



Scottish Youth Parliament
Mansfield Traquair
15 Mansfield Place
Edinburgh
EH3 6BB
www.syp.org.uk

Environmental protection (Single-use Vapes) (Scotland) Regulations 2024

Scottish Youth Parliament response

Dear Net Zero, Energy and Transport Committee,

Please see below the Scottish Youth Parliament's (SYP) response to Edward Mountain MSP's letter on 28 June 2024 requesting views on The Environmental Protection (Single-use Vapes) (Scotland) Regulations 2024.

SYP has no direct or indirect links to the vaping or tobacco industry.

www.syp.org.uk

hello@syp.org.uk

[@OfficialSYP](https://twitter.com/OfficialSYP)

Registered in Scotland: SC227548

Scottish Charity Number: SC032662

Who We Are

Vision

SYP is the democratic voice of Scotland's young people. Our **vision** for Scotland is of a nation that actively listens to and values the meaningful participation of its young people. Our goal is to make this vision a reality, in order to ensure young people in Scotland grow up loved, safe and respected, and able to realise their full potential.

Mission

SYP's **mission** is to provide a national platform for young people to discuss the issues that are important to them, and campaign for changes to the nation that they live in. We support our members in their work by training them, supporting their personal development and empowering them, using a youth work ethos.

Members of the Scottish Youth Parliament (MSYPs) listen to and recognise the issues that are most important to young people in every community across the country and ensure that decision-makers listen to their voices.

Values

- **Democracy** - We are youth-led and accountable to young people aged 14 to 25. Our democratic structure and the scale of our engagement across Scotland gives us a mandate that sets us apart from other organisations.
- **Rights** - We are a rights-based organisation. We are passionate about making young people aware of their rights, and ensuring that local and national governments uphold their rights.
- **Inclusion and Diversity** - We are committed to being truly inclusive and work tirelessly to ensure policymakers and politicians hear the voices of young people from every community and background in Scotland.
- **Political Impartiality** - We are independent from all political parties. By working with all stakeholders, groups, and individuals who share our values, we deliver the policies that are most important to young people.

Our approach

As a youth-led organisation, we are constantly seeking the views of young people to ensure our policy positions represent their views as clearly as possible. This means that we have numerous opportunities to collect qualitative and quantitative data on a variety of issues underneath the umbrella of education. To ensure our response can accurately reflect the views of our members and the young people they represent, we pulled our information from various sources. These included:

Single Use, Many Voices report

Two MSYPs, Emma Prach and Marcus Flucker, in SYP's 2021-2023 Membership wrote and passed a Members' Motion at an SYP Sitting. In developing their Motion, Emma and Marcus conducted research piece with young people from across Scotland. The consultation was via survey in April 2023 and they received 686 responses from young people aged 12-25 in Scotland. The report can be viewed here [<https://syp.org.uk/wp-content/uploads/2023/09/Single-Use-Many-Voices-Report.pdf>]. In preparing this response SYP staff spoke to Marcus, who was re-elected as an MSYP in the 2023-25 Membership, to discuss the response.

SYP Policy passed as a Members' Motion

At SYP Sittings, the membership gets together and MSYPs have the opportunity to propose Member Motions that will become SYP policy statements. To submit a motion, they will have consulted with young people in their constituencies to demonstrate it is an issue important to young people. At the Sitting, the membership then votes on whether the motion should pass, again based on consultation of the proposed Motions with their constituents. By way of example, at the last SYP Sitting, SYP81 in July 2024, nearly 7000 young people were consulted before MSYPs voted on Members' Motions.

Our response

1. Do you agree that the supply and sale of single-use vapes in Scotland should be banned? If not, do you favour an alternative approach?

Yes, we agree. Following consultation with their constituents in 2023 84% of MSYPs voted to agree with the policy:

“The Scottish Youth Parliament recognises the environmental impacts of single-use disposable vapes and calls upon the Scottish Government to ban these devices; further calls upon the Scottish Government to take interim actions to mitigate these impacts while working towards a ban and to meaningfully engage with young people throughout this process.”

Additionally, 73% of young people consulted in the Single Use, Many Voices report thought a complete ban on single-use disposable vapes would be the most effective measure to regulate the sale / use of single use disposable vapes.

2. Coming into force on 1 April 2025, the regulations ban the supply of single-use vapes in Scotland. What do you think about the timescale for implementing this ban?

SYP have no reason to argue against the timescale given.

However, in preparing for the ban Scottish Government should urgently consider how they will communicate with users of single-use disposable vapes, many of whom are young people, about what the ban will mean for them. Young people should be involved in developing the communications to ensure they are effective at delivering key messages and accessible to young people.

Illustrating this, in the Single Use, Many Voices report one young person who responded to the survey is quoted saying *“Alongside the environmental impacts and needs for a full ban, awareness raising needs to be done in schools. However this cannot involve shaming or blaming young people... Ideally this awareness raising would be co-designed by young people.”*

3. A "single-use vape" - is any vape that is not refillable or rechargeable. Do you agree with this definition and are there any potential loopholes or unintended consequences?

We agree with this definition, it is simple and coherent for young people to understand which is an important element in communicating with young people in the lead up to implementing a ban.

If any amendments are made to the definition, they should be made with consideration of accessibility of the definition to young people in mind.

4. The regulations establish two main offences with associated penalties. Do you think these penalties are proportionate?

We do not have consultation evidence from young people on this question and so are not able to respond.

5. The enforcement powers granted to local authorities are extensive, allowing them to enter premises, take samples, and investigate suspected offences. What do you think of these powers both from the perspective of local authorities and businesses?

We do not have consultation evidence from young people on this question and so are not able to respond.

6. What do you think about the enforceability of the Regulations; potential key challenges in this area; and whether lessons can be drawn from any comparable areas, such as the single-use plastics ban.

Key to enforceability is awareness and understanding of the regulations and alternatives by users of vapes. See response to question 2 on the importance of communicating effectively with young people to ensure the ban is effective. As above, we would stress the need for awareness raising communications to be co-designed with young people to be effective.

7. The policy objectives aim to reduce environmental harm and encourage reusable alternatives. Are these regulations sufficient to meet these objectives and are any supportive measures needed, for example, around communication, or uptake of reusable alternatives.

On their own regulation is not sufficient. As specified above, communication aimed at users of single-use disposable vapes highlighting support, alternatives, and what the new regulations mean will be essential.

Existing communication around single-use disposable vapes has failed to effectively tackle the problem or minimise the environmental impact of them. For example, in the Single Use, Many Voices report 84% of young people who responded said they had not seen any information on where and how to recycle a single-use disposable vape.

In the same report, respondents were asked ‘where do you think are the best places to display information on how to correctly recycle single-use disposable vapes’ and 79% of respondents selected Social Media as one of the up to three options they could choose. This learning should be taken forward into communicating the regulations, alternatives, and support following a ban on single-use disposable vapes.

8. The Strategic Environmental Assessment says that the ban might result in an increased demand for illegally sold single-use vapes. What are the risks of increasing illegal sales of single-use vapes and how can those risks be mitigated?

We do not have consultation evidence from young people on this question and so are not able to respond.

9. Various impact assessments have been completed by the Scottish Government. The Committee would welcome views on the financial, business, environmental, and equality impacts identified or other comments on the impact assessments.

Human rights are one of the core values of the Scottish Youth Parliament, with Article 12 of the United Nations Convention on the Rights of the Child especially central to our work. As such, we welcome the Scottish Government’s recognition of young people’s views and the other rights impacts highlighted in the Children’s Rights & Wellbeing Impact Assessment.

10. The Regulations have been introduced following a UK consultation. Other UK countries are expected to introduce similar regulations. Do you have any views or concerns about alignment or cross-border implications?

We do not have consultation evidence from young people on this question and so are not able to respond.