

Khader Safi  
1360 University Ave W  
Saint Paul, MN 55104

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Dear Russ Stark,

I am writing as a business owner and taxpaying constituent to express extreme opposition to Ordinance 15-57, which would prohibit the sale of vapor products (otherwise known as e-cigarettes) and smokeless tobacco in flavors other than tobacco, menthol, mint and wintergreen in retail locations that are not specialty tobacco or vapor shops.

I moved from California and started my e-juice company 2 years ago in St Paul. Since then, we have created 7 full time jobs, and generated and reinvested over \$1.5 Million in the local economy. Most of our vendors are local. All of our service providers are local, and most importantly, our employees are local.

Flavoring is an integral part of our product, since the ingredients have no natural flavor. E-juice consists of Vegetable Glycerin, Propylene Glycol, Nicotine and Food Flavoring.

Adopting this ordinance will limit smokers exposure to new and less harmful forms of nicotine delivery. When we started, 90% of our sales were e-juice of high nicotine concentration (18mg/ml). Now, over 80% of our sales are for low nicotine concentration (0-6mg/ml). We believe that our product is a less harmful alternative to smoking, and new data keeps shedding positive light on the product and the help it might be able to offer.

If adopted, this ordinance will adversely affect my business and my ability to continue to operate in St Paul.

In most cases, a smoker's first exposure to smoke-free alternatives like e-cigarettes and snus is in a non-specialty convenience store or gas station that also sells cigarettes. Although wild speculation by anti-smoking activists would have you believe that the range of flavors serves the sole purpose of enticing children, the reality is that flavors play a crucial role in helping adults transition away from smoking.

Vapor products come in a wide variety of flavors because adult consumers not only find them enjoyable, but also extremely helpful in quitting or greatly reducing their smoking. Two large-scale surveys of adult consumers of vapor products support this claim <http://www.mdpi.com/1660-4601/10/12/7272> and <http://vaping.com/data/big-survey-2014-initial-findings-eliqid>. Both surveys found that flavor variety is extremely important in helping smokers distance themselves from the taste of a burning cigarette. Indeed, the first survey above included 4,500 adults, of whom 90% were ex-smokers. Between 60 and 70% of the respondents reported regularly using fruit and sweet flavors. Among the respondents who had quit smoking, flavor variability was rated as a 4 out of 5 ("very important") when asked about the impact of flavors on their ability to stay smoke-free.

Reducing awareness of and access to flavor options creates a barrier to Saint Paul's adult smokers becoming smoke free. As a result, Saint Paul smokers will actually be discouraged from quitting by switching to a product that is estimated to be 99% less hazardous than smoking.

Council members should consider the fact that although some youth are experimenting with e-cigarettes, youth smoking rates continue to decline at record pace. Given that Minnesota state law already prohibits sales to anyone under 18 years old, strict enforcement of the law should be the focus rather than making vapor products less attractive, accessible, and effective for adults.

I along with my fellow members of Consumer Advocates for Smoke-free Alternatives Association (CASAA) thank you for considering my comments on this issue and implore you to reject Ordinance 15-57 as well as any future legislation that would impede adult access to reduced harm nicotine products. Please keep me informed as to the progress of this ordinance through the legislative process. I look forward to your response on this issue and I am available for any questions you might have.

Sincerely,  
Khader Safi