UK Vaping Industry Association

Response to Tobacco and Vapes Consultation: packaging, appearance and display

The UK Vaping Industry Association (UKVIA) welcomes the opportunity to respond to this consultation.

UKVIA represents manufacturers, distributors and retailers across the UK vaping sector. Our members share the objective of reducing smoking prevalence while ensuring that vaping products are not accessed or used by individuals under the age of 18.

Smoking remains the leading cause of preventable illness and death in the UK. Evidence consistently shows that vaping products are substantially less harmful than combustible cigarettes and can support adult smokers in quitting. Public policy should therefore distinguish clearly between smoking and vaping in order to support harm reduction while protecting children and vulnerable groups.

The UKVIA has no members with connections to the tobacco industry.

Restricting the colour on packaging for all vaping and nicotine products

We propose that the packaging for vaping and nicotine products should be white.

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

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

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

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

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

-

UKVIA supports proportionate measures to prevent vape packaging being designed in ways that disproportionately appeal to children. However, we disagree that the evidence currently justifies restricting every visible part of every vaping packaging to a single white colour.

The Government's consultation recognises that vaping is less harmful than tobacco products and can be an effective way for adult smokers to quit, while making clear that children and adult non-smokers

should never vape. Regulation should reflect that distinction. If policy makes vaping packaging look less acceptable, less familiar and less attractive to adult smokers, it risks undermining the very harm reduction pathway that has helped many smokers move away from combustible tobacco.

There is also a lack of evidence that limiting packages to white would materially reduce youth vaping. Youth access is already illegal and should be addressed through enforcement.

Youth uptake is influenced by a wider range of factors than colour alone, including discreetness, social norms and the tendency of young people to emulate behaviours they observe among peers and adults. A regulatory approach focused principally on requiring packaging to be white therefore risks addressing the appearance of a product's packaging without addressing characteristics such as product size, concealability and the broader social drivers of youth use.

Package appearance also has legitimate adult functions. Colour, finish and design help adult consumers distinguish between products, identify brands, recognise product types and select products that suit their preferences. Removing this differentiation would reduce consumer choice, impose redesign and manufacturing costs, and disproportionately affect legitimate packaging manufacturers and independent retailers already facing significant regulatory pressure.

The Regulatory Policy Committee has also noted that DHSC should strengthen causal evidence and reflect uncertainty, while recognising both reducing youth vaping and maintaining vaping as a smoking-cessation aid as policy objectives.

UKVIA therefore recommends a more targeted approach. Government should prohibit demonstrably youth-oriented, novelty, fluorescent, multicoloured or entertainment-style presentation, while undertaking comparative testing before prescribing an exclusive national colour palette.

Regulation should target features demonstrated to create youth appeal without unnecessarily removing functional design or reducing the attractiveness of lower-risk alternatives to adults who smoke.

The wider package of proposals already includes restrictions on devices, flavour descriptions, product information and retail display. Taken together, these measures risk making regulated vaping products less visible, less understandable and less appealing to adult smokers, while doing too little to tackle the illegal market.

-

Restricting flavour descriptions on vaping and nicotine products packaging

Single lead flavour

We propose to restrict flavour descriptors on the packaging for vaping and nicotine products to a single, recognised flavour name, like apple or strawberry. This would include restricting hyphenated or combined flavour names, such as blueberry-apple.

Do you agree or disagree with our proposal to restrict flavour descriptors on the packaging of all vaping products to a single lead flavour?

- Agree
- Neither agree nor disagree

- Disagree
- Don’t know

Do you agree or disagree with our proposal to restrict flavour descriptors on the packaging of all nicotine products to a single lead flavour?

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

Concept, sensory, food and drink categories

We also propose restricting any concept or sensory words from being used to describe a flavour.

A concept name refers to any flavour name that does not directly describe a recognisable food, drink or natural flavour. Instead, the word conveys a mood, an idea, a brand or even a number or codename, rather than describing an actual flavour. This could include flavour names such as:

- ‘Unicorn Dream’
- ‘DC100’

A sensory name refers to a recognisable taste, smell or sensation experienced when using a vape or nicotine product, such as ‘Mint Blast’.

Do you agree or disagree with our proposal that concept and sensory flavour descriptors should be restricted on the packaging of all vaping products?

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

Do you agree or disagree with our proposal that concept and sensory flavour descriptors should be restricted on the packaging of all nicotine products?

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

We also propose restricting descriptor names of certain food and drink categories that appeal to children and young people. This includes flavours like:

- confectionery and sweets (such as ‘Chocolate’, ‘Candy’ and ‘Bubblegum’)
- desserts and cakes (such as ‘Brownie’ and ‘Cheesecake’)
- alcohol and other drinks (such as ‘Cola’)

Do you agree or disagree with our proposal that confectionery, sweets, dessert and cake name descriptors should be restricted on the packaging of all vaping products?

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

Do you agree or disagree with our proposal that confectionery, sweets, dessert and cake name descriptors should be restricted on the packaging of all nicotine products?

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

Do you agree or disagree with our proposal that alcohol and drink name descriptors should be restricted on the packaging of all vaping products?

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

Do you agree or disagree with our proposal that alcohol and drink name descriptors should be restricted on the packaging of all nicotine products?

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

Please explain your answers. This could include, for example, your views on any elements of the proposal that you disagree with and why, or any flavour names that you believe should or should not be restricted. You may also wish to comment on whether there should be any differences in how these restrictions apply to vaping and nicotine products. (Optional, maximum 600 words. Please do not include any personal information in your response.)

-

UKVIA supports the Government's objective of reducing the appeal of vaping and nicotine products to children and young people. However, we do not support the proposed blanket restrictions as drafted. The categories combine plainly youth-oriented descriptors with terms that provide factual information to adult consumers, and the evidence cited does not establish that every descriptor has the same effect on youth appeal.

The consultation recognises that vaping can help adults stop smoking and that flavours can support quitting. It also relies on Taylor et al. (2025), which tested simplified factual descriptors, such as "blueberry and raspberry" in place of stylised names, and found reduced youth appeal without evidence that adult smokers were deterred. This supports proportionate simplification, not a blanket prohibition on sensory, confectionery, dessert or drink-related descriptors.

UKVIA supports restricting clearly youth-directed concept names and presentation, such as "Unicorn Dream", "fairy floss", references to youth culture or video games, imitation of confectionery brands, and wording designed to evoke children's products. This is consistent with UKVIA's existing Packaging, Labelling and Flavour Name Guidance.

However, factual sensory descriptors such as "cooling", "fresh" and "ice" communicate characteristics that a lead flavour alone may not convey and can help consumers avoid products containing flavour characteristics to which they are sensitive or intolerant. Likewise, "blueberry raspberry", "mint chocolate", "vanilla custard" and "coffee caramel" describe materially different flavour profiles. Reducing these to a single generic descriptor risks confusion and removes useful information.

Research involving 20,836 adult frequent e-cigarette users in the United States found substantial variation in specific flavours used and in patterns of use over time, supporting the view that consumers value specific flavours and combinations rather than only broad categories.[1]

The same proportionality should apply to food and drink descriptors. Terms such as "chocolate", "coffee", "cola", "brownie" and "cheesecake" are mainstream flavour descriptions. The test should be whether a particular name, presentation or brand association is disproportionately likely to appeal to children, not simply whether the flavour is familiar to them. Comparable age-restricted sectors, including alcohol, routinely use sensory descriptors while focusing regulation on underage sales and youth-directed marketing.

The principles should be consistent across vaping and other nicotine products, but the evidence base should be assessed separately; findings for vaping should not automatically justify identical restrictions for nicotine pouches or other products.

A single-descriptor rule could also operate as a de facto flavour restriction. If manufacturers cannot accurately describe complex flavours, they may be discouraged from offering them and consumers may be less willing to purchase them. This matters for smoking cessation: UKVIA-supported research found that 100% of stop smoking services providing vaping products offered flavoured options, including fruit, mint/menthol and dessert variants, with fruit among the most popular choices for smokers attempting to quit.[2] The Royal College of Physicians has likewise described flavours as an integral part of vaping's effectiveness as a quit aid.

UKVIA therefore supports restrictions on youth-oriented concept branding, but disagrees with limiting products to a single flavour descriptor or banning broad categories of flavour names. Such measures risk reducing useful consumer information, indirectly restricting flavours and undermining tobacco harm reduction.

[1] Russell C, McKeganey N, Dickson T, et al. Harm Reduction Journal. 2018;15:33.
[2] Fearon IM, Millar J, Dunne J, Murphy M. Cureus. 2026;18(6).

-

Product information on and inside vaping and nicotine products packaging

We propose that the packaging of all vaping and nicotine products should have:

- a full list of ingredients, including flavour agents
- expiration details
- an age restriction symbol, for example a crossed-out 18 symbol
- a standardised display of nicotine strength, for example in milligrams, millilitres or as a percentage
- nicotine delivery per puff or pouch, where relevant

We also propose that relevant products should have a nicotine warning label on the front and back of the packaging. For example, this warning could say 'This product contains nicotine which is a highly addictive substance'. Packaging should also have clear instructions on appropriate waste disposal.

Where applicable, we propose that certain products have an instruction leaflet to inform users of any appropriate warnings and the adverse effects of nicotine.

Do you agree or disagree with our proposal to require the consumer information listed above on and inside the packaging of all vaping products?

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

Do you agree or disagree with our proposal to require the consumer information listed above on and inside the packaging of all nicotine products?

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

Please explain your answers. This could include, for example, sharing comments on any elements of the proposal that you disagree with and why, if there are areas that you feel could be further strengthened or areas that have been missed and should be included. (Optional, maximum 600 words. Please do not include any personal information in your response.)

-

UKVIA agrees with the principle of requiring clear, accurate and consistent consumer information on vaping and nicotine products. Consumers should be able to identify what a product contains, its nicotine strength, age restriction, relevant warnings, expiry information and how it should be disposed.

For nicotine-containing vaping products, many of these requirements are already mandated under the Tobacco and Related Products Regulations 2016, including ingredient disclosure, nicotine content

and delivery information, nicotine addiction warnings, and the provision of an information leaflet. As such, any additional requirements should recognise that nicotine itself is not unique to vaping products and is also used in licensed medicinal products. Regulatory approaches should therefore reflect the fact that the primary distinction between these products is the method of nicotine delivery, rather than the nicotine itself.

UKVIA supports a clear age-restriction symbol, appropriate expiry information, standardised nicotine-strength labelling and clear disposal instructions. Standardisation should make information easier to compare, not simply increase the volume of mandatory text. Requirements should specify consistent units and terminology and ensure that important information remains legible, particularly on smaller packs.

We support transparent ingredient information, including flavouring ingredients, provided that Government establishes clear and technically workable rules for how ingredients must be named and presented. Requirements should provide consumers with meaningful information while avoiding inconsistent terminology or unnecessarily duplicative statements.

Particular care is required with the proposal to state “nicotine delivery per puff”. Nicotine delivery is not a fixed characteristic of a vaping product and will vary from person to person, depending on factors including nicotine concentration, device power, coil characteristics and individual puff duration. Any single figure could therefore give a misleading impression of precision or consistency. Unless highly prescriptive testing and usage conditions were mandated, the only reliable information manufacturers can provide is the nicotine content and composition of the product itself.

Nicotine warnings should be accurate, prominent and consistently applied to products containing nicotine. However, implementation should avoid unnecessary repetition where the same mandatory warning already applies under existing legislation.

Overall, UKVIA supports stronger and more consistent consumer information. Final regulations should be developed with appropriate technical standards, consumer testing and industry engagement so that the information presented is accurate, comprehensible and genuinely useful rather than simply increasing packaging complexity.

-

Time allowed to implement new packaging requirements

If and when new requirements are introduced, manufacturers will need time to update their packaging to be compliant. Retailers may also need time to sell old stock that does not comply with the new law.

There should be a long enough notice period before new requirements come into force. This period would start from when the details of the new requirements are made clear. We have not yet decided what is the best way to share those details, but it could be, for example, in a government response to this consultation or when regulations are presented to the relevant national Parliament.

We propose a minimum notice period of 12 months would be enough. This would mean all products in scope of our vaping and nicotine product packaging proposals would need to comply with any new regulatory requirements by the end of a 12-month implementation period. However, a longer or shorter notice period may be needed, and we welcome views on this.

Do you agree or disagree with our proposed implementation period of no less than 12 months (from when the detail of any new requirements is clear)?

- Agree

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

Please explain your answer. This could include, for example, sharing comments on whether the proposed implementation period should be shorter or longer, or on implications that the proposed implementation period could have for manufacturers, retailers or other groups. Please reference any evidence that you have considered to support your response. (Optional, maximum 600 words. Please do not include any personal information in your response.)

-

UKVIA agrees that there should be no less than 12 months from the point at which the final requirements are clear. However, 12 months should be treated as a minimum regulatory floor rather than an assumption that every packaging change can reasonably be implemented within that period.

The implementation clock should start only when manufacturers have complete and legally reliable technical specifications. A government response indicating policy intent should not trigger the period if important matters remain unresolved in regulations, statutory guidance or technical standards. Businesses need certainty over matters such as permitted packaging format, dimensions, colours, fonts, warnings, flavour descriptors, ingredient presentation, nicotine information and any leaflet requirements before artwork, compliance review, printing and production can be finalised.

There is a significant practical reason for this. The Regulatory Policy Committee’s August 2026 opinion on DHSC’s vaping and nicotine packaging options records an estimated Equivalent Annual Net Direct Cost to Business of £74.5 million for the preferred option and an estimated net present value of -£641 million. Identified costs include redesign and manufacturing, familiarisation, training, reconfiguration, leaflet production, transaction costs and profit loss. The RPC also specifically recognises appropriate lead-in time as a mitigation enabling businesses to produce compliant packaging and sell through existing stock.

A transition must therefore address both manufacture and retail inventory. Products that were lawfully manufactured, imported or placed on the market before the compliance date should not automatically become unsaleable overnight. Retailers, particularly small independent businesses, do not control manufacturing lead times and may hold lawful stock purchased many months earlier. Requiring this stock to be written off would impose costs not only on individual retailers, but across wholesalers, manufacturers and the wider supply chain.

It could also create unnecessary environmental impacts. Without an appropriate sell-through period, otherwise usable products could require disposal solely because their packaging no longer complied with the new requirements. In the case of vaping products, this could mean unnecessary disposal or reprocessing of devices and batteries, alongside the associated collection, recycling and waste-management costs. A proportionate transition should avoid creating additional waste where products were lawfully produced and supplied before the new requirements took effect.

UKVIA recommends a clear sell-through or grandfathering provision for lawfully acquired stock, alongside the manufacturing transition. Government should also consider a longer period where final requirements require substantial packaging redesign, new testing, supply-chain changes or coordinated implementation across multiple product categories.

Implementation should additionally be coordinated with other regulatory changes affecting the same businesses. The consultation itself recognises the need to consider sequencing and cumulative effects. This is particularly important where packaging changes interact with Vaping Products Duty, duty stamps, device requirements, retail-display restrictions and future licensing obligations.

UKVIA supports clear regulatory timelines and early publication of detailed guidance. However, any transition period should reflect the scale of the proposed changes and provide sufficient time for businesses throughout the supply chain to adapt in a practical and cost-effective manner.

-

Vape device appearance

Restricting the colour and finish of vapes

We propose restricting the colour of vape devices, including all visible parts, to:

- white, black or grey, with only one of those colours per device
- a matt finish
- no variation in shades or opacity

Do you agree or disagree with our proposal to limit the colour of a vaping device (including all visible parts) to white, black or grey with a matt finish?

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

Do you agree or disagree that vape devices should be banned from having cosmetic lights? This would not apply to functional lights, such as those that indicate charge level.

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

Please explain your answer. This could include, for example, sharing comments on whether you think no restrictions should apply, if you think only a subset of the proposed colours should be allowed or if you think alternative colours should be allowed. Equally, you may want to highlight technical exemptions that should be considered. (Optional, maximum 600 words. Please do not include any personal information in your response.)

-

UKVIA supports proportionate measures to prevent vape devices being designed in ways that disproportionately appeal to children, including a blanket ban on cosmetic lights. However, we disagree that the evidence currently justifies restricting every visible part of every vaping device to a single matt white, black or grey colour.

The Government's consultation recognises that vaping is less harmful than tobacco products and can be an effective way for adult smokers to quit, while making clear that children and adult non-smokers should never vape. Regulation should reflect that distinction. If policy makes vaping products look less

acceptable, less familiar and less attractive to adult smokers, it risks undermining the very harm reduction pathway that has helped many smokers move away from combustible tobacco.

There is also a lack of evidence that limiting devices to matt white, black or grey would materially reduce youth vaping. Youth access is already illegal and should be addressed through enforcement.

The experience of JUUL in the United States demonstrates why device colour should not be treated as a proxy for youth appeal. JUUL's device had a restrained, minimalist appearance, resembling a small USB device rather than a brightly coloured consumer product, yet it nevertheless became widely used among young people. Evidence at the time highlighted its small size, discreet appearance and ease of concealment, as important characteristics. This illustrates that youth uptake is influenced by a wider range of factors than colour alone, including discreetness, social norms and the tendency of young people to emulate behaviours they observe among peers and adults. A regulatory approach focused principally on requiring devices to be black, white or grey therefore risks addressing the appearance of a product without addressing characteristics such as size, concealability and the broader social drivers of youth use.

Device appearance also has legitimate adult functions. Colour, finish and design help adult consumers distinguish between devices, identify brands, recognise product types and select products that suit their preferences. Removing this differentiation would reduce consumer choice, impose redesign and manufacturing costs, and disproportionately affect legitimate manufacturers and independent retailers already facing significant regulatory pressure.

The Regulatory Policy Committee has also noted that DHSC should strengthen causal evidence and reflect uncertainty, while recognising both reducing youth vaping and maintaining vaping as a smoking-cessation aid as policy objectives.

UKVIA therefore recommends a more targeted approach. Government should prohibit demonstrably youth-oriented, novelty, fluorescent, multicoloured or entertainment-style presentation, while undertaking comparative testing before prescribing an exclusive national colour palette. Functional colour should remain permissible where it communicates controls, settings, safety, compatibility, component identification or accessibility.

UKVIA agrees that lights whose sole purpose is cosmetic or decorative may reasonably be prohibited. However, we are not aware of equivalent direct evidence isolating cosmetic lighting as a driver of youth uptake; the case is principally one of preventing circumvention of appearance restrictions. Regulations must therefore define "cosmetic" narrowly. Lights indicating charging, battery condition, power, faults, temperature, resistance, operating mode, liquid status or other safety/status information should remain expressly permitted, including the use of colour where this communicates different states clearly.

Regulation should target features demonstrated to create youth appeal without unnecessarily removing functional design or reducing the attractiveness of lower-risk alternatives to adults who smoke.

The wider package of proposals already includes restrictions on packaging, flavour descriptions, product information and retail display. Taken together, these measures risk making regulated vaping products less visible, less understandable and less appealing to adult smokers, while doing too little to tackle the illegal market.

-

Restricting branding, imagery, and artwork on vapes

We propose that vapes are banned from having images or artwork, except for where these may be a legal requirement, such as warnings.

We also propose that branding should be limited to a single brand name, which would be subject to a set font, size and colour on the device. This aligns with the restrictions we are proposing for heated tobacco devices.

Do you agree or disagree with our proposal to restrict all branding, imagery and artwork on vapes?

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

Please explain your answer. This could include, for example, sharing comments on whether you think none or only some of the proposed restrictions should apply. (Optional, maximum 600 words. Please do not include any personal information in your response.)

-

UKVIA disagrees with the proposal to restrict all branding, imagery and artwork on vapes, as the proposals are disproportionate and would result in blanket plain packaging for a lawful adult consumer product. While the UKVIA supports targeted restrictions on branding or imagery that is clearly designed to appeal to children, such as toy-like designs or youth-orientated graphics. However, banning all ordinary branding goes much further than is necessary and is not in keeping with industry standards for similar markets, such as alcohol, which are allowed to be universally advertised despite age-gating regulations.

Branding serves an important practical function for adult smokers and vapers. For smokers using vaping as an alternative to smoking, brand familiarity can be particularly important. Once a consumer has found a product or brand that supports their transition away from cigarettes, they need to be able to recognise it easily and purchase it with confidence. Removing most visual brand identity risks making that process harder, particularly where products become visually indistinguishable.

Branding also enables consumers to identify manufacturers, distinguish legitimate products and recognise businesses they know and trust. It allows smaller and newer businesses to differentiate themselves and compete with larger manufacturers. Removing almost all visual brand identity would therefore reduce useful information for adult consumers and weaken legitimate competition, without directly addressing underage access or the sale of illicit products.

A more proportionate approach would distinguish between responsible brand identification and branding that is specifically designed or presented in a way that appeals disproportionately to children. UKVIA therefore supports restrictions on demonstrably child-orientated imagery and presentation, while retaining sufficient scope for legitimate and recognisable brand identity on products intended for adult smokers and vapers.

-

Restricting the digital screens on vapes

We propose that digital screens on vapes are prohibited, except for screens which display safety and status information such as battery and liquid levels.

Do you agree or disagree that digital screens on vapes should be restricted to only the display of safety and status information such as battery level, and be greyscale in colour (black, white and grey only)? This would not include lights that indicate status information, such as when the device is being recharged.

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

Please explain your answer. This could include, for example, sharing comments if you think there should be any exemptions to this proposal. (Optional, maximum 600 words. Please do not include any personal information in your response.)

-

UKVIA accepts that digital screens should not be used for animations, games, youth-orientated graphics or other features clearly designed to increase appeal to children. However, a broad restriction limiting screens to greyscale safety and status information is unnecessary and risks removing legitimate functionality for adult users.

Screens serve important consumer and safety functions, including displaying battery level, e-liquid level, wattage or power settings, puff count, lock status, charging status and fault warnings. These features help adult users operate refillable and reusable products safely and correctly. A proportionate red-amber-green system could preserve these functions while avoiding decorative or child-orientated content.

There is an important distinction between promotional content and information that helps consumers understand and manage product use. Adult vapers use a range of device types and nicotine concentrations, including refillable tank and mod devices that allow greater user control. Experimental evidence also shows that vaping behaviour changes in response to product characteristics. Cox et al. (2021), for example, found compensatory changes in puffing behaviour when users vaped liquids of different nicotine concentrations under fixed and adjustable power settings.[1] This demonstrates that users respond to factors such as nicotine strength and device settings rather than using every product identically.

Digital screens can support informed use by making settings and usage information visible. Wattage, puff count and related data can help users understand how they are using a device and monitor changes over time. This may be particularly useful for consumers seeking to moderate use or reduce nicotine intake. UKVIA does not suggest that screens themselves are proven to reduce nicotine consumption, but removing information and feedback may remove tools that can support informed self-management.

This is consistent with wider behavioural-science evidence. Michie et al.'s Behaviour Change Technique Taxonomy identifies "self-monitoring of behaviour" and "feedback on behaviour" as established components of behaviour-change interventions.[2] A device displaying puff count or usage information performs a comparable informational function, allowing users to observe their behaviour and adjust it if they choose. This is fundamentally different from games, animations or decorative graphics.

Screens should therefore be regulated according to the content displayed, rather than treating digital displays as inherently promotional. A numerical puff counter, battery indicator or power setting is functional information regardless of whether it is displayed digitally.

This is particularly important as regulation and environmental policy move the market towards reusable and refillable products. Such products can require greater user interaction and understanding than single-use devices. Regulation should not inadvertently make them harder to operate by removing functionality that helps consumers understand device settings and status.

Functional lights and colour indicators should also remain permitted. Where colour performs a genuine safety or operational function, such as a red-amber-green indicator for battery level, e-liquid level, charging status or warnings, there is no clear justification for requiring greyscale. Colour can communicate status quickly and intuitively without introducing youth-orientated imagery.

UKVIA therefore supports restrictions on decorative, entertainment-based and child-orientated screen content, but not a blanket greyscale restriction. The regulatory objective can be achieved more precisely by permitting functional, monitoring and safety information while prohibiting games, animations, characters and other content principally intended for entertainment or promotion.

[1] Cox S, Goniewicz ML, Kosmider L, McRobbie H, Kimber C, Dawkins L. Nicotine & Tobacco Research. 2021;23(7):1153–1159. doi:10.1093/ntr/ntab013.

[2] Michie S, Richardson M, Johnston M, Abraham C, Francis J, Hardeman W, et al. Annals of Behavioral Medicine. 2013;46(1):81–95. doi:10.1007/s12160-013-9486-6.

-

Stopping vapes imitating other products

Currently vapes can and do copy the design of other products, such as highlighter pens, refillable water bottles and game devices.

We propose to limit the potential appeal of vapes by stopping them from looking like other products.

Do you agree or disagree that vapes should not be permitted to mimic the design of other products and items? The objective of this proposal is to limit the appeal or attractiveness of vapes.

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

Please explain your answer. This could include, for example, sharing comments if you think there should be any exemptions to this proposal. (Optional, maximum 600 words. Please do not include any personal information in your response.)

-

UKVIA agrees that vaping products should not be deliberately designed to imitate other consumer products or objects where doing so could disguise their nature or increase their novelty or appeal to children and young people.

We therefore support restrictions on products intentionally designed to resemble items such as toys, games, cosmetics, confectionery, drinks, stationery or other everyday objects in a way that could cause the device to be mistaken for something other than a vaping product.

However, the guidance must define “mimic” clearly and objectively. The restriction should apply where the overall design deliberately reproduces the recognisable appearance or identity of another product category. It should not capture ordinary similarities arising from functional or ergonomic design. Many legitimate vaping devices are necessarily compact, cylindrical or rectangular, use buttons, screens, charging ports or other features common to portable electronic products. Those generic characteristics should not, by themselves, amount to prohibited imitation.

Many adult vapers also choose small, discreet devices because they are practical and convenient, which regulations should preserve, as changes that make products less usable could discourage smokers from switching to vaping. A broad or subjective test based simply on whether a vape “resembles” another object could create uncertainty for manufacturers, retailers and enforcement authorities and lead to inconsistent interpretation. Government should therefore publish clear criteria and illustrative examples showing both prohibited and permitted designs.

Any assessment should consider the product as a whole, including its shape, decorative features, imagery, branding and presentation, rather than relying on one common design feature in isolation.

UKVIA would therefore support a proportionate rule that prohibits deliberate novelty and disguised vaping products while preserving legitimate adult-oriented device design, functional features, accessibility and innovation.

This approach would directly address products designed to conceal their nature or create inappropriate novelty appeal without unintentionally restricting conventional vaping devices that are readily identifiable as such.

-

Time allowed to implement new device requirements

If and when new requirements are introduced, manufacturers will need time to ensure their devices are compliant. Retailers may also need time to sell old stock that does not comply with new law.

There should be a long enough notice period before new requirements come into force. This period would start from when the details of the new requirements are made clear. We have not yet decided what is the best way to share those details, but it could be, for example, in a government response to this consultation or when regulations are presented to the relevant national Parliament.

We propose that a minimum notice period of 12 months would be enough. This would mean all vapes would need to comply with any new regulatory requirements by the end of a 12 month implementation period. However, a longer or shorter notice period may be needed, and we welcome views on this.

Do you agree or disagree with our proposed implementation period of no less than 12 months (from when the detail of any new requirements is clear)?

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

Please explain your answer. This could include, for example, sharing comments on whether the proposed implementation period should be shorter or longer, or on implications that the proposed implementation period could have for manufacturers, retailers or other groups. Please reference any evidence that you have considered to support your response. (Optional, maximum 600 words. Please do not include any personal information in your response.)

The UKVIA agrees that there should be a minimum implementation period of 12 months from the point at which final requirements are clear. However, 12 months should be viewed as a regulatory minimum, not a one-size-fits-all solution, and different changes should be given alternative implementation periods that match the scale of change, as the implementation period should begin only once manufacturers have complete and legally certain technical specifications.

Businesses also need clarity on matters such as packaging requirements, flavour descriptors, product information and warning formats before compliance, production and stock management decisions can be made. Any transition must additionally allow sufficient time for retailers to sell through existing lawful stock and avoid unnecessary product wastage. This should therefore be reviewed to determine how long needs to be allocated to each change.

Given the scale of the proposed changes, Government should retain flexibility to provide longer implementation periods where substantial redesign, supply chain adjustments or coordinated regulatory changes are required. The minimum 12 months proposed must not become the default, as a one-size-fits-all solution.

-

Retail display

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

Under existing legislation, tobacco products cannot be displayed inside or outside most shops across the UK. However, tobacco products can be shown to a customer following a request. The request must be by a person who is of the legal age of sale in England, Wales and Northern Ireland. We call this a ‘requested temporary display’ in this consultation.

Requested temporary displays enable informed purchasing decisions. As a result of a requested temporary display, other people nearby may also incidentally see these products. Current legislation in England, Wales and Northern Ireland also makes allowances for:

- restocking
- staff training
- pricing
- display unit maintenance

We call this ‘incidental display’ in this consultation.

Restricting the retail display of cigarette papers, heated and other tobacco-related devices and herbal smoking products in England, Wales and Northern Ireland

Definition of vaping products

Throughout this section, we refer to ‘vaping products’. This includes vapes, as well as other vape components and refill containers sold separately from the device.

Restricting the display of vaping and nicotine products across the UK

We propose that the display of vaping products and nicotine products is restricted.

We propose that the same allowances for temporary and incidental displays as we have proposed for most other products within scope of this consultation are applied across the UK. This includes a temporary requested display taking place behind a sales counter. This would make the maximum visible area permitted for a requested temporary display or incidental display:

- 1.5 square metres in England, Wales and Northern Ireland
- 0.1 square metres in Scotland

We also propose that a requested temporary or incidental display of vaping or nicotine products must not result in the display of:

- tobacco products (and smoking-related products in Scotland)
- cigarette papers
- heated and other tobacco-related devices
- herbal smoking products

Do you agree or disagree with our proposal to restrict the display of vaping products? This would include the requirement that their requested temporary display must take place from behind a sales counter.

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

Do you agree or disagree with our proposal to restrict the display of nicotine products? This would include the requirement that their requested temporary display must take place from behind a sales counter.

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

Do you agree or disagree that the requested temporary or incidental display of vaping and nicotine products should not result in the display of tobacco products (and smoking-related products in Scotland), cigarette papers, heated and other tobacco devices or herbal smoking products?

- Agree
- Neither agree nor disagree

- Disagree
- Don't know

Please explain your answers. This could include, for example, sharing comments on why you think our proposed restrictions should or should not apply to certain types of products. (Optional, maximum 600 words. Please do not include any personal information in your response.)

-

UKVIA disagrees with proposals to restrict the display of vaping and nicotine products.

Vaping products are lawful adult consumer products and play an important role in helping smokers move away from combustible tobacco. The Government's consultation recognises that vaping is less harmful than smoking and can be an effective way for adult smokers to quit, while making clear that children and adult non-smokers should never vape. Regulation should reflect that distinction.

Restricting displays to behind the counter would reduce adult smokers' ability to see, compare and understand the products available to them. This is particularly important for smokers who may be unfamiliar with vaping and need clear information on devices, flavours, nicotine strengths and formats before making a switch. This access to information is further limited in non-specialty shops like petrol stations or supermarkets, where the retailer often does not have knowledge of the product. Any changes to the displays in these environments could potentially deprive the consumer of important information needed to make an informed purchase. The proposed changes are intended to target illegitimate retailers who purposely obscure displays, but must be careful not to include responsible businesses who already follow regulations by the letter.

Consumers already face enough pressure when picking a device at a shop counter, and legislation that further complicates this increases the risk of consumers defaulting to smoking under pressure. It also makes it seem like vaping and smoking are equally harmful, as they are regulated the same, which may result in misinformation.

While the UKVIA supports strong enforcement against underage sales and irresponsible retailing, hiding regulated products from adult consumers is not the right way to address youth access. It risks making vaping less visible as an alternative to smoking, while doing little to tackle illicit sales or retailers who already ignore age-of-sale laws.

The UKVIA agrees that any temporary or incidental display of vaping and nicotine products should not result in the display of tobacco products or smoking-related products. Vaping should not be visually or commercially conflated with combustible tobacco.

Finally, UKVIA believes the regulatory approach should distinguish between specialist vape retailers. Specialist vape shops are fundamentally different retail environments where customers enter specifically to obtain vaping products, receive advice and compare products, often as part of switching away from smoking. Where appropriate age-verification measures are in place, requiring products to be concealed from view would significantly restrict the ability of adult consumers to understand and compare the available options. UKVIA therefore believes specialist vape retailers should benefit from an exemption comparable in principle to that afforded to specialist tobacconists, subject to appropriate safeguards such as displays not being visible from outside the premises.

A more proportionate approach would allow responsible display of vaping and nicotine products in adult-facing retail environments (e.g. specialist vaping stores), with clear age restriction requirements, while maintaining stronger focuses on tobacco products and illegal sales. This would mirror policy for specialist tobacco retailers that sell cigars or cigarillos, who age gate at the door just like specialist vape retailers. Differences between the two stores would be inconsistent and difficult to justify.

-

Display of prices of vaping and nicotine products across the UK

Across the UK, we propose to apply the same principles for the display of prices of tobacco products to:

- vaping products
- nicotine products

We propose that the price lists for vaping and nicotine products are permitted to also include nicotine strength and ingredients. This will help consumers make informed purchases.

We propose that separate price lists must be used for vaping and nicotine products and for tobacco products, for both permanently displayed price lists and picture prices lists, given vaping and nicotine products carry lower levels of harm than tobacco products.

Do you agree or disagree with our proposal to restrict the display of prices for vaping products, and allow for additional information on nicotine strength and ingredients?

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

Do you agree or disagree with our proposal to restrict the display of prices for nicotine products and allow for additional information on nicotine strength and ingredients?

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

Please explain your answers. This could include, for example, sharing comments on why you think our proposed restrictions should or should not apply to certain types of products. (Optional, maximum 600 words. Please do not include any personal information in your response.)

-

The UKVIA disagrees with proposals to restrict the display of prices for vaping and nicotine products in the same way as tobacco products.

Vaping and nicotine products are not tobacco products and should not be regulated as though they carry the same level of harm. Adult smokers need clear, accessible information on price, nicotine strength, ingredients and product type in order to compare products and make informed decisions. Restricting price displays risks making the legal market harder to navigate, particularly for smokers considering switching from cigarettes. Further ambiguity is not needed in this regard.

Instead, the UKVIA supports the proposal that vaping and nicotine product price lists should be separate from tobacco product price lists. This is important to avoid conflating lower-risk alternatives with combustible tobacco and to support clearer consumer understanding.

Price is also an important consideration for adult smokers deciding whether to switch to vaping. ASH's 2026 Smokefree GB survey found that 13% of current vapers who also smoke cite saving money compared with smoking as their main reason for vaping, demonstrating that the financial advantage of vaping can form part of the incentive to move away from combustible tobacco. Restrictions should therefore not make it unnecessarily difficult for adult smokers to understand the comparative cost of lawful vaping products. UKVIA believes retailers should be able to display clear prices and communicate legitimate price promotions or savings, subject to appropriate controls to prevent youth-targeted marketing. The consultation itself recognises that price information helps consumers make informed purchases and proposes separate price lists for vaping and tobacco products to reflect their different risk profiles. Rather than limiting useful price information for adult consumers, Government should work with Trading Standards and responsible retailers to use enforcement and intelligence to identify businesses engaged in illegal sales, including underage or illicit product sales.

However, the display of prices for vaping and nicotine products should not be subject to unnecessary restrictions. Allowing factual list pricing is a proportionate way of ensuring that adult consumers can compare regulated nicotine products. Price transparency supports informed choice and competition, while age-gated access provides the appropriate safeguard against youth access.

-

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

Across the UK, it is permitted to display tobacco products inside premises that are only accessible to people working in the tobacco trade as long as this is not visible to the public from the outside. We propose to have this exemption to allow for relevant trade premises to display vaping products and nicotine products.

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

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

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

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

Please explain your answers. If you have comments on business exemptions to our display proposals, please include them here. This could include, for example, why you think certain exemptions should or should not be considered as well as any additional exemptions you think are necessary. (Optional, maximum 600 words. Please do not include any personal information in your response.)

-

UKVIA agrees with the proposal to allow the display of vaping and nicotine products in relevant trade premises.

Where premises are accessible only to those working within the trade and products are not visible to the public, there is no policy justification for restricting displays. Trade premises play an important role in product education, staff training, business-to-business engagement and regulatory compliance.

However, UKVIA believes this exemption should also extend to genuine specialist nicotine retailers whose businesses exclusively or predominantly sell vaping products. These businesses are fundamentally different from convenience stores, supermarkets, petrol stations and other mixed-use premises where vaping products are only one of many categories.

Applying a blanket display restriction to a specialist retailer would, in practice, require almost its entire principal product range to be concealed. This is very different from requiring a general retailer to cover a comparatively small section behind the counter. Government impact assessment work has estimated around 58,905 UK retailers selling vapes, of which approximately 3,573 were specialist vape shops. An exemption could therefore be tightly targeted at a small and identifiable part of the market.

A genuine specialist retailer should not be confused with a general retailer that happens to sell significant quantities of vaping products. A convenience store or petrol station does not become a specialist vape retailer simply because it sells large numbers of vapes, any more than it becomes a specialist tobacconist because it sells cigarettes.

Specialist retailers also perform a distinct role for adult smokers and vapers. Staff are more likely to have detailed product knowledge and can advise consumers on devices, nicotine strengths and appropriate products. This role is recognised elsewhere in the smoking-cessation system: NCSCT guidance considers how stop smoking services can work with specialist vape shops, while NHS Better Health advises smokers that specialist vape shops can provide advice on choosing appropriate devices and nicotine strengths.

UKVIA therefore recommends establishing a clear statutory definition of a “specialist nicotine retailer”, with any exemption limited to retailers meeting a deliberately high threshold:

A “specialist nicotine retailer” means a shop or other retail premises to which adult consumers have access where at least 90% of retail sales made directly to consumers at those premises, by value, derive from the sale of regulated vaping products, other non-tobacco nicotine products and accessories designed or adapted for use with such products.

Sales should be calculated over the most recent 12 months for which records are available or, where the business has traded for less than 12 months, the period since trading began.

The 90% threshold would ensure the exemption is narrowly drawn and could not be used by convenience stores or other mixed retailers simply because they sell significant quantities of vaping products. Retailers claiming the exemption could also be required to retain appropriate sales records demonstrating compliance.

Qualifying specialist nicotine retailers should be permitted to display vaping and nicotine products within their premises, subject to safeguards including that displays are not visible from outside. This would also provide greater consistency with the treatment of specialist tobacconists, which are already recognised as a distinct category of retailer.

More broadly, UKVIA remains concerned about restricting the visibility of vaping products. Given the Government’s recognition that vaping is less harmful than smoking and can help adult smokers quit, regulation should preserve opportunities for smokers to learn about and access lower-risk alternatives while maintaining strong protections against youth access.

A targeted exemption would not weaken the Government's objectives. It would allow restrictions to apply in general retail environments while recognising that specialist retailers operate differently. If Government is not prepared to create such an exemption through the display regulations, equivalent recognition of qualifying specialist nicotine retailers should be considered within the forthcoming retail licensing framework.

UKVIA therefore supports the exemption for relevant trade premises and recommends a specific exemption for qualifying specialist nicotine retailers.

-

Exemptions to display restrictions for vaping and nicotine products in pharmacies in England, Wales and Scotland

We welcome views on exemptions that allow a limited display of vaping and nicotine products inside community pharmacies in England, Wales and Scotland. For example, this could include locked transparent display units. This could help people to try to quit smoking, while restricting accessibility to young people.

However, we do not propose that the same exemption applies to vape shops, since they are not clinical settings.

Do you agree or disagree that community pharmacies in England, Wales and Scotland should be permitted an exemption to allow for the limited display of vaping and nicotine products?

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

Please explain your answer. This could include, for example, why you think certain exemptions should or should not be considered as well as any additional exemptions you think are necessary. (Optional, maximum 600 words. Please do not include any personal information in your response.)

-

The UKVIA strongly disagrees with the calls for a pharmacy-specific exemption because vaping and nicotine products should not be subject to the proposed display restrictions in the first place.

UKVIA recommends that the Government introduce a targeted exemption from display restrictions for genuine specialist nicotine retailers.

There is an important inconsistency in the proposed approach. Specialist tobacconists are recognised as a distinct category of retailer and are permitted to display tobacco products and prices inside their premises, provided those displays are not visible from outside. The consultation proposes to maintain that exemption, while expressly declining to provide an equivalent exemption for specialist vape shops. This is difficult to justify when the Government itself recognises that smoking is more harmful than vaping.

Part of the issue is the need to distinguish clearly between a specialist nicotine retailer and a general retailer that happens to sell significant quantities of vaping products. A convenience store or petrol station does not become a specialist vape retailer simply because it sells a large number of vapes, any more than it becomes a specialist tobacconist because it sells cigarettes.

A genuine specialist nicotine retailer is fundamentally different. Its business is overwhelmingly focused on vaping and other non-tobacco nicotine products; its staff are expected to have detailed product knowledge; and its customers enter specifically to purchase these products, compare alternatives and seek advice. Such businesses already operate robust age-verification procedures and provide an adult-focused retail environment. For smokers seeking to move away from cigarettes, the ability to view products and discuss the available devices, flavours, and strengths is an important part of the specialist service.

UKVIA therefore recommends establishing a clear statutory definition, with any exemption available only to businesses meeting a high threshold. We propose:

A "specialist nicotine retailer" means a shop or other retail premises to which adult consumers have access where at least 90% of retail sales made directly to consumers at those premises, by value, derive from the sale of regulated vaping products, other non-tobacco nicotine products, and accessories designed or adapted for use with such products.

For these purposes, sales should be measured by sale price over:

- *the most recent 12-month period for which sales records are available; or*
- *where the premises have traded for less than 12 months, the period since trading began.*

The proposed 90% threshold would create a deliberately narrow exemption. Indeed, it would be more stringent than the existing statutory definition of a specialist tobacconist, for which more than half of relevant sales must derive from specified tobacco products and smoking accessories.

Furthermore, this threshold is intended to prevent the exemption being exploited by mixed-use retailers, such as American candy stores, mobile phone shops or other businesses that may sell significant volumes of vaping products but are not genuinely specialist nicotine retailers.

Qualifying specialist nicotine retailers should be permitted to display vaping and nicotine products within their premises, subject to appropriate safeguards, including a requirement that displays are not visible from outside. The Government could also require retailers claiming the exemption to retain evidence demonstrating that they meet the sales threshold.

This would not undermine the Government's objective of reducing youth exposure. It would provide a precise and enforceable distinction between specialist adult retail environments and general retailers, while preventing convenience stores, petrol stations and other mixed retailers from qualifying merely because they sell significant volumes of vaping products.

A regulatory framework capable of distinguishing specialist tobacconists from general tobacco retailers should be capable of making an equivalent distinction for specialist retailers predominantly selling lower-risk nicotine products.

-

Time allowed to implement all new display restrictions

If and when new requirements are introduced, retailers will need time to update their shops to comply with the necessary changes.

There should be a long enough notice period before new requirements come into force. This period would start from when the details of the new requirements are made clear. We have not yet decided what is the best way to share those details, but it could be, for example, in a government response to this consultation or when regulations are presented to the relevant national Parliament.

We propose that a minimum notice period of 6 months would be enough. This would mean the display of products in scope would need to comply with any new requirements by the end of a 6-month implementation period. However, a longer or shorter notice period may be needed, and we welcome views on this.

Do you agree with our proposal that there should be a minimum of 6 months' notice (from when the detail if any new requirements is clear)?

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

Please explain your answer. This could include, for example, sharing comments on whether the proposed implementation period should be shorter or longer, or on implications that the proposed implementation period could have for manufacturers, retailers or other groups. Please reference any evidence that you have taken into account to support your response. (Optional, maximum 600 words. Please do not include any personal information in your response.)

-

The UKVIA does not support the proposed display restrictions. However, if the Government proceeds with these measures, retailers and manufacturers will require significantly more time to adapt than the six months proposed.

The display proposals form part of a wider package of changes affecting packaging, branding, product appearance and retail presentation. Businesses will need time to understand the final requirements, redesign stores and displays where necessary, update compliance procedures, train staff and manage existing stock in an orderly and cost-effective manner.

A six-month implementation period would create unnecessary disruption and cost across the supply chain, particularly for small and medium-sized businesses. It also risks causing confusion for retailers and consumers if multiple regulatory changes are introduced simultaneously.

As with the proposed packaging restrictions, UKVIA believes that a minimum implementation period of 24 months would be more appropriate. The implementation period should only begin once final regulations, technical requirements and enforcement guidance have been published in full.