



Consultation response

Tobacco and vapes: packaging, appearance and display

September 2026

UK Government open consultation – Tobacco and vapes: packaging, appearance and display

Children in Scotland response

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About Children in Scotland

Children in Scotland is a welcoming and dynamic charity that amplifies the voices, views and experiences of our members and children, families and professionals across Scotland. We achieve this through direct services, meaningful participation, policy work, inspiring communications and sector-leading events and learning opportunities.

We are a vibrant and inclusive community of dedicated individuals and organisations who use our skills and passion to bring evidence-based and fresh thinking together, with one shared aim of giving all children in Scotland an equal chance to flourish.

We are stronger together in driving lasting impact for Scotland's children.

Our response

Children in Scotland is pleased to respond to the UK Government consultation on Tobacco and vapes: packaging, appearance and display. In our 2026 Scottish Parliament election manifesto we called on the Scottish Government to 'Strengthen efforts to protect childhood health by addressing the commercial determinants that shape harmful consumption patterns, including marketing practices, pricing strategies, and the availability of health information'¹. We see this consultation as being a key mechanism for responding to these commercial determinants of health.

Across our work we have consistently heard from children and young people about the prevalence of vaping products and their concerns about the impact on their health and wellbeing. Changing our World is Children in Scotland's children and young people's advisory group. Its members are aged between 8-25 and come from a variety of different backgrounds, bringing their own unique perspectives, experiences, and views. They inform

¹ Children in Scotland Manifesto 2026. Access here: [Manifesto 2026 | Children in Scotland](#)

all aspects of our work from our strategic planning to recruitment of staff to the planning and delivery of our annual conference.

Vaping has long been a key focus for Changing Our World, with the group identifying this as a key topic across their work in 2023 where they explored the impact of vaping and the needs of children and young people. Supported by Children in Scotland staff, members of Changing our World contributed to a Children in Scotland evidence paper², met with the Minister for Public Health and Women's Health, delivered a workshop at Children in Scotland's annual conference with Fast Forward, and won a Children's Health Award. Our response to this consultation is directly informed by the work Changing our World have done on this topic.

Ultimately, the regulation and control of the packing, appearance and display of vaping products is a children's rights issue. Issues relating to the packaging, appearance and display of vaping products interact with children's rights to grow up in a healthy environment (Article 24), to have appropriate access to information (Articles 13 and 17), to education (Article 28), and to be protected from harmful information, including that in the digital world (Article 17).

Evidence links vaping in children and young people with harm to lung and brain development³, mental health, dental health, and allergies⁴. However, the full long-term implications of vaping are yet to be understood. While Children in Scotland recognises that vapes and e-cigarettes may be used as a tool for those who want to stop smoking, more must be done to stop health harming products being marketed and sold to children and young people and to discourage the initiation of vaping and nicotine use.

Children in Scotland welcomes this consultation on the packaging, appearance, and display of vapes as a mechanism for responding to these issues. We support aligning vape and nicotine product marketing and packaging restrictions with tobacco laws and including consumer health warnings. We would also welcome further action from the UK and Scottish Government to continue to consider tighter restrictions on selling and purchase of vaping products, as well as further research on the potential harms of vaping and nicotine-containing products for young people.

²Changing Our World evidence paper (2023). Access here: [Changing Our World Vaping Evidence Paper - Children and Young People's Evidence Bank](#)

³ NHS [Young people and vaping - Better Health - NHS](#)

⁴ Oyella P, Gilchrist FJ, Talawila Da Camara N, *et al* (2026), Impacts of vaping on children and young people: a systematic review, *Archives of Disease in Childhood*. Accessed here: [Impacts of vaping on children and young people: a systematic review | Archives of Disease in Childhood](#)

Children in Scotland has chosen not to respond to the specific questions contained within this consultation paper due to the nature of the evidence we have on this topic. Instead, we have chosen to focus our response on two main sections of the consultation:

- Vaping and nicotine product packaging and flavour descriptors
- Vape device appearance

These elements of the consultation are explored across key headings below:

- Packaging and Marketing
- Social media advertising, selling and display of vapes
- Vape Devices
- Product and Consumer Information

Packaging and marketing

Children in Scotland supports proposals to restrict the packaging and marketing of vaping, e-cigarette and nicotine products to limit their appeal to children and young people.

Despite the legal minimum age for purchase being 18, vape products are often designed, packaged, and marketed in a way which appeals to children. Using child friendly packaging to market health-harming substances to children does not allow young people access to their right to health and a healthy environment (Article 24), nor is it in the best interests of the child (Article 3).

In their evidence paper on disposable vapes, members of Changing Our World highlighted that the bright, eye-catching colours and the range of flavours draw young people's interest. Group members discussed the use of food and fruit related flavours, noting that young people are more likely to try flavours such as "fizz wizz", "just juice", or "Bluey's chews" as they sound like sweets. The group told us that vapes are sometimes even found in sweet aisles at shops, further aligning them with child-like foods and increasing the appeal to children and young people.

They have childish flavours and are always adding new ones which means young people try them and spend more money on them" (Member of Changing our World)

The group told us they feel like companies are targeting this marketing at young people, encouraging them to start vaping. This perspective has been

backed up by academic research, where a UK study with groups of young people linked familiar, sweet flavours with a higher likelihood of trying vapes⁵.

Changing Our World has been clear that they want to see stronger legislation and regulation to restrict the branding, marketing, and packaging of vaping products. They have articulated that this should aim to align with legislation around marketing, branding, and packaging of cigarettes.

The group has also articulated that vaping products should not be allowed to have bright and colourful branding, imagery, or otherwise, and are confident that that this would make vape products less eye-catching or appealing to children and young people.

Children in Scotland fully supports these positions and would support action from the UK Government in this area. We also support measures to restrict the advertising of compelling flavour profiles, particularly food-related flavour descriptors which mimic sweets, fruit, or flavours that are recognisable and appealing to children.

Social media advertising, selling and display of vapes

Studies have found links between promotion of vapes and e-cigarettes through media channels (e.g. TV and social media) and positive perceptions of vaping among young people⁶. This includes social media where the use of celebrities or known public figures in advertising may increase the trustworthiness of products like vapes⁷.

Changing Our World reported the prevalence of vape and e-cigarette advertising in the online spaces they access and called for tighter restrictions on the advertising of vaping products online. Many young people use social media and are regularly exposed to the positive promotion of vapes and nicotine containing products on social media channels which may directly influence their understanding of these items, and their desirability⁸. Children in Scotland advocates for a rights-respecting approach to vape and nicotine

⁵ Taylor E, et al. (2025) *Association of fully branded, standardized packaging and limited flavor and brand descriptors of e-liquids with interest in trying products among youths in Great Britain*. Accessed here: <https://doi.org/10.1111/add.16763>

⁶ Smith MJ, Hilton S, (2023) *Youth's exposure to and engagement with e-cigarette marketing on social media: a UK focus group study*. Accessed here: [Youth's exposure to and engagement with e-cigarette marketing on social media: a UK focus group study | BMJ Open](#)

⁷ University of York (2024) *Social media adverts impact vaping behaviours among young people, study shows*. Accessed here: [Social media adverts impact vaping behaviours among young people, study shows - News and events, University of York](#)

⁸ As above

advertising, with strong restrictions on promotion to children and young people under 18, including via social media channels.

Changing Our World has also highlighted that vaping products are often highly visible in shops, the group has recognised the contrast between this and how cigarettes and tobacco products are covered and locked away. The group has been clear the laws controlling the visibility of vaping products in shops should match those for cigarettes, ensuring they are hidden from view. Children in Scotland supports this view and calls for stronger legislation and policy to restrict the visibility of vape, e-cigarette and nicotine containing products.

Vape devices

Changing Our World told us that the variety of flavours, design and technology of vaping products encourages young people to buy the newest design, colour, or flavour, almost turning them into a collectable item. The group described that vapes often seem “cool” or have a social status attributed to them. We have heard examples of some young people wearing them around their necks like an accessory. Members of the group have told us about the pressure that this social status puts on children and young people to buy and smoke vapes, so they are not left out.

*“Vaping is the popular thing to do – you feel pressure to have a puff”
(Member of Changing Our World)*

With this in mind, we believe that proposed legislation around vaping should take action to regulate the design and development of vaping products to make them plain and less appealing to children. This should include restricting digital screens, sensory elements such as glossy or tactile materials, bright colours, and art works on vapes and nicotine products. We also support restrictions on the shape of vapes, especially if they are designed to make them feel desirable to young people, or easy to conceal.

Product and consumer information

Article 17 of the UNCRC outlines children's rights to information, including information about health and protection from harmful information. Changing Our World has told us they want to see more information about the health and wellbeing impacts of vaping, calling for this to be clearly stated on all packaging. Children in Scotland supports proposals to have consistent nicotine and health warnings. This may be better placed on the outside of

packaging, or on the device itself rather than solely as an additional leaflet, for easier consumer engagement.

While there is a lack of longitudinal research and data about the health implications of vaping, young people have consistently shared their concerns about the long and short-term impacts of vaping with us.

It is also important to highlight that while vaping is often presented as a less harmful alternative to smoking, or as a tool for smoking cessation, we have heard confusion from young people over this messaging, especially for those who do not already smoke. Young people have expressed that such messaging gives a false sense of the harms that vaping can cause and can be seen as a 'healthy option'⁹ when in reality, the potential risks to children and young people are not fully understood.

Children in Scotland fully supports measures to provide accurate, clear, and consistent consumer information and health warnings on packaging, bringing this in line with cigarette and tobacco products. This includes information about nicotine strength, ingredients list including flavour agents, a standardised age restriction symbol, expiration details, and warnings of the health impacts of products.

For further information, please contact Chris Ross, Participation and Policy Manager, Children in Scotland, cross@childreninscotland.org.uk

⁹ Changing our World and Children in Scotland - Vaping Evidence Paper (2023) [Changing Our World Vaping Evidence Paper - Children and Young People's Evidence Bank](#)