



THE CDOH IN THE NEW  
NICOTINE LANDSCAPE:

# HOW THE TOBACCO INDUSTRY IS REINVENTING ADDICTION



## EXECUTIVE SUMMARY

The tobacco industry is not declining but transforming, shifting rapidly into New Emerging Nicotine and Tobacco Products (NENTPs); vapes, e-cigarettes, and nicotine pouches, to protect profits and recruit new users. This shift is deliberate, driven by corporate strategy across 6 pillars: market expansion, political lobbying, youth-targeted marketing, oversupplied retail and supply chains, manufactured scientific doubt, and narrative framing that positions the industry as a public health partner rather than a source of harm.

The human cost is significant. Youth vaping now exceeds adult smoking rates in many countries, dual use is rising, and emerging evidence links vaping to respiratory harm, cardiovascular effects, and new nicotine dependence in previously non-smoking populations<sup>(34)</sup>. NENTPs cannot be treated as a simple product-safety issue; health promotion foundations must reframe the challenge as a Commercial Determinants of Health (CDoH) issue, addressing the systems and incentives behind it, not just the products.

Case studies across the Asia-Pacific show this in practice. Australia's consolidation of 8 fragmented tobacco laws into one framework, paired with a pharmacy-only vaping model, cut teen vaping initiation in New South Wales from 29.6% in April 2024 to 20.1% in October 2025. Taiwan's digital enforcement model achieved a 99.8% online content removal rate, though overseas-hosted evasion persists. Singapore's response to etomidate-laced vapes shows that even a total ban needs built-in flexibility for unanticipated threats. Thailand's Parliament, backed by evidence and advocacy exposing industry-funded research, held the line on prohibition. In Australia, coordinated advocacy forced government accountability ahead of formal inquiry findings. Peer-led campaigns like Victoria's UNCLOUD are showing early signs of shifting youth social norms around vaping.

Together, these cases point to one conclusion: no single lever; legislation, enforcement, advocacy, or communication, is sufficient alone. Sustainable progress requires all four working together, grounded in a clear understanding of the commercial strategies driving the crisis.



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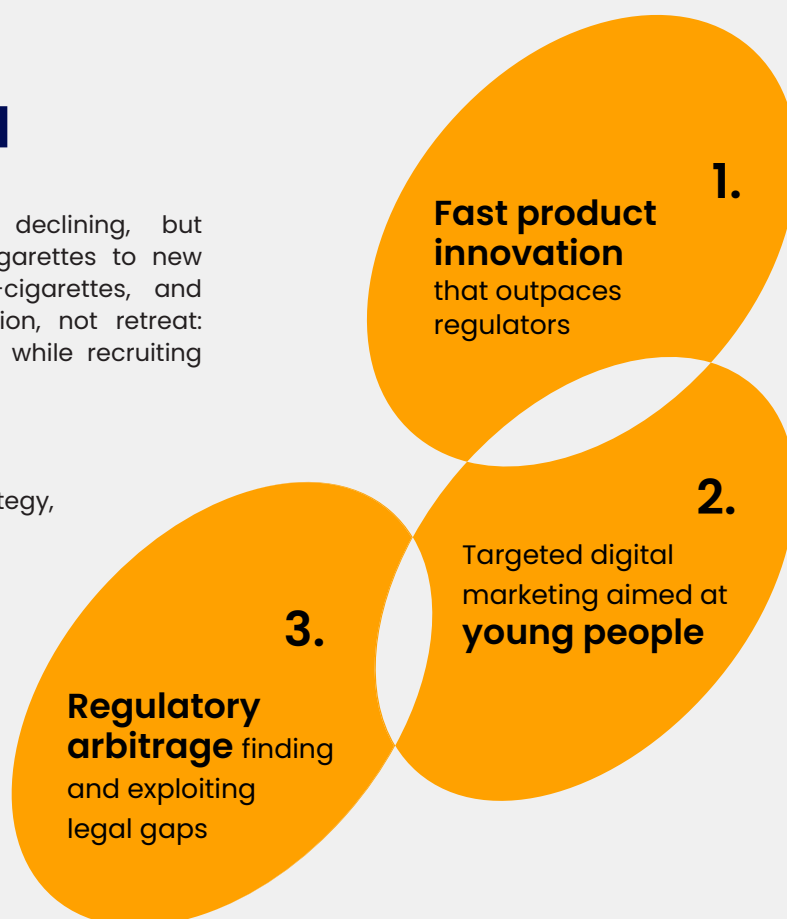
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# INTRODUCTION

The tobacco industry is not declining, but transforming, shifting fast from cigarettes to new nicotine products like vapes, e-cigarettes, and nicotine pouches. This is reinvention, not retreat: the industry protects future profits while recruiting a new generation of users.

This shift is deliberate corporate strategy, built on **3 tactics:**

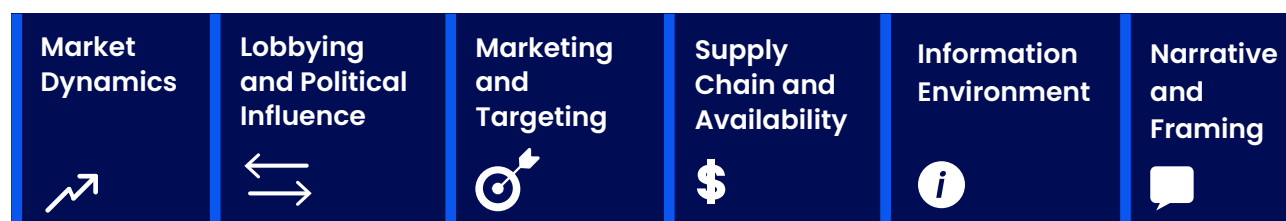


The human cost is real and growing. Tobacco use remains a leading preventable cause of death worldwide. Increasingly, people are using cigarettes and vapes together (known as dual use), especially among youth. New evidence links vaping to lung damage, heart problems, and new nicotine addiction in people who never smoked. Youth vaping rates have overtaken adult smoking rates in many countries, and this trend is serious enough to drive dedicated reforms to protect young people.

Given this, treating New Emerging Nicotine and Tobacco Products (NENTPs) as a simple product-safety issue is not enough. Health promotion foundations need to see this as a Commercial Determinants of Health (CDoH) problem meaning the systems, practices, and pathways companies use to shape health outcomes. Only this reframing enables the structural policy changes needed to counter an industry reinventing addiction for a new era.

## Commercial Determinants at Work

CDoH are the systems, practices, and pathways through which commercial actors influence health and health equity. In the tobacco and nicotine sector, these determinants function through 6 primary pillars of influence designed to maximize profit at the expense of public health<sup>(33, 13)</sup>.





## 1. Market Dynamics

The tobacco industry uses its structural market power to concentrate capital, control supply, and secure its long-term financial survival.

The global e-cigarette market is projected to exceed

USD **60 billion** by 2030



**Future-proofing revenue:** Major multinational corporations are rapidly widening their product offerings to also include NENTPs such as vapes and nicotine pouches along with combustible tobacco, aiming to recruit what the industry calls a replacement generation of users<sup>(1, 28)</sup>.

**Aggressive market expansion:** The global e-cigarette market is projected to exceed USD 60 billion by 2030, driven by middle-income countries and by adolescents<sup>(33, 28)</sup>.

**Targeting new segments:** While big tobacco companies build or acquire their own NENTP brands, independent brands are used strategically to fill market gaps. These brands specifically target youth and price-sensitive consumers to reach populations the wider industry might otherwise struggle to access directly<sup>(32)</sup>.

**Rapid innovation:** The industry relies on fast product cycles; disposable vapes, nicotine pouches, and heated tobacco products (HTPs), to consistently outpace government regulatory response times, and often move to the next product category before regulation catches up<sup>(27)</sup>.



## 2. Lobbying and Political Influence

Commercial actors work to hijack political and legislative processes to delay, weaken, or block health regulations.

**The harm reduction smokescreen:** The industry positions vaping as a harm reduction tool to gain access to health policy spaces. By framing NENTPs as cessation aids rather than new sources of addiction, companies argue for lighter regulation and a seat at the policy table<sup>(29, 31)</sup>.

**Third-party allies and front groups:** To build legitimacy, the industry funds researchers, cessation advocates, and patient groups who appear independent but promote industry-friendly positions. In Australia, the Australian Tobacco Harm Reduction Association (ATHRA) which describes itself as a registered health promotion charity has made submissions to multiple state and federal inquiries since 2018, including consultations on the National Tobacco Strategy, promoting vaping as a harm reduction strategy. ATHRA is funded through Knowledge-Action-Change (K-A-C), backed by the Foundation for a Smoke-Free World (FSFW), an organization wholly funded by a major tobacco company. A similar pattern appears in Thailand, where End Cigarette Smoke Thailand (ECST), tied to major tobacco companies, has actively lobbied the Thai Parliament and senior officials to legalize e-cigarettes<sup>(31, 20)</sup>.

**Active lobbying against regulation:** The industry lobbies directly against flavor bans, marketing restrictions, tax increases, point-of-sale restrictions, and nicotine caps, often through industry-funded front groups designed to obscure the source of this pressure.

**Regulatory avoidance:** Companies exploit legal loopholes to classify vapes as consumer electronics rather than tobacco products, allowing them to sidestep the stricter frameworks that typically apply to tobacco<sup>(28)</sup>.

**Covert influence:** Despite international obligations under WHO FCTC Article 5.3, which calls for transparency in tobacco policymaking, covert access remains a serious problem. Australian national media reported that in May 2026,

a move health advocates criticized as a corrupt attempt to influence policy without public scrutiny



the tobacco industry was allowed to give a secret briefing to a Federal Senate Inquiry into Illegal Tobacco in Australia, a move health advocates criticized as a corrupt attempt to influence policy without public scrutiny<sup>(2)</sup>.

**Litigation and regulatory chill:** The industry uses the threat of costly litigation to create regulatory chill, discouraging governments from introducing measures such as pictorial health warnings or plain packaging, since officials may fear prolonged legal battles even when the regulation is sound<sup>(25)</sup>.



### 3. Marketing and Targeting

Marketing shapes social norms and individual identities, and the industry uses this power to normalize the consumption of harmful products among young people.

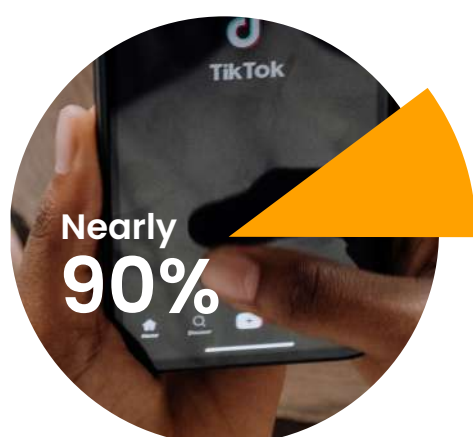
**The digital siege:** The industry relies heavily on social media platforms such as Instagram, TikTok, and Snapchat, along with influencers and celebrity endorsements, to reach adolescents and young adults, where traditional advertising bans are often loosely enforced. This strategy targets not only those under 18 but also under 25, a group increasingly recognized as a priority population given rising vape uptake in this age range<sup>(28)</sup>.

**Predatory product design:** Vaping products are engineered with neon colors and toy-like designs (Toy pods) that resemble everyday items such as school supplies, video games, or cell phones. This design choice makes it easier for young users to attract children and evade parental supervision, since the products can pass as ordinary objects rather than nicotine delivery devices<sup>(20)</sup>.

**Flavors as the hook:** Flavors such as fruit, candy, and menthol are explicitly designed to attract young and first-time users by reducing the harshness of nicotine. Nearly 90% of middle and high school students who vape use flavored products, showing that flavor is central to youth uptake, not a minor feature<sup>(1)</sup>.

**Lifestyle and experiential branding:** The industry builds lifestyle branding around freedom, glamour, and personal style, distancing nicotine products from cigarettes' harsher image. This branding often borrows the visual language of tech and wellness culture rather than tobacco. Many brands have sponsored major music festivals with free flavor-trial booths and selfie stations to connect directly with young audiences in social settings where the products feel like part of the experience rather than a health risk<sup>(30)</sup>.

**The healthier alternative framing:** Vapes are also marketed as a healthier alternative to traditional tobacco products, reinforcing the harm reduction narrative from Pillar 2 and further lowers the perceived risk among new and existing users.



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**showing that flavor is central to youth uptake, not a minor feature.**



## 4. Supply Chain and Availability

Ensuring that a product is affordable and everywhere is a central commercial lever the industry uses to drive mass consumption.

**Retail oversupply:** Australia has more stores selling tobacco than petrol stations and supermarkets combined. This oversupply normalizes tobacco and nicotine products as ordinary consumer goods and makes effective regulatory oversight nearly impossible<sup>(1, 4, 22)</sup>.

**Predatory proximity:** Tobacco and vape retailers are often densely clustered in low-income areas and near schools, ensuring that products remain highly visible and accessible to the populations most vulnerable to uptake<sup>(32)</sup>.

**Distribution bypassing safeguards:** Products move through convenience stores, online channels, and informal markets that often bypass age verification altogether. Cross-border e-commerce further undermines national controls, since products bought online can evade restrictions that apply to domestic retail. Some tobacco retailers, particularly specialty food retailers, convenience stores, and tobacconists also serve as sites for illicit vape sales, blurring the line between legal and illegal supply chains, as research in Melbourne's western suburbs has directly documented<sup>(4, 22)</sup>.

**Price engineering:** To capture price-sensitive youth markets, the industry relies on coupons, bulk discounts, and low-cost disposables. Some companies exploit regulatory loopholes to offer product samples for USD 1, enticing young or first-time users to try the product<sup>(30)</sup>.



## 5. Information Environment

By funding industry-friendly research, companies shape scientific priorities and manufacture uncertainty around the long-term health risks of nicotine and tobacco products.

**Manufactured doubt:** The industry funds research that inflates harm reduction claims and downplays addiction risks, complicating what would otherwise be a clear scientific consensus. Rather than denying harm outright, this strategy introduces enough uncertainty that regulators hesitate to act<sup>(29)</sup>.

**Laundered science:** Some global organizations act as a legitimizing veil, passing industry funds to sympathetic researchers who produce studies and narratives that appear independent but ultimately serve industry interests<sup>(31)</sup>.

**Front groups and think tanks:** Beyond funding individual researchers, the industry relies on front groups and think tanks that promote tobacco harm reduction framing as a broader smokescreen, lending an appearance of scientific and civic legitimacy to positions that primarily protect industry revenue.

**Discrediting evidence:** The industry uses counter-research and media manipulation to undermine independent studies on tobacco harm and secondhand smoke, so that its own funded narratives can compete with, or drown out, findings from independent public health researchers<sup>(29)</sup>.

**Genuine scientific debate as cover:** Diverse views do exist among public health and tobacco prevention researchers, and this legitimate scientific debate has, at times, created further uncertainty. However, this genuine diversity of expert opinion is often exploited and amplified by industry-funded actors, making it harder for policymakers and the public to distinguish authentic scientific disagreement from manufactured doubt.



## 6. Narrative and Framing

The industry co-opts the language of public health to frame its commercial interests as aligned with the common good.

**Co-opting Harm Reduction:** Public health language around harm reduction is used to advocate for lighter regulation, framed as helping adult smokers quit. This lets the industry argue against restrictions that would otherwise apply to any new nicotine product entering the market<sup>(29)</sup>.

### **Individual choice versus corporate accountability:**

The industry frames nicotine consumption as personal responsibility and individual choice, deflecting attention from the systemic mechanisms, product design, marketing, pricing, distribution that the industry itself uses to drive addiction<sup>(13)</sup>.

**Framing regulators as the problem:** Public health organizations and government bodies advocating strict controls are often framed as anti-science, anti-cessation, or even pro-black market, shifting public attention away from industry practices and positioning regulators and advocates as the obstacle to progress<sup>(21)</sup>.

**Positioning industry as a health partner:** The industry positions itself as a public health partner rather than a driver of harm, with corporate social responsibility (CSR) activities such as disaster and pandemic relief to build social legitimacy, diverting attention from harmful practices to appear as a good corporate citizen even as it continues driving nicotine addiction<sup>(20)</sup>.





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**but transforming.**



# POLICY & REGULATORY LANDSCAPE

A fundamental tension shapes global regulation: health authorities push for comprehensive control, while commercial actors push for lighter, consumer-product-style rules to maintain market access. As of 2023, 34 countries ban e-cigarette sales entirely, 87 allow sales with some regulation, and nearly 40% have no regulatory action at all<sup>(28)</sup>. The 4 cases below show governments' varied responses from legislative overhauls to digital enforcement and prohibition.

## I Case A: Australia's Legislative Reset



### Context

For years, Australia's tobacco control framework was a patchwork of 8 separate laws, regulations, and court decisions, a structure the industry had learned to exploit. The government addressed this through 2 major pieces of legislation<sup>(27)</sup>.



### Tactic

The Public Health (Tobacco and Other Products) Act 2023, effective 1 April 2024, consolidated this patchwork into a single, modernized framework. It banned tobacco and e-cigarette advertising and sponsorship across all platforms including the internet, restricted appealing brand and variant names, updated graphic health warnings, and mandated health promotion inserts inside packs. It also created a new Illicit Tobacco and E-cigarette Commissioner within the Australian Border Force<sup>(6)</sup>.

This was followed by the Therapeutic Goods and Other Legislation Amendment (Vaping Reforms) 2024, effective 1 July 2024, which prohibited the importation, domestic manufacture, and sale of all non-therapeutic and disposable vapes. Vapes can now only be sold legally through pharmacies. People under 18 need a prescription. Favors are restricted to unflavored, mint, menthol, and tobacco<sup>(7, 26)</sup>.



### Outcome

This reform ended retail sales of vapes through convenience stores, tobacconists, and vape shops entirely, closing off the informal distribution channels described in Pillar 4 and shifting supply into a controlled, therapeutic channel.



### Lesson

Consolidating fragmented laws into a single framework allows governments to respond more effectively to new products and to meet international obligations such as the WHO Framework Convention on Tobacco Control (FCTC), rather than reacting to each new NENTP one at a time.

## Case B: Taiwan's Monitor, Remove, Block, Enforce Model



### Context

Taiwan's revised Tobacco Hazards Prevention Act (THPA) introduced a comprehensive ban on e-cigarettes on 22 March 2023. Despite this, the internet remained a major channel for illegal promotion and sales, prompting Taiwan's Health Promotion Administration (HPA) to build a long-term online monitoring and enforcement mechanism.



### Tactic

The HPA monitors 10 major digital platforms, conducting keyword surveillance 6 times a week. Violations are reported through the Consumer Policy Channel (CPC), which cooperates directly with Google and Meta to remove illegal content. The HPA also works with the Taiwan Network Information Center (TWNIC) to execute Domain Name System (DNS) suspensions, blocking access to offending websites entirely.



### Outcome

Between January 2025 and May 2026, the HPA identified 35,776 illegal online cases and achieved a 99.8% removal rate within 1-2 days on average. Over the same period, 6,512 illegal websites, including 636 domestic sites were blocked through DNS suspension. Enforcement penalties grew substantially year over year, from 735 cases and NTD 44.9 million in 2023 to 5,734 cases and NTD 416.1 million in 2025. Youth use also declined between 2022 and 2024: 18 to 29 year old usage fell from 2.2% to 1.9%, and university student usage from 5.3% to 3.8%.

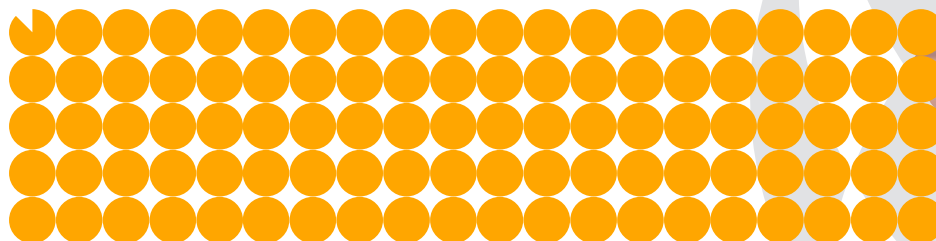


### Lesson

Legal enforcement alone is not enough against digital marketing. Direct platform cooperation, content removal mechanisms, and technical blocking need to work together. However, Taiwan's own experience shows the limits of this model too, since persistent social media violations, overseas-hosted websites, and rapidly evolving digital marketing tactics remain ongoing challenges, pointing to the need for AI-assisted monitoring and stronger international cooperation going forward.

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## Case C: Singapore's Zero-Tolerance Model



### Context

Singapore prohibits e-vaporizers entirely under its Tobacco (Control of Advertisements and Sale) Act (TCASA), a comprehensive law covering importation, sale, distribution, purchase, use, and possession<sup>(14, 15)</sup>. But in 2025, a new and more dangerous threat emerged: vapes were being used as delivery devices for psychoactive substances, particularly etomidate.



### Tactic

Singapore responded with an intensified whole-of-government framework, effective 1 September 2025, combining TCASA with the Misuse of Drugs Act and the Poisons Act to classify etomidate as a Class C controlled drug, enabling significantly higher penalties (Imprisonment). First-time etomidate offenders and repeat non-etomidate vape users are now subject to a three-month mandatory rehabilitation regime in place of immediate prosecution, combining strict enforcement with behavioral support<sup>(11, 16, 19, 17)</sup>.



### Outcome

By layering multiple pieces of legislation together, Singapore was able to respond quickly to a shift in how vapes were being misused, without needing to draft an entirely new law from scratch.



### Lesson

A total ban is not necessarily a static policy. Singapore's model shows that prohibition frameworks can, and need to, evolve rapidly as the industry and illicit markets find new ways to exploit nicotine products, in this case combining tobacco law with drug law to close a dangerous gap.

## Case D: Thailand's Policy Resilience<sup>(20, 21)</sup>



### Context

Thailand has maintained a total ban on e-cigarettes and heated tobacco products (HTPs) through multiple legal instruments, starting with a Ministry of Commerce ban on importation in 2014 and reaffirmed most recently through a Consumer Protection Board order in 2024.



### Tactic

Thailand's policy stance is grounded in medical evidence that nicotine impairs brain development from the fetus up to age 25, directly informing the government's decision to hold the line on prohibition rather than shift toward a regulated market model.



### Outcome

Despite intense industry lobbying to unlock the market, described in Pillar 2, an extraordinary Parliamentary commission recently recommended maintaining the total ban.



### Lesson

Comparative international evidence can be a powerful tool for resisting industry pressure. By pointing to what happened in countries that reversed their bans, Thailand's commission was able to justify continued prohibition on evidence rather than on precaution alone.



# BRIGHT SPOTS

While the previous sections show how the tobacco and nicotine industry exploits gaps in policy, this section highlights the opposite. These are cases where strong, coordinated regulation has genuinely shifted behavior and social norms in a positive direction. Three Australian case studies illustrate this clearly, alongside supporting evidence from the wider region.

## Case A: Impact of the 2024 Federal Vaping Reforms in New South Wales



### Context

Australia's pharmacy-only model for vape regulation, introduced through the 2024 Federal Vaping Reforms, is now producing measurable results among teenagers. Findings come from Wave 9 of the Generation Vape research project, run by Cancer Council Australia <sup>(8)</sup>.



### Evidence

Between April 2024 and October 2025, the proportion of teenage survey respondents in New South Wales who reported ever having tried vaping fell from 29.6% to 20.1%. Among 14 to 17 year olds specifically, 88.2% now report little or no experience with vapes, meaning they have either never tried one or had only a few puffs. Heavy use is also declining sharply, with the proportion of teens who had vaped 100 or more times dropping from 6.4% to 2.6% over the same period.

The reforms appear to be working on more than just access. Exposure to vape advertisements on TikTok fell from 18.9% to less than 9%, showing that the 2024 advertising and promotion ban is reducing a major driver of youth initiation. Social norms are shifting alongside these numbers too, since teens are now less likely to believe vaping is common among their peers, and most agree that vaping is unsafe and addictive <sup>(8, 9)</sup>.

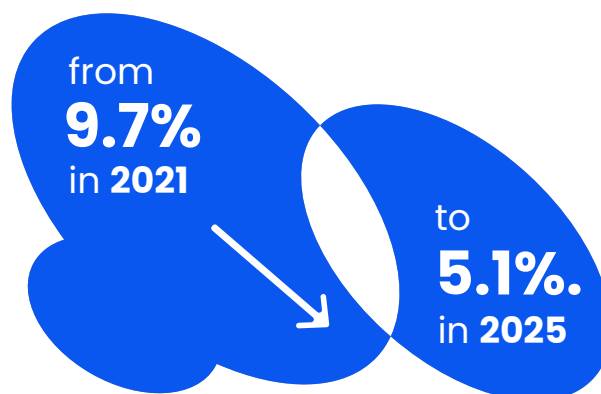


### Lesson

When access restrictions, advertising bans, and public health messaging are introduced together, they can shift not just individual behavior but the broader social environment that normalizes youth vaping in the first place.

The improvement is strongest among young adults, with daily smoking among 15 to 29 year olds nearly halving,

Smoking among 30 to 59 year olds fell from 11.8% to 9.9% over the same period



## Case B: South Australia's Record-Low Smoking Rates

### Context

South Australia has achieved its lowest smoking rate on record, positioning it as a national leader in tobacco control.

### Evidence

The state's daily smoking rate fell to 7.5% in 2025, down from 10.6% in 2020, keeping it on track to meet its target of 6% by 2027. The improvement is strongest among young adults, with daily smoking among 15 to 29 year olds nearly halving, from 9.7% in 2021 to 5.1%. Smoking among 30 to 59 year olds fell from 11.8% to 9.9% over the same period, and smoking among people living with mental illness (General or severe), a population that typically faces much higher smoking rates, fell from 16.6% to 12.3%. The average age at which people start smoking has also risen, from 16 years in 2019 to 17 years.

South Australia has positioned itself as a national leader in tobacco control through a comprehensive approach that combines legislative and regulatory reforms to reduce the supply of tobacco and e-cigarette products with social marketing and programmatic initiatives to reduce consumer demand. Preventive Health SA plays a key role in this effort, leading the delivery of several initiatives, including the world-leading Incentive to Quit (I2Q) pilot.

The program focuses on high-prevalence, vulnerable groups in low-income areas and offers financial incentives, including supermarket vouchers worth up to AUD 150, for reaching cessation milestones. In its first two years, the I2Q pilot itself recruited 434 clients and achieved a validated abstinence rate of 33.6%, confirmed through carbon monoxide testing for smokers and saliva cotinine testing for vapers. The program also trained 336 health professionals to deliver brief cessation advice, integrating this support directly into existing clinical workflows rather than treating it as a separate service.

### Lesson

Broad regulatory reform works best when paired with targeted, well-funded support for the groups most affected by nicotine dependence, rather than relying on population-wide policy alone.

## Case C: The ACOSH National Illicit Tobacco Ladder<sup>(4, 5)</sup>



### Context

In 2026, the Australian Council on Smoking and Health (ACOSH) introduced a National Illicit Tobacco Ladder, a state-by-state league table designed to drive accountability and transparency in how Australian jurisdictions respond to the illicit tobacco crisis.



### Evidence

The ladder ranks states and territories based on supply chain controls, ministerial leadership, and on-the-ground enforcement. Queensland and South Australia emerged as clear front-runners, scoring 76% and 67% respectively, reflecting proactive and swift enforcement responses. By contrast, the Northern Territory and the Australian Capital Territory scored only 21% and 26%, showing a sharp drop-off in performance across the rest of the country.



### Lesson

Public benchmarking can be a powerful accountability tool. By naming which states are leading and which are lagging, the ladder creates pressure for underperforming governments to rebuild enforcement frameworks and tighten licensing systems, so that only trustworthy retailers are permitted to sell tobacco.



### Regional Highlights

**Thailand** introduced plain packaging for tobacco products, stripping away the branding and design elements the industry relies on, reflecting broader resistance to industry pressure.

**Taiwan** HPA's digital enforcement model achieved 99.8% online content removal rate between 2025–2026, standing as a genuine bright spot in its own right.

**Singapore** closed a regulatory gap by combining its Tobacco Act with drug-control laws (Misuse of Drugs Act and Poisons Act), enabling strict penalties and mandatory rehabilitation for etomidate-laced vapes.



## CDOH CASE STUDY 3:

# GAPS AND LOOPHOLES

Despite significant legislative progress, commercial actors and criminal networks continue to exploit structural gaps and legal loopholes to maintain product availability and political influence. Comprehensive enforcement is as essential as the ban itself; otherwise, illicit markets can exploit enforcement gaps just as easily as legal ones.

## Case A: The Enforcement and Retail Oversight Gap



### Context

While federal laws (mirrored by state laws in some jurisdictions) in Australia establish national bans on products such as disposable vapes, enforcement on the ground is largely a state responsibility. This creates room for significant variation in how effectively these bans are applied.



### Gap

The ACOSH Illicit Tobacco Ladder, discussed in the Bright Spots section, reveals that while some states are proactive, others are described as totally off pace, creating weak points in the national net that illicit traders can easily exploit. This unevenness is compounded by retail oversupply. This density makes routine inspection nearly impossible and provides a kind of legitimacy veil for retailers who sell both legal products and illicit vapes or tobacco under the counter<sup>(4, 10, 22)</sup>.

A further gap has emerged from the therapeutic pathway itself. While Australia's reforms direct users toward pharmacies for legal access to vapes, some commentators argue that strict restrictions on nicotine liquid have effectively banned the use of vapes, since few doctors are prepared to prescribe vapes for cessation. This has unintentionally diverted users toward a thriving illicit market instead<sup>(27)</sup>.



### Consequence

Criminal syndicates increasingly favor the illicit tobacco and vape market because penalties here are historically lower than those for other illicit commodities like narcotics, even though the same smuggling methods are used. This deterrence gap makes the sector highly attractive for organized crime<sup>(10, 27)</sup>.



### Lesson

A national ban is only as strong as its weakest state-level enforcement, and gaps in prescriber access can push users toward exactly the illicit markets that regulation is meant to shut down.

## Case B: The Digital and Online Loophole



### Context

Even where advertising bans are legally comprehensive, enforcing them online remains far harder than enforcing them in physical retail spaces.



### Gap

In Australia, the Public Health (Tobacco and Other Products) Act 2023 bans online advertising, but enforcement remains a significant challenge for content hosted on overseas social media platforms like TikTok and Instagram, since these platforms sit outside direct domestic jurisdiction. Online vendors also shift domains frequently and use hidden marketing techniques to bypass surveillance<sup>(8, 9, 28)</sup>.

Taiwan's high-velocity model, described earlier, achieves a 99.8% removal rate for content it identifies. Yet even this system faces the same underlying limitation, since overseas-hosted websites remain a persistent barrier to total digital control, and commercial actors continually adapt their keywords and platforms to evade automated surveillance.



### Consequence

Enforcement becomes a constant chase rather than a fixed solution, since removing content domestically does not stop it from reappearing on a server or platform based elsewhere.



### Lesson

Digital enforcement needs international cooperation, not just domestic legal authority, since the industry's marketing infrastructure is not bound by national borders in the way retail supply chains are.

## Case C: Legislative and Institutional Gaps



### Context

Beyond enforcement, some of the most durable gaps exist directly inside the legislative and political process itself.



### Gap

In Australia, while most tobacco advertising is banned, the Nationals remain the only major federal political party that still accepts donations from the tobacco industry. Current federal reforms also explicitly carve out exceptions for tobacco and e-cigarette sponsorship in relation to political donations and electoral expenditure, allowing industry money to maintain a presence in the political ecosystem even under a strict advertising regime<sup>(27)</sup>.

The industry also exploits a therapeutic versus consumer electronics arbitrage, consistently attempting to classify NENTPs as consumer electronics to avoid the stricter regulatory frameworks and access lighter standards for ingredients and marketing. In some regional jurisdictions, governments have yet to establish mandatory disclosure procedures for interactions between public officials and the tobacco industry, leaving the door open for covert lobbying of the kind described in Pillar 2<sup>(28, 33)</sup>.



### Consequence

These gaps allow industry influence to persist inside the very institutions responsible for regulating it, even in countries with otherwise strong tobacco control laws.



### Lesson

Product bans and advertising restrictions are not enough on their own. Political donation rules and mandatory lobbying disclosure need to be closed as tightly as product-level loopholes, or industry influence simply moves upstream into the policymaking process itself.

## Case D: Singapore's Novel Delivery Gap



### Context

Singapore maintains one of the world's strictest bans on e-vaporizers, covering the entire spectrum of import, sale, distribution, and possession.



### Gap

This comprehensive ban was built to stop nicotine products, not to anticipate drug delivery. When vapes began being used to carry etomidate, a psychoactive substance entirely unrelated to nicotine, the law had no built-in mechanism to respond, exposing a structural blind spot between tobacco control law and narcotics law<sup>(11, 16, 19, 17)</sup>.



### Consequence

Singapore had to act quickly and layer on two additional pieces of legislation, the Misuse of Drugs Act and the Poisons Act, rather than having this flexibility built into the tobacco law from the start<sup>(14, 15, 18)</sup>.



### Lesson

Even a total ban is not future-proof. As products evolve to deliver substances the original law never anticipated, regulatory frameworks need built-in mechanisms to adapt quickly, rather than waiting for a new crisis to force reactive legislation.

**Singapore** maintains one of the **world's strictest bans** on e-vaporizers





# EMERGING THREATS

The tobacco and nicotine landscape is shifting rapidly, and new products and illegal market dynamics are putting decades of public health progress at risk. Four cases below capture the most critical emerging threats currently facing the region.

## Case A: The Illicit Tobacco Crisis



### Context

Australia has successfully adopted strong measures to reduce the appeal and demand for tobacco, including world-first plain packaging laws and comprehensive advertising bans. However, laws controlling the sale and supply of tobacco have remained comparatively weak, and this gap has fueled a growing illicit market that now threatens to undermine the country's world-leading tobacco control record.



### Threat

Illicit tobacco bypasses every evidence-based demand reduction policy Australia has built, including graphic health warnings and high excise taxes. By offering cheaper, fully branded products outside the regulated system, illicit sellers make tobacco more affordable and accessible, which risks enabling initiation among non-smokers and undermining quit attempts among current smokers. Youth access is also a growing concern, since sellers operating outside Australian law are less likely to enforce age verification. Beyond taxation, the illicit trade has become a driver of organized crime: syndicates channel tobacco profits into other harmful activities, fueling a rise in community violence; homicides, extortion, and firebombed retail premises among them.



### Evidence

The Illicit Tobacco and E-cigarette Commissioner's Report 2024–2025 estimates the illicit market now comprises approximately 55% of the total Australian tobacco market (Estimated range: 50%–60%), valued at roughly AUD 5.6 billion, with between AUD 7.7 billion and AUD 11.8 billion in evaded excise revenue. Youth vulnerability appears especially evident, since data from the Generation Vape project shows that nearly 80% of tobacco purchases by young adults aged 18 to 24 were classified as likely illicit, driven primarily by price sensitivity<sup>(10)</sup>.



### Lesson

Demand-side policies alone, such as packaging and advertising restrictions, cannot succeed without equally strong supply-side enforcement. A gap between supply and demand controls does not just slow progress. It can actively reverse it and open the door to organized crime.

## I Case B: Psychoactive Additives in Vaporizers



### Context

Beyond nicotine, vapes in Singapore became a new delivery system for etomidate, a potent psychoactive substance as discussed in Case C of Policy and Regulatory Landscape section.



### Threat

Singapore identified a rise in vaporizers containing etomidate, a potent psychoactive substance not originally intended for recreational or unsupervised use. Abuse of etomidate through vapes can cause serious psychiatric effects, including suicidal behavior, along with physical confusion, loss of consciousness, and potentially fatal disruptions to heart rhythm and hormone balance.



### Evidence

This threat was serious enough to require an intensified whole-of-government response in 2025, which reclassified etomidate as a Class C controlled drug to allow for tougher enforcement and mandatory rehabilitation for users.



### Lesson

Nicotine delivery devices can be repurposed as delivery systems for entirely different and more dangerous substances, which means tobacco control frameworks need built-in flexibility to respond to threats that were never part of the original policy design.

## I Case C: Predatory Marketing and Toy Pods



### Context

In Thailand and across the broader region, the industry is using increasingly predatory tactics to target younger demographics, building directly on the product design strategies described in Pillar 3.



### Threat

The industry has introduced toy pods, vaping devices designed with aesthetics specifically intended to attract children, including grade schoolers. These designs often resemble cartoon characters, school supplies, or video games, allowing them to evade detection by parents and teachers.



### Evidence

Beyond the immediate health risks of nicotine exposure, these products function as a gateway to lifelong nicotine dependence and, in some cases, to the use of other addictive substances later in life.



### Lesson

Product design itself can be a form of predatory marketing. Regulation that only addresses advertising content, without addressing the physical design of the product, leaves a significant gap for the industry to exploit.



In January 2025,  
**South Australia** became  
the first Australian jurisdiction to  
**prohibit nicotine pouches.**

## Case D: The Rise of Nicotine Pouches



### Context

Nicotine pouches are often promoted as tobacco-free or smoke-free. This framing helps them fall into regulatory gaps that were originally built around combustible tobacco and vapes.



### Threat

These products rely on the same digital siege strategy described in Pillar 3, using celebrity endorsements and music culture to normalize usage among youth. Because they are new to many markets, existing tobacco and vaping regulations often do not clearly apply to them yet.



### Evidence

Current use of nicotine pouches in some jurisdictions, including Australia, remains relatively low, at around 2%. However, health advocates warn that this figure could escalate rapidly if retail bans are not strictly enforced from the outset, pointing to the United States, where nicotine pouch use has grown substantially in markets without early, comprehensive restrictions<sup>(1, 8, 9, 31)</sup>. In January 2025, South Australia became the first Australian jurisdiction to prohibit nicotine pouches.



### Lesson

A product does not need to be widely used yet to represent a serious threat. Waiting until usage rates climb before regulating a product gives the industry a critical head start in normalizing it among young users.



# POLICY ADVOCACY

Policy advocacy is the strategic process by which health promotion foundations and civil society organizations work to advance public health priorities, including by limiting conflicts of interest, such as commercial influence through evidence-based regulation. Such advocacy focuses on reclaiming the public health narrative, ensuring the tobacco and nicotine industry do not end up dictating government policy.

## Case A: Responding to Secret Industry Influence



### Context

Australia's tobacco control faced a significant advocacy battle in May 2026, when the tobacco industry was granted a secret briefing, in private and absent from the public witness schedule, to a Federal Senate Inquiry into Illegal Tobacco. Not since 2010 had the industry been invited before an Australian government inquiry, and never before behind closed doors. The stakes were considerable: the ABC separately reported that organized crime groups had earned between AUD 4.1 billion and AUD 6.9 billion from the illicit tobacco trade in 2024–2025 alone<sup>(3)</sup>.



### Advocacy Response

The health sector responded with unified and public condemnation. The Australian Council on Smoking and Health (ACOSH) called the move a covert attempt to influence policy in the industry's own financial interest, and to dramatize the human cost, ACOSH advocates laid 66 body bags on the lawn of Parliament House, representing the number of Australians who die every day from tobacco-related disease. The Public Health Association of Australia (PHAA) moved quickly to counter the industry's parallel push for a tobacco excise cut, calculating that a 50% reduction in customs duties would hand multinational tobacco companies an estimated AUD 2.3 billion annual windfall, including more than AUD 1 billion to British American Tobacco alone. 15 leading health organizations went further, signing a joint open letter ahead of World No Tobacco Day to expose how the industry was using concerns about illicit tobacco as cover to gain influence over Australia's tobacco laws. Other health leaders who had testified publicly, using their own names and faces, publicly questioned why the industry alone was granted anonymity<sup>(23, 24)</sup>.



### Outcome

The pressure prompted the Federal Health Minister to publicly seek further information about the decision and to remind parliamentary colleagues of their obligations under WHO FCTC Article 5.3, which requires shielding public health policy from tobacco industry interference. The inquiry's findings and the industry's proposed tax cut are still pending<sup>(33)</sup>.



## Lesson

Advocacy does not need a policy outcome to be effective. By acting fast, publicly, and with concrete figures rather than general objections, health organizations reframed the debate from illicit tobacco enforcement to industry transparency and undue influence, forcing government accountability regardless of the inquiry's conclusion.



## Case B: Countering the Harm Reduction Smokescreen



### Context

In Thailand, the industry mounted a sustained digital and political campaign to try to overturn the country's national ban on e-cigarettes, using the harm reduction framing described in Pillar 2 and Pillar 6 of this briefing.



### Advocacy Response

Thai public health organizations, including the Tobacco Control Research and Knowledge Management Center (TRC) and ThaiHealth, worked to expose the funding links between local pro-vape groups, such as End Cigarette Smoke Thailand (ECST), and multinational tobacco companies, tracing the money back through the Philip Morris-backed Foundation for a Smoke-Free World. Advocates also worked to debunk pro-vape research directly, including a widely circulated policy study, by exposing the authors' long-standing financial ties to the tobacco industry and the absence of genuine peer review behind the findings<sup>(12, 20, 21, 25)</sup>.



### Outcome

This sustained advocacy contributed to the Thai Parliament's extraordinary commission recommending that the country maintain its total ban on e-cigarettes, prioritizing protection of the developing adolescent brain over commercial market expansion.



## Lesson

Countering industry narratives effectively often requires two things done together, tracing the funding behind seemingly independent voices and challenging the scientific credibility of the evidence itself, rather than relying on either strategy alone.



# STRATEGIC COMMUNICATION

Strategic communication is the tactical use of messaging and platforms to shift social norms, improve health literacy, and counter the digital siege of industry marketing described in Pillar 3. It focuses on reclaiming the narrative through trusted voices and peer-led interventions, rather than relying on regulation or clinical treatment alone.

## Case A: UNCLOUD Campaign



### Context

UNCLOUD is a health promotion campaign designed to address youth vaping by prioritizing authentic peer-to-peer communication over traditional top-down regulatory messaging. It targets young people aged 14 to 25, directly aligned with VicHealth's priority population.



### Strategy

UNCLOUD operates as a digital platform providing evidence-backed information on vaping harms, but its core strength is peer-led storytelling, giving young people a safe space to share experiences and warn one another, built on the idea that they trust peers more than official health messaging. In August 2024, the Victorian Government invested AUD 2 million to expand the campaign into a genuine cross-sector coalition, engaging more than 30 local councils, 5 universities, and 5 major sporting bodies, including Swimming Victoria, Athletics Victoria, and the Deakin Melbourne Boomers, all of whom now promote the platform at events and across social media. The project also partners with the Alcohol and Drug Foundation to upskill sporting club coaches directly as anti-vaping educators, turning existing community leaders into messengers rather than relying solely on new campaign faces.



  
**Outcome  
and reach**

The campaign now touches young people across 3 overlapping networks at once, sport, local government, and tertiary education, rather than through a single national advertising channel, embedding itself in everyday spaces rather than requiring them to actively seek out health information.

  
**Lesson**

Health promotion foundations can act as conveners, mobilizing trusted community institutions around a shared goal, rather than trying to compete directly with industry marketing using the same channels. Peer voice, not authority, is the mechanism doing the work here.

## Case B: Hard-Hitting Media Campaigns

  
**Context**

South Australia paired its new smoke-free and vape-free outdoor area laws with a public communication strategy designed to explain both the health risks of vaping and the changing legal landscape.

  
**Strategy**

Campaigns titled 'Do you know what you're vaping' and 'Vape Truths' were licensed from interstate to highlight the specific toxic chemicals found inside vapes, making the health risk concrete and specific rather than abstract. These public-facing campaigns were directly integrated with in-school education, reinforcing the same messaging both in public and in the classroom.

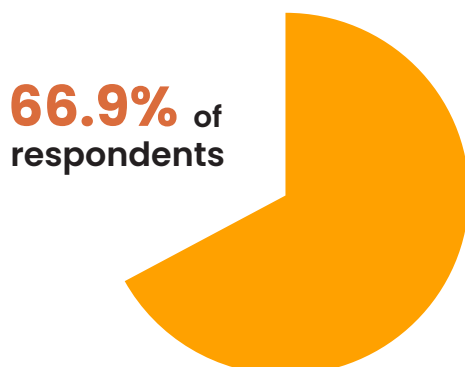
Alongside these campaigns, the locally produced 'Clearing the Air' public education campaign was aired to raise awareness of South Australia's new smoke-free and vape-free outdoor area laws established in March 2024.

  
**Outcome  
and reach**

By connecting the anti-vaping public campaign to the school curriculum, South Australia reached young people through both organic and paid channels at once, rather than relying on public campaigns alone to change behavior outside a supervised setting. Additionally, 66.9% of respondents from a regular Population Health survey (Population Health Survey Module System, March/April 2024) reported awareness of South Australia's new smoke-free and vape-free outdoor area laws, having seen, read, or heard about them through the 'Clearing the Air' campaign, proving the effectiveness.

  
**Lesson**

Enforcement and communication work best as a paired strategy. Strict penalties alone do not build public understanding of why a product is harmful, and public campaigns alone do not carry the deterrent weight of enforcement. Together, they reinforce each other.



reported awareness of South Australia's new smoke-free and vape-free outdoor area laws, having seen, read, or heard about them through the '**Clearing the Air**' campaign.

## Case C: Integrated Whole-of-Government Education



### Context

Singapore's approach to strategic communication is deeply embedded in its broader whole-of-government framework, particularly following the classification of etomidate as a controlled drug in September 2025, discussed earlier in this briefing.



### Strategy

Public education about the harms and illegality of vaping is delivered across nationwide public transport, borders, and uniformed services, making the message part of everyday public life rather than confined to health settings. In partnership with the Ministry of Education, anti-vaping education is built directly into the school curriculum, supplemented by School Health Advisors and new virtual counseling services for youth. Singapore also runs centralized digital resource hubs, Healthhub and Parenthub, to give parents and the wider population a single, reliable source of information that can compete directly with industry misinformation.



### Outcome and reach

By embedding the message across transport, schools, and centralized digital hubs simultaneously, Singapore ensures that no single population group, whether students, parents, or commuters, is left without consistent, government-verified information.



### Lesson

Strategic communication is most effective when treated as permanent public infrastructure rather than a time-limited campaign. Centralized, government-run information hubs give the public a stable place to verify claims, rather than leaving them to sort fact from industry messaging alone.



### Countering the Digital Siege

Vaping is no longer universally viewed by youth as an aspirational behavior, with a growing number of teens expressing embarrassment or shame associated with being a vaper. This shift in social norm is precisely the outcome that Pillar 6 described the industry working hard to prevent, and it suggests that peer-led, in-school, and infrastructure-based communication strategies are beginning to work.



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