may not comply with UK product standards and consumers may not know what they contain.

Research led by the University of Bath tested 1,923 vapes and e-liquids confiscated from 114 schools in England and found synthetic cannabinoids ('spice') in 13% of samples overall. In London and Lancashire, the proportion was around 25%.[14] The researchers also found evidence that products marketed online as THC vapes could contain spice instead.

There have also been reports from London of confiscated vapes containing high levels of heavy metals. The London Assembly has reported testing of vapes confiscated from schools that found levels of lead, nickel and chromium exceeding safe exposure levels.[15]

These findings reinforce the importance of effective regulation, supply-chain controls and enforcement, particularly to prevent illicit products from reaching children.

4. What impact are the measures in the Tobacco and Vapes Act likely to have?

The Tobacco and Vapes Act provides the most important opportunity to address the underlying drivers of youth vaping. Its measures are designed to reduce the appeal, visibility and availability of vaping and nicotine products to children, while maintaining access to vapes as a less harmful alternative for adults who smoke.[16]

The Act provides powers to introduce restrictions on the packaging, appearance and marketing of vaping and nicotine products, alongside restrictions on retail displays. It also strengthens enforcement powers and will introduce a retail licensing scheme in England.

Colours, branding, product appearance, flavours and retail visibility can increase the appeal of vaping to children.[12] Evidence from tobacco control also provides a strong

rationale for applying similar principles to vaping: standardised tobacco packaging and point-of-sale restrictions reduced the visibility and appeal of tobacco products, and so is likely to reduce the appeal of vaping to young people without necessarily reducing the use of products among adult smokers trying to quit.

Standardising packaging and regulating product appearance could also support enforcement. A more consistent and distinctive appearance for compliant products would make it easier for Trading Standards officers to identify products that appear to fall outside the regulatory framework, supporting the identification and removal of illicit and non-compliant products from the market.

The retail licensing scheme is another important opportunity to strengthen enforcement. Licensing would give local authorities greater oversight of the retail market and provide an additional regulatory mechanism for tackling persistent non-compliance.

The Vaping Products Duty is a separate measure from the Tobacco and Vapes Act, introduced through the Finance Act 2026. From 1 October 2026, the duty will apply across the UK to vaping liquids, alongside a Vaping Duty Stamps scheme. The Government has identified reducing the affordability of vaping products among young people and non-smokers as one of the policy objectives of the duty.[17]

The duty and duty-stamp scheme give HMRC a direct enforcement role in the vaping market, providing an additional mechanism for identifying and tackling illicit products and supporting coordination with local enforcement bodies.

5. What opportunities and challenges do you foresee in implementing the measures in the Tobacco and Vapes Act related to vaping in London?

Implementation of the Tobacco and Vapes Act provides an opportunity to:

- reduce the appeal of vaping to children through standardised packaging, product appearance and flavour descriptors;
- reduce children's exposure to vaping and nicotine products through restrictions on retail displays and advertising;
- strengthen controls over the legal supply chain through product registration, duty stamps and retailer licensing;
- improve enforcement against retailers repeatedly selling products illegally;
- strengthen collaboration between Trading Standards, local authorities, schools, public health teams, HMRC, Border Force and other relevant agencies.

There is also an opportunity for Transport for London (TfL) to act ahead of the implementation of the Tobacco and Vapes Act. In 2025/26, TfL reported 56 advertising campaigns in its "Tobacco & Accessories" category. Companies advertising tobacco or nicotine products in this category included Velo, Philip Morris International, Scandinavian Tobacco Group, The Snus Brothers, Blu and Japan Tobacco International. The category generated £1.09 million in gross advertising revenue.[18]

Given the forthcoming statutory restrictions on nicotine-product advertising, TfL should consider proactively ending advertising of vaping and other nicotine products across its estate ahead of the new statutory restrictions.

In terms of challenges, the introduction of new vaping product regulations will involve additional regulatory burden. The Government has already invested in additional Trading Standards capacity and in capacity to enforce the new Vaping Products Duty, which should help address the importation of non-compliant products. However, enforcement capacity will need to be kept under review as the new framework is implemented.

6. What is your assessment of the scale and nature of underage vape sales in London?

There is currently no comprehensive London-wide measure of illegal vape sales. The 2026 ASH Smokefree GB Youth Survey 47% of current vapers aged 11-17 reported buying vapes from shops. A further 20% obtained vapes from friends or another informal source, while 9% reported buying them online.[13]

However, available compliance testing indicates that illegal sales occur at a substantial level. A Chartered Trading Standards Institute rapid review involving 422 test purchases of disposable vapes made by young people found illegal sales in 33% of purchases.[19]

The London Assembly also reported that 77% of underage vapers surveyed said that it was easy to access vapes,[20] indicating that the legal age-of-sale restriction does not currently provide an effective barrier for all young people.

Lessons from tobacco control policy suggest that the most effective way to reduce youth use is through reducing demand. Effective enforcement has an important role to play, but measures to reduce the appeal of products to young people are crucial.

7. What are the main challenges facing local authorities and Trading Standards teams in tackling underage vape sales and the sale of illicit or non-compliant vaping products?

The principal challenges are ensuring Trading Standards teams have sufficient capacity to identify and investigate underage sales and illicit or non-compliant products, and to take effective enforcement action.

The Government has provided an additional £10 million for Trading Standards, including funding expected to support around 80 apprentice enforcement officers, to strengthen enforcement against illicit tobacco and vapes and underage sales.[21] These additional staff should increase local capacity.

The new framework may help address some of these challenges. The Tobacco and Vapes Act provides powers for retail licensing, fixed penalty notices and restricted premises and restricted sale orders for persistent offenders.

Alongside this, the new vaping duty and duty-stamp system should provide additional information to support identification of illicit products and improve visibility of the legal supply chain. Duty stamps incorporate security features and, for digital stamps, a scannable code for authentication and supply-chain tracing.

The new Vaping Products Duty and duty-stamp system will also give HMRC a direct enforcement role in the vaping market. This should provide an additional source of intelligence and enforcement activity to identify illicit products and improve visibility of the legal supply chain.

8. What resourcing challenges might London boroughs have in monitoring and enforcing the measures related to vaping and other nicotine products, such as nicotine pouches, in the Tobacco and Vapes Act?

The Government's impact assessment did not anticipate significant additional enforcement costs from the new legal age-of-sale provisions, noting that local authorities would need to check the same number of businesses as under the existing arrangements.[22]

However, the wider vaping and nicotine product regulations will involve additional regulatory burden. The extent of which will depend on the nature and complexity of the measures brought forward. For London, it will therefore be important to monitor whether existing resources are sufficient once the full range of new measures comes into effect.

The Government has provided additional £10 million funding for Trading Standards to support enforcement of underage and illicit tobacco and vape sales.

9. What additional support, powers or resources are needed to ensure the successful implementation of the measures related to vaping in the Tobacco and Vapes Act?

The Tobacco and Vapes Act provides a strengthened regulatory framework and a range of new powers to support enforcement. The priority should be to ensure that local authorities and Trading Standards teams have the guidance, information, coordination and capacity needed to make effective use of these powers.

1. Clear and timely guidance

Local authorities, Trading Standards teams and retailers should receive clear guidance and sufficient notice of the new requirements, including those relating to packaging, product appearance, flavour descriptors, retail licensing and advertising. This will support consistent implementation and reduce uncertainty for businesses and enforcement bodies.

2. Effective implementation of the retail licensing scheme

The licensing system provides an important opportunity to improve oversight of the retail market and strengthen enforcement against persistent non-compliance. The scheme should be designed to support effective enforcement and intelligence gathering, rather than simply creating an administrative register. Local authorities should have access to the information and tools needed to identify licensed retailers, monitor compliance and take action against persistent offenders.

3. Continued intelligence and data sharing

Continued intelligence and data sharing between Trading Standards, HMRC, Border Force, police, public health teams and other relevant agencies will be important. Information generated through the vaping duty and duty-stamp system should be used, where appropriate, to improve visibility of the legal supply chain and support the identification of illicit products.

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[1] Use of vapes and other novel tobacco and nicotine products among young people in Great Britain - ASH
[2] https://ash.org.uk/key-topics/nicotine-pouches
[3] https://digital.nhs.uk/data-and-information/publications/statistical/smoking-drinking-and-drug-use-among-young-people-in-england/2023
[4] https://phw.nhs.wales/reports/vaping-and-smoking-amongst-learners-in-year-7-to-11-in-wales-2/
[5] https://www.trafford.gov.uk/news/2026/survey-shows-fewer-under-18s-are-vaping-smoking-and-drinking-trafford
[6] Use of vapes and other novel tobacco and nicotine products among young people in Great Britain - ASH
[7] Nicotine vaping in England: 2022 evidence update summary - GOV.UK
[8] e-cigarettes-and-harm-reduction_full-report_updated_0.pdf
[9] Hiding in plain sight: Treating tobacco dependency in the NHS | RCP
[10] [ARCHIVED CONTENT] Hospital admissions for vaping related disorders - NHS England Digital
[11] https://www.gov.uk/government/publications/vaping-in-england-evidence-update-march-2020/vaping-in-england-2020-evidence-update-summary

[12] https://www.gov.uk/government/calls-for-evidence/youth-vaping-call-for-evidence/outcome/youth-vaping-call-for-evidence-analysis
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[14] https://www.bath.ac.uk/announcements/up-to-1-in-4-vapes-confiscated-in-schools-contains-spice-and-these-are-pushed-on-social-media
[15] https://www.london.gov.uk/who-we-are/what-london-assembly-does/london-assembly-work/london-assembly-publications/underage-vaping-london
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[18] https://tfl.gov.uk/corporate/transparency/freedom-of-information/foi-request-detail?referenceId=FOI-0109-2627
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[20] Who has the power to tackle underage vaping? | London City Hall
[21] More officers on streets to smoke out illicit tobacco and vapes - GOV.UK
[22] https://bills.parliament.uk/publications/60065/documents/6289

Cancer Research UK's response to London Assembly Health Committee – Call for evidence: underage vaping in London

Tobacco

Tobacco remains the biggest cause of cancer and cancer death in the UK.[i] It is responsible for around 160 cancer cases every day in the UK. Cancer Research UK has been campaigning for a Smokefree UK, and as part of that, we have called on the UK Government to prevent people from starting smoking, and to help those who smoke to quit.

The new Tobacco and Vapes Act is a world-leading piece of legislation that will help prevent people from ever starting smoking. It will gradually raise the age of sale of tobacco so that people born on or after 1 January 2009 will never legally be sold tobacco. This will help to create the first ever smokefree generation. It is important that this legislation is now implemented and effectively enforced (which requires adequate funding for enforcement agencies like local trading standards staff).

Vapes

While tobacco is the biggest cause of cancer in the UK, research so far shows that legal vapes are far less harmful than smoking and are an effective tool to quit smoking. But as we don't yet know the long-term effects of vaping it cannot be considered risk-free so children and young people should not use them.[ii]

Data from ASH show that in 2026, 19% of 11–17-year-olds had ever tried vaping, 6% were currently vaping with 2% vaping daily (GB).[iii] Most young people have never vaped, and experimentation is the most common pattern of use. These findings are broadly consistent with other national and regional data sources. The latest NHS England survey of secondary school pupils in England found that 9% of pupils were currently using vapes in 2023 and 25% had ever tried vaping (UK).[iv]

The introduction of modern disposable vapes around 2020 marked a shift in the market. Their low cost, ease of use, attractive design and widespread promotion contributed to growth in vaping, including among young people and adults who had never regularly smoked.

The UK Government is already taking steps to address youth vaping. As of 1 June 2025, disposable vapes are banned; after the announcement of the ban, disposable usage fell. The vaping product duty, coming into force on 1 October

2026, will increase the price of vapes, which could further help to reduce their appeal to young people.

The Tobacco and Vapes Act also includes measures that will help to reduce the appeal and visibility of vapes to children and young people.

We therefore support the powers in the Tobacco and Vapes Act to further regulate vapes, including some of the UK Government's proposals on packaging, displays and certain flavour descriptors. We believe that these measures will most directly target the appeal and accessibility of vapes to children and young people.

However, given that vapes are an effective and appealing smoking cessation tool for adults who smoke, we are mindful of the potential for unintended consequences of any regulations. That is why CRUK recommends that any new vape regulations strike the right balance between reducing appeal and accessibility to children and young people, while ensuring they remain an appealing and accessible stop smoking tool for people who smoke.

For example, exacerbation of the misperception that vaping is as or more harmful than smoking - which are already prevalent among both young people and adults - could deter adults who smoke from using vapes as a smoking cessation tool and encourage them to continue using the far more harmful product. Evidence shows that vape packaging, flavours, and displays are part of the appeal of vapes as a smoking cessation tool to adults who smoke, and this therefore needs to be considered in any new measures.

There are many measures within the Tobacco and Vapes Act, as well as the vape duty and disposables ban which will reduce the appeal and access of vapes. It is important that regulatory vape measures are accompanied by robust monitoring and evaluation, to ensure measures do not unintentionally reduce the appeal and accessibility of vapes to adults as a smoking cessation tool or widen health inequalities. We support ongoing monitoring and evaluation of new regulations to ensure they are helping to reduce the appeal of vapes to young people, without closing off access to adults who smoke.

Advertising of nicotine pouches

The Tobacco and Vapes Act will ban the advertising of all tobacco, vape, nicotine products, from 1 June 2027. This will help to reduce the visibility and appeal of products to children and young people.

CRUK recommends that Transport for London set a positive example, by stopping allowing adverts for nicotine pouches (where there is no evidence of their role as a smoking cessation tool) on the tube even sooner.

Enforcement

Effective enforcement is vital to ensuring legislation has the impact that the Government intends, and local trading standards play an important role in this.

For all new tobacco and vape regulations – including the Tobacco and Vapes Act, disposable vapes ban, and vaping products duty – it is crucial that funding for trading standards staff is adequate. The London Assembly should make this case to the Treasury ahead of the forthcoming Spending Review.

CRUK supports the policy in the Tobacco and Vapes Act to allow Trading Standards Staff to take action against those who break new laws, and that they will be given powers to implement fixed penalty notices for these breaches.

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[i] Brown, K.F., Rumgay, H., Dunlop, C. et al. The fraction of cancer attributable to modifiable risk factors in England, Wales, Scotland, Northern Ireland, and the United Kingdom in 2015. Br J Cancer 118, 1130–1141 (2018). https://doi.org/10.1038/s41416-018-0029-6

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[iii] Use of vapes and other novel tobacco and nicotine products among young people in Great Britain - ASH

[iv] NHS. Smoking, Drinking and Drug Use among Young People in England, 2023. Accessed September 2026. Available here: https://digital.nhs.uk/data-and-information/publications/statistical/smoking-drinking-and-drug-use-among-young-people-in-england/2023

Written evidence: underage vaping in London

Submitted by London Borough of Hounslow Trading Standards

28 September 2026

1. To what extent is underage vaping a problem in London, and what impact is it having on children and young people?

Underage vaping is a significant and persistent problem in London. The capital has a high density of retail premises, which makes vaping products widely available and easy to reach.

Rising business costs and commercial pressures have led some retailers to look for extra income, and in some cases, this includes selling vaping products to children. Officers have also seen a "trusted person" model develop, where one young person buys vapes for their peers. One young person in Hounslow told us: *"There is no point in doing underage sales as they won't sell, as you do not have a trusted person."* This suggests that access is being controlled through peer networks, which can create informal hierarchies among young people with some features associated with gang culture.

As a result, children and young people have several routes and locations through which they can get vaping products. This raises the risk of uptake and creates ongoing challenges for enforcement and public health.

Officers also note that some businesses treat seizures of counterfeit and illicit cigarettes and vapes as "business as usual". Current sanctions do not appear to act as an effective deterrent.

2. What are the main factors driving underage vaping in London, and how are young people accessing vapes?

Access

Young people get vaping products in three main ways:

- **Retail sales:** Trading Standards regularly carries out underage test purchase operations, and some of these result in successful sales. This shows that several businesses are prepared to ignore age restrictions. Where no sale is made, this may reflect retailers being more cautious when they suspect enforcement activity, rather than consistent compliance, and retailers have confirmed this in the Borough that they know the 'tactics of the Council'.
- **Proxy purchasing:** Some retailers who refuse direct sales to children may still allow access indirectly through "trusted" purchasers buying on behalf of younger people.
- **Online and peer-to-peer supply:** Vapes are sold through social media, both by online businesses and private sellers. Partners and local intelligence also report vapes being sold and passed between pupils in schools, including at break times and in toilets where supervision is limited. This has been confirmed by students from numerous schools across the Borough.

Motivation

Surveys of young people in Hounslow found that they vape because of peer pressure and the wish to belong to a group, the appeal of the colours and flavours, and wanting to look “cool”. Social media reinforces this. Young people describe influencers and celebrities showing vaping tricks, such as smoke rings, and promoting particular products.

Taken together, retail and peer-to-peer supply make vapes easy to get hold of. This undermines efforts to reduce youth vaping and calls for a coordinated approach to prevention, education and enforcement across schools, enforcement agencies and public health.

3. What evidence is there about the health impacts of unregulated vaping products?

The Service has received one first-hand account from someone who unknowingly used an unregulated vaping product. They became unwell and needed hospital assessment, including an ECG. Their symptoms lasted several days before improving.

Since then, the person has stopped vaping altogether. They said they no longer felt confident they could tell whether a product met regulatory standards. Although this is a single case, it shows the potential health risks of unregulated products and how such experiences affect consumer trust and behaviour.

4. What impact are the measures in the Tobacco and Vapes Act likely to have on underage vaping and the underage use of other nicotine products, such as nicotine pouches, in London?

Feedback from young people suggests the measures in the Tobacco and Vapes Act are likely to have a positive impact. Young people support stricter regulation. They say vaping products are currently too accessible, too visible, and marketed in ways that appeal to children, particularly through bright packaging, prominent displays and sweet flavours.

London’s high density of retail premises will continue to make access a challenge. However, restrictions on advertising, packaging, display and flavour descriptions should reduce the appeal and visibility of these products and contribute to lower youth uptake over time.

How well the legislation works will depend on enforcement. Trading Standards will need to continue intelligence-led activity, including retailer inspections, test purchasing and underage sales enforcement. Experience shows that a relatively small number of businesses repeatedly break the law, and enforcement should stay focused on these persistent offenders.

Close working with partner agencies, including Planning, Immigration Enforcement, HMRC and Border Force, will also be important in tackling the wider criminality linked to the supply of illicit nicotine products. A coordinated approach is likely to be a stronger deterrent and improve compliance across the sector.

5. What opportunities and challenges do you foresee in implementing the measures in the Tobacco and Vapes Act related to vaping in London?

Opportunities

The Act is a significant opportunity to reduce youth vaping and improve young people's health. It also gives local authorities, Trading Standards, the police, public health and other agencies a platform for more coordinated work on the wider community and quality-of-life issues linked to illicit tobacco and vapes.

Challenges

- **Business understanding and compliance:** Hounslow has many retail businesses that rely on casual or temporary staff. These staff may have little training, briefing or language support, which makes it harder for them to understand and follow new legal requirements. They may also have little say over business practices and may feel pressured to follow instructions that go against the law. When visiting premises, those who are working there have little or no understanding of the regulations, breaches and any consequences.
- **Partner awareness:** Agencies such as the Metropolitan Police Service and London Fire Brigade may come across illicit tobacco and vapes during their normal duties, but these are not always treated as priorities, so enforcement opportunities are missed. In one recent Hounslow case, a vehicle was stopped carrying a substantial quantity of counterfeit cigarettes, illicit vapes and nitrous oxide. Because the relevant powers were not understood, the goods were not seized, even though information was obtained about where they were going. Better awareness and training across partner agencies would help make sure such opportunities are acted on.
- **Resourcing:** Implementing the Act will need ongoing retailer engagement, compliance visits, test purchasing, inspections and enforcement action. Many local authority teams already carry heavy caseloads and backlogs. More proactive work will uncover more breaches and lead to more investigations and prosecutions. Sustained investment will be essential if the legislation is to deliver its full benefits.
- **A shift to online supply:** As restrictions in shops increase, sales and promotion are likely to move to online platforms and closed social media groups. Trading Standards will need specialist capability in digital investigation, online monitoring and intelligence gathering to keep pace with these changes and continue protecting young people from nicotine addiction.

6. What is your assessment of the scale and nature of underage vape sales in London?

Underage vape sales in Hounslow are widespread and happen through several channels. Test purchase operations continue to result in sales, for example the last set of visits to premises, resulted in 10 seizures of illicit tobacco and vapes, out of 14 retailers visited.. Alongside direct retail sales, supply increasingly happens through proxy purchasing by "trusted" individuals, social media sellers and peer-to-peer selling in schools. Because this activity is less visible, test purchasing alone is likely to underestimate the true scale of the problem.

Schools and educational institutions are ignoring the students vaping and selling in the toilets, and often refuse to acknowledge a problem amongst their students, and have accused Trading Standards of 'wanting to scare students, when there is not a problem'.

7. What are the main challenges facing local authorities and Trading Standards teams in tackling underage vape sales and the sale of illicit or non-compliant vaping products?

The rising cost of living is putting financial pressure on both businesses and consumers. For some retailers, the profit from underage and illicit sales outweighs the perceived risk of enforcement, especially where penalties are seen as low or seizures as a routine cost of doing business.

Demand is also a challenge. Consumers, including young people, are drawn to cheap products, and the warning “if it’s too good to be true, it probably is” does not appear to discourage them from buying illicit or counterfeit vapes.

Education facilities such as schools in the Borough, are often reluctant to accept there is an issue of vaping in their school. This is despite young people telling Trading Standards ‘Everyone vapes in the toilets’ ‘People sell vapes in the toilets at breaks’.

The challenge is for Education to work with Trading Standards and partners to increase awareness for both students and parents and carers.

Courts not imposing steeper fines and penalties to those who sell illicit tobacco and vapes and sell underage. Retailers see this as part of business costs, and one retailer said ‘We go out and do it all again the next day’.

8. What resourcing challenges might London boroughs have in monitoring and enforcing the measures related to vaping and other nicotine products, such as nicotine pouches, in the Tobacco and Vapes Act?

- **Capacity:** Enforcement teams are already stretched. The new measures will add inspection, test purchasing, investigation and prosecution work without a matching increase in staff or funding.
- **Partner engagement:** The police and other partners have competing, higher priority demands, so illicit tobacco and vapes are often not treated as a priority.
- **Training and awareness:** Partner agencies do not always understand the legislation or the powers available, which limits joint working and leads to missed enforcement opportunities.

9. What additional support, powers or resources are needed to ensure the successful implementation of the measures related to vaping in the Tobacco and Vapes Act?

Stronger engagement from schools would make a real difference. Schools can help by recognising the extent of the issue and working with Trading Standards and partners to educate children and young people. Schools are also a valuable source of intelligence about local supply, which can help direct enforcement activity.

Digital expertise – Vapes and nicotine products can be purchase online and via third-party sources. Investment to have digital intelligence expertise is essential to focus on blocking the supply chain.

Further support from agencies to make an impact and deter businesses. Following on, the courts need to impose greater penalties to disrupt the activity of those selling vapes and nicotine products underage.

Tara Doyle

Tobacco Control and Engagement.

Underage vaping in London

Written submission from London Youth to the London Assembly Health Committee — September 2026

About London Youth

London Youth is a charity on a mission to champion and strengthen youth organisations across London, so more young people have the opportunities and skills they need to succeed. We do this alongside our network of around 600 youth organisations across the capital, who support more than 600,000 young Londoners across every borough, focusing on young people facing barriers to opportunity.

This submission sets out London Youth's assessment against questions 1 to 5. It draws on the direct testimony of young Londoners on our Youth Board, who responded to the Committee's questions in their own words. Where we quote young people below, the words are theirs. Quotations are unattributed, and the submission is made on behalf of London Youth.

1. To what extent is underage vaping a problem in London, and what impact is it having on children and young people?

National prevalence data captures how many young people vape. It does not capture how normalised vaping has become in some of the settings where young people spend their time, and it is that normalisation our evidence speaks to.

ASH's 2026 survey finds that 19% of 11 to 17-year-olds have tried vaping, 6% currently vape and 2% vape daily, with regular vaping having plateaued at 4%. What young people describe to us sits alongside these figures rather than contradicting them: vaping as an unremarkable feature of the school day, in classrooms, toilets and playgrounds, with devices shared openly between pupils and conversations about which vape to buy next forming part of ordinary peer conversation. One Youth Board member described children beginning as young as nine; another described constantly overhearing discussions about "what next vape" someone was going to buy.

The distinction matters for the Committee's recommendations. While the proportion of young people vaping may have plateaued, this does not necessarily mean that vaping has become less visible or less embedded in the everyday experiences of those who vape, or that the nicotine dependence experienced by some young people has reduced.

One Youth Board member also highlighted the shift towards rechargeable devices, describing how these become an everyday possession that young people repeatedly use and recharge "like a phone". Given the shift towards rechargeable devices, the Committee may wish to consider whether a policy focus on disposable vapes remains sufficient to address the products now being used by young people.

The impact is educational as well as clinical

A significant consequence raised by young people is nicotine dependence, and the effects they describe reach beyond health. Youth Board members reported addiction preventing young people from concentrating at school, and contributing to mental health difficulties.

If that is right, it has implications for how London responds. A young person managing nicotine cravings through a school day is an attendance and attainment issue as much as a health one. At present it is frequently treated as a behaviour issue instead, a point we return to under question 5.

2. What are the main factors driving underage vaping in London, and how are young people accessing vapes?

Drivers

The drivers young people describe are distinct from one another and will not respond to a single intervention. We would group them as follows.

- **Having nothing else to do.** The first reason one Youth Board member gave was that young people vape "just to have something to do". We do not claim a causal link between youth service provision and vaping, however this does reinforce the importance of considering underage vaping alongside young people's access to positive activities, trusted adults and safe places to go, rather than treating it solely as a question of retail enforcement.
- **Environment and peer pressure.** Young people identified their immediate environment and peer group as an important factor in whether someone becomes involved, and described an active social cost for refusing: those who decline are labelled. If the pressure to start is social and comes from people a young person knows, there is a case for interventions delivered through trusted relationships alongside those delivered at scale.
- **Vaping in place of eating.** One contributor reported seeing young people vape instead of eating. We cannot assess how widespread this is, but it is sufficiently concerning that services working with young people should be alert to it.

Access

Local retailers were repeatedly identified as a source of access. One contributor described the commercial logic plainly: "because corner shops want to make money, they're selling it to the youth."

One detail from our Youth Board is worth the Committee's specific attention. Shops near schools, we were told, would sell to teenagers:

> *"…as long as they weren't in uniform."*

This suggests that some retailers may have been using school uniform as a proxy for age rather than consistently checking identification. We would encourage the Committee to explore whether Trading Standards intelligence and test purchasing approaches capture practices of this kind. The young person concerned was describing current practice, ahead of the relevant provisions of the Tobacco and Vapes Act coming into force on 29 October 2026. Whether implementation changes this behaviour is exactly the sort of question that should be tested afterwards.

Young people also raised two other ways they can get vapes. One Youth Board member was concerned that AI tools could make it easier for young people to create convincing fake ID, including passports, to buy vapes from local shops. We have not independently verified how widespread this is, but it raises questions about whether current age-checking systems are able to respond to new technology, particularly while AI tools can still be used to create fake identification. Separately, young people described vapes being passed between them, including in schools, which is directly relevant to question 5.

3. What evidence is there about the health impacts of unregulated vaping products?

London Youth is a youth-focused VCS infrastructure organisation, rather than a health body, and we do not provide clinical evidence. What we can offer is evidence about the information environment in which young Londoners are making decisions, which we believe is a finding in its own right.

What our Youth Board responses do illustrate is the difficulty young people face in distinguishing between the established risks of vaping, the additional risks associated with illicit or unregulated products, and claims about vaping that are not supported by current evidence.

Young people's understanding of vaping is mixed. One Youth Board member cited BBC News coverage and the NHS website, and concluded that what she had read indicated a public health emergency for children arising from toxic chemicals and unknown long-term risks. Others named cancer and anxiety as the harms they associate with vaping. Alongside this, others told us that young people are simply not being educated on the dangers, and that there is not enough medical support to inform them.

This is consistent with the wider picture. ASH's 2026 survey found that 62% of 11 to 17-year-olds inaccurately believe vaping is as harmful as – or more harmful than – smoking, against the evidence the Committee itself cites, which suggests vaping poses a small fraction of the risks of smoking in the short to medium term while long-term effects remain unknown.

There are two points here. First, young people can misunderstand the risks in different ways. Someone who believes vaping is no worse than smoking may not see a reason to avoid either. Second, the specific risk the Committee is asking about, illicit and unregulated products of unknown composition, is precisely the distinction young people are least equipped to make;

because it requires knowing not only that vaping carries risk but that some products carry considerably more.

We would therefore encourage the Committee to treat clear information for young people as a substantive recommendation rather than an afterthought to enforcement, delivered through sources they trust and in the settings where they already are.

4. What impact are the measures in the Tobacco and Vapes Act likely to have?

London Youth supports the measures in the Act. Our substantive point is that the Act addresses supply, and supply is only part of the problem. We would highlight three things.

Enforcement parity

Young people's clearest ask was that age verification for vapes should carry the same weight as it does for alcohol and tobacco. Current arrangements were described to us as "half-hearted laws" that people are "still slipping by". Whether the Act changes that will depend less on the provisions themselves than on enforcement capacity, which question 5 addresses.

The young people who are already dependent

London Youth supports restricting young people's access to vapes and nicotine products, and nothing in this section should be read as arguing for delay or dilution. Our point is that restriction on its own is incomplete.

A young person who is already nicotine-dependent does not stop being dependent when supply is restricted. One Youth Board member was clear about what is missing:

"There needs to be youth-friendly initiatives that support rehabilitation after a young person has decided to give up vaping or no longer has access to it."

She went on to note that withdrawal symptoms are well documented, and that they need to be planned for if restrictions are to hold in the long term. We agree. For a dependent fifteen-year-old, restriction without support leaves a health need unmet rather than solving it.

We would encourage the Committee to establish what youth-appropriate cessation support currently exists across London boroughs, and to recommend that tighter restrictions are accompanied by accessible support for young people who are already nicotine-dependent.

Substitution

We welcome the Committee having nicotine pouches and similar products in scope. Young people describe vaping as the most easily available source of nicotine rather than the only one, and the Committee should monitor whether tighter restrictions on vape access lead to substitution towards other nicotine products.

5. What opportunities and challenges do you foresee in implementation?

Challenges

- **Peer-to-peer distribution.** The most serious unintended consequence young people identified, and the one we would most encourage the Committee to plan for.

  "This act may also create more opportunities for young people to distribute things like vapes and other similar products among themselves. Which can put them in a vulnerable position, especially if they're already addicted."

This is a young person describing her own peer group, and it identifies a potential unintended consequence of tighter retail restrictions: supply moving away from regulated premises and towards informal distribution between young people, where there is no oversight and where those involved are themselves exposed. We would encourage the Committee to recommend that boroughs monitor for this explicitly.

- **Age verification technology.** As set out under question 2, young people raised AI-generated identification as an emerging route around age checks. We cannot speak to prevalence, but a regime resting on visual inspection of documents will need to keep pace until AI-generation software has the safeguards in place to recognise such user behaviour.
- **Resistance from those already dependent.** Young people expect 16 to 18-year-olds to push back, and were clear about why: because they are currently addicted. Withdrawal, rather than simple defiance, may be a driver, and a response designed only around defiance is unlikely to work.
- **Commercial resistance and enforcement capacity.** Young people expect resistance from retailers and distributors with a financial stake, and think there are more of them than is generally assumed. Whether licensing bites will depend on borough Trading Standards capacity, which the Committee is right to examine under questions 7 to 9.

Opportunities

- **Change how schools respond.** This is the clearest opportunity available to the Mayor and boroughs. Young people described schools that "advocate for teenagers' health" but, on finding a pupil vaping, respond by "placing them in isolation rather than sitting them down and advising them on ways to help stop the child from the addiction". A young person who is nicotine-dependent and placed in isolation is still dependent, and has now also missed lessons. Schools need a referral route to cessation support, not only a sanction.
- **Use the youth sector as delivery infrastructure.** The young people most affected are often those least likely to engage with formal health services and most likely to be known to a youth worker they trust. London Youth's network of around 600 organisations already reaches them, in the settings where this behaviour occurs. It is an existing route for both prevention and cessation support.

- **Involve young people in designing the response.** Our Youth Board engaged with this call for evidence readily and with considerable insight. A London-wide response designed with young people will be more effective than one designed for them, and we would be glad to convene that.

Recommendations

- **Ensure tighter restrictions are accompanied by youth-appropriate cessation support.** Designed for under-18s, delivered in settings young people already use, and covering withdrawal. We would encourage the Committee to establish what currently exists across London boroughs as a first step. This would address an important gap alongside the Act's supply-side measures.
- **Fund prevention through trusted relationships.** Youth organisations can reach young people who may not be reached by health campaigns.
- **Support schools to move from sanction to support,** with a clear referral route when a young person is found vaping.
- **Get clear information to young people where they already are,** developed with them, and addressing the misperception that vaping is as harmful as smoking, as well as the additional risks of illicit products.
- **Ask Trading Standards whether test purchasing accounts for the uniform workaround,** and ensure enforcement of age verification carries parity with alcohol and tobacco.
- **Monitor displacement** to nicotine pouches and, in particular, to peer-to-peer supply as retail access tightens.
- **Build direct youth engagement into this investigation.** London Youth can convene this through our Youth Board and member network of youth organisations.

London Youth would be glad to give oral evidence or to connect the Committee directly with young Londoners and member organisations. Contact: Callum Delhoy, Public Affairs and Policy Manager, **callum.delhoy@londonyouth.org**

London Assembly Health Committee Consultation
Evidence Response from the NCSCT Sept 2026

1. To what extent is underage vaping a problem in London, and what impact is it having on children and young people?

Establishing the prevalence of vaping in those under 18 is difficult at a national level, let alone at a more local level e.g. London. This is due to the lack of availability of rigorous and reliable population level survey data that reflects the most recent time period, and the age range being considered.

The most recent national survey monitoring vape use in young people is the NHS 2023 Smoking, Drinking and Drug Use among Young People in England Survey, published in October 2024[1]. This survey only includes 11–15-year-olds and is conducted on average every 2 years. According to this latest survey most young people do not vape, only 9% reported *current* vaping, the same as in 2021[1].

Action on Smoking and Health (ASH) run annual surveys (conducted by YouGov) which also monitor the use of nicotine vapes by young people, but in the wider age range of 11–17-year-olds. In their most recent survey published in July 2026[2], 19% reported *ever* using a vape, (rates which have plateaued since 2023) and 6% (down slightly from the previous year) reporting they are *currently* vaping. Rates of use are higher in the 16–17-year-old groups than 11–15-year-old groups. For 11–15-year-olds, only 4% report *current* vaping. ASH data also indicate that *regular* (more than once a week) vaping in 11–17-year-olds has also plateaued since 2023 at 4%, and only 2% of 11–17-year-olds report vaping *daily*.

However, what is of more concern is in the same cohort *ever* smoking is still at 18% (a rise from 14% in 2023), with 4.8% of young people *currently* smoking.

At national level it therefore appears that whilst perceptions of the number of young people vaping are high, the data indicates that most young people do NOT vape and regular use is low, and more importantly, have not shown increases in recent years, if anything there are indications it may be declining, whereas smoking (which has significantly greater harms) in this cohort is still prevalent but receives less attention in this age group. It needs to be acknowledged that rates of both vaping and smoking are higher in sub-groups such as those in care, neurodivergent, with mental health problems, behavioural problems, those in social housing and other socially deprived groups.

Any survey data reflecting more local level prevalence rates of vaping needs to ensure it is representative of the population it is sampling (in this case under 18s) and weighted accordingly to provide an accurate estimation of the rates of vaping. Consideration needs to also focus on the differentiation between 'ever', 'current' and 'regular' use with standardised definitions, to allow for valid comparisons, and record smoking tobacco rates, to get an understanding of the relative harms. We are currently not aware of any London population level survey data that provides such reliable data.

2. What are the main factors driving underage vaping in London and how are young people accessing vapes?

   At a national level, most (74%) of 11–17-year-olds report being given their first vape from a friend, which is not illegal under the current regulations. Only 1.4% say they were given their first vape by an e-cigarette company[2]. Even for 11–15-year-olds who *currently* vape the majority report being given vapes mainly by friends[1]. Forty-seven percent of 11-17-year-old *current* vapers purchase vapes from a shop, 20% from informal sources and only 9% get them vapes online[2].

   ASH survey responses have consistently indicated over the last few years that, the main reason 11–17-year-olds reported for why they vape, or had vaped, was to 'Just to give it a try', followed by 'Other people use them, so I join in' and 'I like the flavours'[2]. These response reasons were the same distribution regardless of whether they had ever smoked.

   It appears that peers are therefore influential in vape initiation and use, but it is possible that vape use and reasons for use can change over time (even within a short time period – 6 months). Evidence suggests that initial use is often driven by pleasure and social reasons, rather than the nicotine, but continued use is not necessarily socially driven and has been reported to be because they want to reduce their tobacco use[3].

   As with data on prevalence rates, we are not aware of any rigorous data on factors driving use and accessing vapes in specific localities such as London. There is evidence on specific factors driving vaping (and indeed smoking and other substance use) in specific sub-populations e.g. LBGTQ+[4].

3. What evidence is there about the health impacts of unregulated vaping products?

   Evidence on the health impacts of unregulated vaping products in the UK in particular, is minimal. There is some evidence that a sample of unregulated vapes (those seized by trading standards for being non-compliant and not permitted to be sold in the UK) contained varying and frequently high levels of hazardous metals including cadmium, copper, nickel and lead. These are known to have significant adverse effects on human health, when they accumulate in the body over time, with the suggestion that young people and pregnant woman may be more at risk[5]. Additionally, evidence suggests that synthetic cannabinoids are a common adulterant in unregulated vape products, albeit this was one small sample volunteered by one individual[6].

4. What impact are the measures in the Tobacco and Vapes Act likely to have on underage vaping and the underage use of other nicotine products, such as nicotine pouches, in London?

The Tobacco and Vapes Act 2026 contains a clear, multi-layered set of measures specifically designed to reduce vaping among young people[7]. The core idea is to make vapes less accessible, less appealing, and less visible to under-18s, while tightening enforcement against illegal supply. It introduces a universal under-18 sales ban for all vapes and nicotine products (which includes nicotine pouches), prohibits free samples and vending machine sales, and bans advertising and sponsorship from 2027. It gives government powers to restrict flavours, packaging, device designs, and retail displays that attract young people, reinforces the existing disposable vape ban, and allows vape-free zones around schools and playgrounds. Stronger enforcement—through fixed penalties, retailer licensing, and tougher action on illicit vapes—along with tighter controls on online sales, aims to further reduce the routes through which young people obtain vapes.

However, whilst these measures will potentially make vapes (and other nicotine products) less attractive and harder to access, whether there will be an impact of reduction in underage use remains to be determined.

Current evidence suggests these measures will have some impact on the appeal of vapes for young people[8-12], whether this translates to usage will remain to be seen. Use of vapes in this age group is already stabilising[2], before any of the additional measures of the Act have been implemented.

It does need to be acknowledged that young people (under 18s) are already circumventing the law, by acquiring cigarettes and vapes at present, often by proxy-purchases or via illegal sources or channels which are illegally selling to under 18s. For some, who have developed a high dependence on nicotine, they are likely to continue to seek nicotine through other means i.e. illegal sources, different products, return to smoking, or will need support in managing nicotine withdrawal. The NCSCT have provided guidance for working with young people who are nicotine dependent and looking for support to either stop smoking[13] and/or vaping[14], and the general principles would apply to any other nicotine-only products.

5. What opportunities and challenges do you foresee in implementing the measures in the Tobacco and Vapes Act related to vaping in London?

The largest challenge we foresee will be compliance and enforcement of the measures once implemented, and managing any unintended consequences. Whilst the measures will aim to reduce young people initiating cigarette and vape use, consideration needs to be given to those young people who are already using and have developed a nicotine dependence and experience nicotine withdrawal symptoms upon cessation. For these individuals, without appropriate support to manage withdrawal effectively, they are likely to acquire vapes, other products e.g. cigarettes, pouches or even other substances to meet their nicotine needs. These are more than likely to be unregulated products and acquired through channels that put the young people at even greater risk.

Consideration is therefore needed with regards to what appropriate and proportionate support could be put in place for these young people, which doesn't penalise them and minimises these unintended consequences. However, any response needs a

measurable, evidence based and balanced response considering the numbers of young people actually regularly using and in response to the relative harms.

Another key challenge London is understanding the impact of vaping on young people, including unregulated use, associated risks and harms, and the wider behavioural consequences. As noted earlier, there is currently no London-based population survey that provides rigorous and reliable monitoring of young people's behaviour. Establishing such a survey would offer an important opportunity to generate representative data that services, local policymakers, and commissioners can use to inform evidence-based decisions that accurately reflect the London population, rather than relying on secondary analyses of national survey data.

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29 September 2026

Response to the London Assembly Health Committee Call for Evidence: Underage Vaping in London

About RSPH

The Royal Society for Public Health (RSPH) is the world's oldest public health charity, working across the UK and internationally to influence public health policy and improve health outcomes. We are home to a global community of over 6,500 members working across a wide range of disciplines, professions and settings to help people lead healthier lives.

1. To what extent is underage vaping a problem in London, and what impact is it having on children and young people?

Underage vaping is a significant and growing public health concern. Evidence shows that almost one in five children aged 11-17 have tried vaping and around 6% currently vape, with rates increasing significantly between 2021 and 2023 during the growth of disposable vape products.

While evidence consistently shows that vaping is significantly less harmful than smoking and remains an important smoking cessation tool for adults, there are still risks to health outcomes associated with vaping. The long-term health effects of vaping are still not fully understood, and there is particular concern about nicotine addiction among children and young people. Young people are more at risk to the effects of nicotine because their lungs and brains are still developing, and further evidence suggests that teenage exposure to nicotine makes the brain more vulnerable to future addiction to other drugs

Beyond physical health concerns, the normalisation of vaping among young people risks creating a new generation addicted to nicotine. Evidence increasingly suggests that vaping can become embedded in daily routines, contributing to dependency and reinforcing behaviours associated with nicotine consumption. For many young people who have never smoked, vaping is not functioning as a cessation aid but rather as a route into nicotine addiction.

While vaping should remain available as a harm reduction tool for adult smokers, any proposed policies must ensure that products designed to support smoking cessation do not become attractive lifestyle products for children and young people.

2. What are the main factors driving underage vaping in London and how are young people accessing vapes?

Several factors contribute to be rising rates of youth vaping including product design, packaging, flavours and marketing. Together, these have raised the appeal of vaping products among young people. Evidence demonstrates that brightly coloured packaging, novelty branding, attractive flavours and visually appealing product designs can increase the attractiveness of vaping products to children and young people.

Visibility in shops continues to expose young people to vaping products. Research has shown that retail settings remain among the most common places where young people regularly encounter promotions on vaping products, with more than half of young people reporting

seeing these products or related marketing in shops. Product displays can reinforce social norms around vaping and contribute to more experimentation and higher uptake if young people are continuously exposed to them in their local environments.

Underage access remains a big challenge. Although sales to under-18s are illegal, evidence suggests that illegal sales remain widespread. The high availability of these illicit products only further exacerbates this problem. These products are often sold through retailers operating outside regulatory requirements, which also raises the risk of a higher prevalence of lower quality unregulated products flooding the nation which can lead to worsening health outcomes. However, due to the value that vapes have as a smoking cessation tool, we must ensure that there remains a clear differentiation between the way we enforce the restriction of these products. This will ensure that we appropriately target retailers that are actively promoting to, and selling vaping products to, children instead of vaping shops that are complying with regulations and are supporting cessation.

We also believe that the density of retail shops and the high concentration of vape shops - which are often also located in areas of higher deprivation which also contributes to rising inequalities in health - near schools and locations frequented by young people contribute to more exposure and easier accessibility. Local authorities should have greater oversight of where vape retailers are located, particularly around areas where young people frequent, such as schools and colleges.

3. What evidence is there about the health impacts of unregulated vaping products?

Unregulated vaping products pose significant risks to public health. Evidence demonstrates a growing concern regarding products containing high nicotine concentrations, missing health warnings and potentially harmful contaminants. Reports of confiscated products containing unsafe levels of metals such as lead, are especially concerning.

Unlike regulated vaping products, illicit products may not comply with established safety standards, making it more difficult for consumers to understand what substances they are inhaling. This increases potential exposure to harmful chemicals.

For children and young people, who are particularly vulnerable to the effects of nicotine dependence, the risks associated with unregulated products can be especially severe. We must ensure strong enforcement which effectively targets illicit products which is an essential component of our collective efforts to reduce youth vaping.

Conclusion

We believe that underage vaping has become a significant public health issue that requires sustained action from national government, local authorities, schools, public health organisations and enforcement agencies. While vaping remains an important smoking cessation tool for adult smokers, the growing uptake among children and young people is concerning and risks creating a new generation addicted to nicotine.

The Tobacco and Vapes Act 2026 presents a major opportunity to strengthen protections for children and young people through more effective licensing, enforcement and restrictions on

product visibility and appeal. However, the long-term success of the legislation will depend on the right enforcement capacity, sufficient resources for local authorities and Trading Standards teams, and robust monitoring of outcomes.

We encourage the Government, the Mayor of London and London boroughs to work together to ensure its effective implementation as part of a comprehensive and holistic approach to reducing youth vaping and improving population health.

ENDS