A significant number of youth are using electronic cigarettes (e-cigarettes), which provide a relatively new way to deliver the addictive substance nicotine without burning tobacco. The number of youth using e-cigarettes is alarming and raises serious concerns that e-cigarettes could be an entryway to nicotine addiction and use of regular cigarettes for some kids. While it is still an open scientific question whether e-cigarettes might be able to help adult smokers give up cigarettes, kids should not be using any tobacco product, including e-cigarettes. In December 2018, the Surgeon General issued an advisory on e-cigarette use among youth, declaring the growing problem an epidemic. The Surgeon General called for “aggressive steps to protect our children from these highly potent products that risk exposing a new generation of young people to nicotine.”

**E-Cigarette Use Among Youth**

According to the National Youth Tobacco Survey (NYTS), released by the U.S. Centers for Disease Control and Prevention (CDC) and the Food and Drug Administration (FDA), e-cigarettes have been the most commonly used tobacco product among youth since 2014. In 2018, 20.8 percent of high schoolers and 4.9 percent of middle schoolers reported current use of e-cigarettes. From 2017 to 2018, e-cigarette use increased by an alarming 78 percent for high schoolers and 48 percent for middle schoolers. Over 3.6 million high school and middle school students currently use e-cigarettes. The increase in e-cigarette use has driven a 38 percent increase in use of any tobacco product among high school students (from 19.6 percent in 2017 to 27.1 percent in 2018).

The same survey found that among those students who had used e-cigarettes in the past 30 days in 2018, 27.7 percent of high schoolers and 16.2 percent of middle schoolers were frequent users of e-cigarettes, using e-cigarettes on at least 20 of the preceding 30 days. This amounts to more than 900,000 middle and high school students who were frequent users of e-cigarettes.

Data from the 2015 NYTS shows that 13.1 percent of high school students who have never used another tobacco product have tried e-cigarettes. Similar patterns exist for young adults; the 2014 NHIS data found that nearly 10 percent of 18 to 24 year olds who have never smoked cigarettes had tried an e-cigarette.

There is concern that use of e-cigarettes may function as a gateway to the use of more dangerous, combustible tobacco products. In 2016, the Surgeon General concluded that while more research is needed, evidence from several longitudinal studies suggests that e-cigarette use is “strongly associated” with the use of other tobacco products among youth and young adults, including conventional cigarettes. Reviewing a more recent and larger evidence base, a 2018 report by the National Academies of Science, Engineering and Medicine (NASEM) found the effect of e-cigarette use on cigarette smoking initiation to be causal, concluding that “There is substantial evidence that e-cigarette use increases risk of ever using combustible tobacco cigarettes among youth and young adults.” The NASEM report also concluded, “There is moderate evidence that e-cigarette use increases the frequency of subsequent combustible tobacco cigarette use” among youth and young adults. In addition, several studies find that the link between e-cigarette use and smoking initiation was stronger for those who had lower risk factors for smoking at baseline. In 2018, the Surgeon General declared that “any e-cigarette use among young people is unsafe, even if they do not progress to future cigarette smoking.”

The e-cigarette marketplace continues to change rapidly. According to the 2015 NYTS, the majority (53.4%) of youth e-cigarette users report using a rechargeable or refillable e-cigarette. Recently, sales of e-cigarettes shaped like flash drives that have replaceable nicotine pods (such as JUUL) have...
increased dramatically and are reported to be popular among youth and young adults.\textsuperscript{11} According to the 2018 Monitoring the Future Survey, more than 60\% of 10\textsuperscript{th} grade students say it is easy to get vaping devices and e-liquids.\textsuperscript{12}

**Flavored E-Cigarettes Attract Youth**

The 2016 Surgeon General report stated that, "E-cigarettes are marketed by promoting flavors and using a wide variety of media channels and approaches that have been used in the past for marketing conventional tobacco products to youth and young adults."\textsuperscript{13} Cigarettes with specific characterizing flavors were prohibited in the U.S. on September 22, 2009, as part of the Family Smoking Prevention and Tobacco Control Act. However, this prohibition did not apply to other tobacco products, including e-cigarettes, which come in flavors with obvious youth appeal such as gummy bear, cotton candy, and fruit punch.\textsuperscript{14} As of 2017, researchers had identified more than 15,500 unique e-cigarette flavors available online.\textsuperscript{15} An earlier study of e-cigarette flavors found that among the more than 400 brands available online in 2014, 84 percent offered fruit flavors and 80 percent offered candy and dessert flavors.\textsuperscript{16} In addition to the vast selection available online, thousands of “vape” shops have now opened throughout the country that allow consumers to sample and purchase refill liquids, including a combination of flavors chosen by the user.\textsuperscript{17} 

Research shows that flavored products are not only popular among youth, but may play a role in initiation and uptake of tobacco products. Data from FDA’s 2013-2014 Population Assessment of Tobacco and Health (PATH) survey found that 81 percent of youth aged 12-17 who had ever used e-cigarettes had used a flavored e-cigarette the first time they tried the product, and that 85.3 percent of current youth e-cigarette users had used a flavored e-cigarette in the past month. Moreover, 81.5 percent of current youth e-cigarette users said they used e-cigarettes "because they come in flavors I like."\textsuperscript{18} While the methodology is not comparable to the PATH study, the 2018 NYTS found that 67.8 percent of high school e-cigarette users had used a flavored e-cigarette in the past month, an increase from 60.9 percent in 2017. Current use of menthol or mint flavored e-cigarettes among high school e-cigarette users also increased from 42.3 percent in 2017 to 51.2 percent in 2018.\textsuperscript{19}

**E-Cigarette Marketing Reaches and Appeals to Youth**

The Surgeon General concluded that, "Themes in e-cigarette marketing, including sexual content and customer satisfaction, are parallel to themes and techniques that have been found to be appealing to youth and young adults in conventional cigarette advertising and promotion."\textsuperscript{20} By mimicking the tobacco industry’s strategies, including celebrity endorsements, slick TV and magazine advertisements, and sports and music sponsorships, e-cigarette advertising has effectively reached youth and young adults. The 2016 NYTS found that 78.2 percent of middle and high school students—20.5 million youth—had been exposed to e-cigarette advertisements from at least one source, an increase from 68.9 percent in 2014.\textsuperscript{21} Another study found that 82 percent of 12-17 year olds and 88 percent of 18-21 year olds reported seeing e-cigarette advertising in 2015.\textsuperscript{22} The investment in e-cigarette marketing has been coupled with an increase in use among youth and young adults. A 2016 study in Pediatrics, analyzing 2014 NYTS data, found that exposure to e-cigarette advertising is associated with current e-cigarette use among youth and that greater exposure to e-cigarette advertising is associated with higher odds of use.\textsuperscript{23}

Unlike cigarette and smokeless tobacco companies, e-cigarette companies are not currently required to report their marketing and promotional expenditures to the U.S. Federal Trade Commission (FTC), so the exact amount spent to advertise and promote these products is uncertain. However, e-cigarette marketing expenditures are estimated to have increased dramatically in the early years, from $12 million in 2011 to $125 million in 2014.\textsuperscript{24} Other studies have also documented this significant increase in spending.\textsuperscript{25} These figures likely underestimate the true extent of e-cigarette advertising, as the available marketing data are not comprehensive (e.g., social media and sponsored events—strategies widely used by numerous e-cigarette companies—are not included).

An investigative report released in April 2014 by 11 members of Congress\textsuperscript{26} provided detailed evidence that e-cigarette manufacturers resurrected the marketing practices used by tobacco companies for decades to attract kids to smoking— including some tactics that have been prohibited for tobacco companies precisely because they appealed to kids. While cigarette advertising has been absent from TV
and radio since 1971, TV advertising was the second highest tracked marketing expense among e-cigarette manufacturers in 2014. According to the Truth Initiative report, expenditures on e-cigarette television advertising totaled $25.5 million in 2014. These ads were strategically targeted to reach youth through network placement on television stations with clear youth appeal such as Comedy Central, ABC Family and MTV. A study in *Pediatrics* found that from 2011 to 2013, exposure of youth aged 12-17 to e-cigarette advertisements on TV increased by 256 percent. This same study estimated that e-cigarette advertisements may have reached an audience of up to 24 million youth. Research shows that these ads are effective—a randomized trial exposing adolescent e-cigarette non-users to such ads showed that they led to 50 percent higher intentions to use e-cigarettes.

In addition, youth are exposed to e-cigarette marketing at the point of sale. In 2012, nearly one-third of retailers sold e-cigarettes, with availability greatest in convenience stores and drug stores. According to the 2016 NYTS, over two-thirds (68.0%) of middle and high school students had been exposed to e-cigarette advertisements in retail stores, the most common source of exposure to e-cigarette marketing.

Other tactics used by e-cigarette manufacturers to reach youth have included magazine ads that reach youth audiences; sponsorships and free samples at youth-oriented events such as auto races and music festivals; celebrity spokespeople who depict e-cigarette smoking as glamorous; and sweet, kid-friendly flavors with names like Cherry Crush, Chocolate Treat, Gummy Bear and Cotton Candy. The Congressional report found that many of the e-cigarette companies have also used social media to promote their products. E-cigarette companies market extensively on product websites and maintain a strong presence on social media sites popular among youth, like Facebook, YouTube, Instagram, and Twitter. One study found nearly 74,000 tweets about e-cigarettes in just a two month period, most of which were sent by a few commercial enterprises. E-cigarette manufacturers have also placed ads on search engines and websites that focus on music, entertainment, and sports and which often have substantial youth and young adult audiences. The companies rarely take steps to effectively prevent access to these websites by minors, as evidenced by data from the 2016 YTS, which found that 40.6 percent of high school students had been exposed to e-cigarette advertisements online. Another research study found that 40 percent of teens (ages 13-17) had seen e-cigarette advertisements online always, most or some of the time.

**Health and Public Health Concerns**

Under the right circumstances, e-cigarettes could benefit public health if they help significantly reduce the number of people who use conventional cigarettes and die of tobacco-related disease. However, many questions remain about the long-term health effects of these products and their effectiveness in helping smokers quit. While we have much to learn about these new products, the evidence is already clear that it is unsafe for young people to use e-cigarettes or any other product containing nicotine.

As stated by the Surgeon General, "E-cigarette use poses a significant – and avoidable – health risk to young people in the United States. Besides increasing the possibility of addiction and long-term harm to brain development and respiratory health, e-cigarette use is associated with the use of other tobacco products that can do even more damage to the body."

**Poisoning and Exposure to Liquid Nicotine.** Delivered in high doses, nicotine can be lethal. The Surgeon General's report and the NASEM report both found that contact with e-liquids can cause adverse health effects and ingesting e-liquids can lead to death. Exposure to liquid nicotine found in e-cigarettes has resulted in thousands of calls to poison control centers in recent years, peaking in 2014, according to the American Association of Poison Control Centers (AAPCC). In 2014, more than half of these calls to poison hotlines were to report exposures among children under the age of six. To begin to address the poisoning risk that e-cigarettes and liquid nicotine pose to young children, in 2016 Congress passed the Child Nicotine Poisoning Prevention Act, which gave the Consumer Product Safety Commission authority to enforce

<table>
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<th>Year</th>
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<tr>
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* Preliminary data, as poison centers continue to update their reports.
child resistant packaging standards for e-cigarette products. This law went into effect in July 2016.

**E-cigarette ingredients and constituents.** There is insufficient research on the long-term effects of using e-cigarettes, which involves regular inhalation of nicotine, glycerin or some other solvent, and other additives. According to the Surgeon General, “E-cigarette aerosol is not harmless. It can contain harmful and potentially harmful constituents, including nicotine.” The nicotine present in e-cigarette aerosol is absorbed by users and bystanders. Studies have found other chemicals and toxins present in some e-cigarettes, including formaldehyde, acrolein, volatile organic compounds like toluene, tobacco-specific nitrosamines, and metals like nickel and lead. These compounds are generally present at levels much lower than in cigarette smoke, although the compounds themselves are found on FDA’s list of harmful or potentially harmful substances. A study of current adolescent e-cigarette users and dual users (e-cigarettes and cigarettes) found significantly higher levels of volatile organic compounds, some of which are carcinogenic, in those users compared to non-users. Of note, similar levels of some these compounds were found in users of non-nicotine e-cigarettes, increasing the concern that even non-nicotine e-cigarettes increases exposure to harmful chemicals. Because FDA has just begun to regulate e-cigarettes, which are available in hundreds of different brands, there is no way for consumers to know for sure what is in the products or the aerosol.

In addition, while some of the other substances, such as flavorings, used in e-cigarettes might be labeled as “generally recognized as safe,” some researchers as well as the organization primarily responsible for granting that designation have noted that it applies to ingestion, not for other exposures such as inhalation. The NASEM report committee expressed concern about flavor additives because even to-date, they “have not been widely tested for sensitizing, toxic, or irritating potency.” In its 2016 report, the Surgeon General stated that, “while some of the flavorings used in e-cigarettes are generally recognized as safe for ingestion as food, the health effects of their inhalation are generally unknown” and noted that some of the flavorings found in e-cigarettes have been shown to cause serious lung disease when inhaled. An article in the *Journal of the American Medical Association* raised concerns that the chemical flavorings found in some e-cigarettes and e-liquids could cause respiratory damage when the e-cigarette aerosol is inhaled deeply into the lungs.

**Impact of Nicotine.** E-cigarettes and refill liquids contain widely varying levels of nicotine, and the nicotine delivered through the aerosol can also vary depending on the device characteristics and user practices. While e-cigarettes can be used for non-nicotine products, including marijuana, more than two-thirds of youth e-cigarette users report using e-cigarettes exclusively for nicotine-containing products. Nicotine is a highly addictive drug that can have lasting damaging effects on adolescent brain development and has been linked to a variety of adverse health outcomes for the developing fetus. Nicotine also impacts the cardiovascular system. The Surgeon General concluded that, “The use of products containing nicotine poses dangers to youth, pregnant women, and fetuses. The use of products containing nicotine in any form among youth, including in e-cigarettes, is unsafe.”

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14 See U.S. Food and Drug Administration’s Flavored Tobacco webpage at http://www.fda.gov/TobaccoProducts/GuidanceComplianceRegulatoryInformation/FlavoredTobacco/default.htm


Electronic Cigarettes and Youth

30 Farrelly, M. A Randomized Trial of the Effect of E-cigarette Television Ads on Intentions to Use E-Cigarettes. Presentation at the FDA “Electronic Cigarettes and the Public Workshop,” June 1, 2015.