

## Tobacco and Nicotine Products

The Bill includes proposals to ban the use of nicotine inhaling devices, such as e-cigarettes, in enclosed spaces like restaurants, pubs and at work. Shops will also have to join a register for retailers of tobacco and nicotine products, and it will become an offence to “hand over” tobacco and e-cigarettes to anyone under the age of 18.

### *Question 1*

Do you agree that the use of e-cigarettes should be banned in enclosed public and work places in Wales, as is currently the case for smoking tobacco?

Yes, we do. As the Bill states this should include all nicotine inhaling devices. It will be easier for organisations to manage a total ban on smoking tobacco and use of nicotine inhaling devices including e cigarettes. The actual vapour being exhaled by those “vaping” can be very annoying to others and it is also a poor example to children, who may follow the example and either vapour or smoke. There will also be some residual nicotine in the vapour which may have harmful effects on others. It has been known for many years that nicotine is addictive and it also has adverse medical effects so should not be encouraged in any manner.

### *Question 2*

Do you believe the provisions in the Bill will achieve a balance between the potential benefits to smokers wishing to quit with any potential dis-benefits related to the use of e-cigarettes?

Yes. Those wishing to quit smoking need to gradually reduce their use of the e-cigarettes over time and restrictions on use will help enhance this behaviour. We are not aware of any dis-benefits.

### *Question 3*

Do you have any views on whether the use of e-cigarettes re-normalises smoking behaviours in smoke-free areas, and whether, given their appearance in replicating cigarettes, inadvertently promote smoking?

|Yes, we feel that the use of e-cigarettes normalises the behaviour in smoke free zones and potentially encourages others to take up the habit. Some patients only used e-cigarettes in public areas, where they are accepted due to social pressures to conform. They were actually upset to learn that e-cigarettes contained nicotine as they thought they are was only steam or water. Some of the also shared the -cigarettes and were unaware of potential risk of spreading infections such as viral hepatitis. The same is also true of hocker or bubble pipes which should be made to include these into the Bill.

#### *Question 4*

Do you have any views on whether e-cigarettes are particularly appealing to young people and could lead to a greater uptake of their use among this age group, and which may ultimately lead to smoking tobacco products?

Yes we do have concerns about risks to young people as there is an increasing social trend to their use in these age groups partly due to social pressures.

#### *Question 5*

Do you agree with the proposal to establish a national register of retailers of tobacco and nicotine products?

Yes

This may need to be modified to include pharmacies if the law is changed to allow short term use of e cigarettes to be used for smoking cessation therapy.

#### *Question 6*

What are your views on creating a new offence for knowingly handing over tobacco and nicotine products to a person under 18, which is the legal age of sale in Wales?

We support this.

This may need to be modified if the law is changed to enable the use of e-cigarettes to be used short term for smoking cessation on prescription as some of the patients may be under 18 years of age.

## Special Procedures

The Bill includes a proposal to create a compulsory licensing system for people who carry out special procedures in Wales. These special procedures are tattooing, body piercing, acupuncture and electrolysis. The places where these special procedures are carried out will also need to be approved.

### *Question 7*

What are your views on creating a compulsory, national licensing system for practitioners of specified special procedures in Wales, and that the premises or vehicle from which the practitioners operate must be approved?

We support this. People are very often unaware of the risks related to these procedures due to infection, allergy or potential carcinogens in some inks used for tattoos. They are also unaware of the potential for life long scarring resulting occasionally in disfiguring or disabling deformity from procedures which have complications. They are also unaware that it is difficult to remove evidence of piercing or tattooing, when they no longer want the associated affect.

### *Question 8*

Do you agree with the types of special procedures defined in the Bill?

Yes

### *Question 9*

What are your views on the provision which gives Welsh Ministers the power to amend the list of special procedures through secondary legislation?

We support this

*Question 10*

Do you have any views on whether enforcing the licensing system would result in any particular difficulties for local authorities?

No

## Intimate piercings

The Bill includes a proposal to ban intimate body piercings for anyone under the age of 16 in Wales.

### *Question 11*

Do you believe an age restriction is required for intimate body piercing? What are your views on prohibiting the intimate piercing of anyone under the age of 16 in Wales?

Yes

### *Question 12*

Do you agree with the list of intimate body parts defined in the Bill? Whether any other types of piercings (for example naval piercing, tongue piercing) should be prohibited on young people under the age of 16.

We believe naval, lip, nose and tongue piecing should be added to the list. These have high risk of infection and complication and the implications of these need to be understood fully by the person having the procedure, hence the support to restrict this to over 16 year olds.

## Community pharmacies

The Bill will require local health boards in Wales to review the need for pharmaceutical services in its area, and that any decisions relating to community pharmacies are based on the needs of local communities.

### *Question 13*

Do you believe the proposals in the Bill will achieve the aim of improving the planning and delivery of pharmaceutical services in Wales?

Yes

### *Question 14*

What are your views on whether the proposals will encourage existing pharmacies to adapt and expand their services in response to local needs?

We believe that if need is shown in an area potentially pharmacies will respond but there may be restrictions due to suitable premises or staff availability.

## Public toilets

The Bill includes a proposal that will require local authorities to prepare a local strategy to plan how they will meet the needs of their communities for accessing public toilet facilities. However, the Bill does not require local authorities to actually provide toilet facilities.

### *Question 15*

What are your views on the proposal that each local authority in Wales will be under a duty to prepare and publish a local toilets strategy for its area?

We support this. Some people restrict their activity due to lack of available accessible public toilets in the area. The published data should include data on the current toilets including opening times and accessibility especially for disabled toilets.

### *Question 16*

Do you believe that preparing a local toilet strategy will ultimately lead to improved provision of public toilets?

We hope that this will be the case but the strategy will need to be open to public comment

### *Question 17*

Do you believe the provision in the Bill to ensure appropriate engagement with communities is sufficient to guarantee the views of local people are taken into account in the development of local toilet strategies?

Yes

*Question 18*

What are your views on considering toilet facilities within settings in receipt of public funding when developing local strategies?

These should be included but some may need to have restrictions to those using the settings for their prime purpose.

## Other comments

### *Question 19*

Do you believe that the issues included in this Bill reflect the priorities for improving public health in Wales?

Yes

### *Question 20*

Are there any other areas of public health which you believe require legislation to help improve the health of people in Wales?

Minimum alcohol pricing which is already being considered

### *Question 21*

Are there any other comments you would like to make on any aspect of the Bill?

No