



29 May 2023

The Honourable Amber-Jade Sanderson MLA
Minister for Health; Minister for Mental Health
5th Floor, Dumas House, 2 Havelock Street
West Perth WA 6005

Dear Ms Sanderson,

As a Population Health and Health Promotion Professor at Curtin University in Western Australia, I lead an international team researching e-cigarettes (vapes) and how they are promoted on social media platforms.

There is mounting evidence that e-cigarette products (with and without nicotine) are being promoted and advertised on social media through influencers and user-generated content [1–4]. This type of content is dominated by positive, pro-vaping messages [1,5] which act to shape e-cigarette-related culture and norms, and contributes to the view that e-cigarette use is common and socially accepted [6,7]. These messages may be particularly impactful on youth [8], due to their high rates of social media use [9].

Recent research investigating the influence of exposure to e-cigarette content on social media platforms [1,6,9] has found an association between exposure to social media posts featuring e-cigarettes and their increased use, lower perceptions of harms and more positive attitudes towards e-cigarettes [1]. Both e-cigarette advertising and user-generated content have been linked with a greater likelihood of e-cigarette use [9], with some noting that TikTok creators are in effect marketing e-cigarettes on behalf of the tobacco industry [6].

TikTok, one of the fastest-growing social media platforms [10] had 1.2 billion monthly active users in 2022 [11]. The platform is particularly popular among young people, with 43% of its users aged between 18 and 24 years [12]. In 2022, TikTok acted on content that violated its policies, claiming to remove content that did not meet approved content posting criteria, including posts about products such as e-cigarettes [12]. Despite this, users are still routinely exposed to e-cigarette content on TikTok and other social media platforms [4]. Current social media content policies are often complex, and it is unclear as to what exactly is prohibited. Furthermore, policies to restrict tobacco promotion are insufficient and confusing [3].

Our research

We recently studied how e-cigarettes are being promoted on selected TikTok accounts, to understand the effectiveness of TikTok's 'Drugs, controlled substances, alcohol and tobacco' policy. Of the 264 e-cigarette-related videos reviewed, we found:

- Almost all videos (97.7%) portrayed e-cigarettes positively.
- Only 2% of posts referenced vape or nicotine addiction.
- 50% of the videos referred to a vaping community, which can act to shape social norms for e-cigarette use and increase the perception that vaping is socially accepted [13].
- Over a quarter (26.1%) of posts violated TikTok's content policy and promoted vaping products for purchase.

You can access our published study here: <https://www.mdpi.com/1660-4601/20/10/5761>.

Our research shows the shortcomings of relying on platforms to develop and enforce their own social media content policies, as despite influencer industry guidelines and platform policies demanding transparency and disclosure, in reality, in-kind and paid promotions and product placement are frequently not clearly labelled and divulged, leaving it up to audiences to read between the lines.

Currently, there are no significant consequences for those who violate TikTok's content policy [14]. Social media platforms can decide the consequences for breaches of their policies, but they have a clear financial incentive not to penalise people who breach their policies. There is a need for social media policy wording to be modified to capture all posts promoting e-cigarettes, and the need for transparent enforcement of these policies.



Government regulation that captures (nicotine and non-nicotine) e-cigarette advertising, promotion and sponsorship, including on social media, is needed. The WHO Framework Convention on Tobacco Control encourages all parties (of which Australia is one) to include e-cigarettes in existing comprehensive tobacco promotion and advertising bans [15]. Strict government legislation exists federally regarding traditional tobacco [16] and this must be modified to clearly apply to (nicotine and non-nicotine) e-cigarettes, particularly online.

Given the high rates of youth participation on social media, and the evidence linking social media messaging with e-cigarette use, there is a strong case for strengthening policies and regulations around the promotion of e-cigarettes on social media. While policies to restrict content promoting tobacco products, which also include e-cigarettes, currently exist on most social media platforms, there is a need for transparency around processes (e.g., moderation and enforcement) tighter restrictions and penalties [3].

We have recently completed the same investigation of Instagram (yet to be published) and have found similar results to those highlighted here on TikTok. We would welcome the opportunity to discuss our research findings with you or your team. If you would like further information or a meeting, then please contact me at any time. We look forward to your response.

Yours faithfully,

A handwritten signature in cursive script that reads "Jancey".

Dr Jonine Jancey
Professor, Curtin School of Population Health
J.Jancey@curtin.edu.au | 08 9266 3807

On behalf of the research team: Professor Tama Leaver, A/Professor Katharina Wolf, A/Professor Becky Freeman, Dr Kahlia McCausland, Dr Kevin Chai, Professor Stella Bialous, Dr Marilyn Bromberg, Ms Phoebe Adams, Ms Meghan Mcleod and Dr Renee Carey.



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CERIPH, Curtin School of
Population Health

GPO Box U1987
Perth Western Australia 6845

Telephone +61 8 9266 3807
Email j.jancey@curtin.edu.au
Web curtin.edu.au

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- 16 Tobacco Advertising Prohibition Act 1992 (Cth) s15A.