



CTP Enforcement Challenges and Opportunities for Reform

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Enforcement Challenges

- No registration or inspection of foreign manufacturers (or listings of their products)
- Purported grandfathered “database” is not complete
- Sheer number of regulated deemed products
- 8/8/16 compliance policy
- No comprehensive database of vape shops in all jurisdictions
- Synthetic/non-tobacco-derived nicotine

Enforcement Challenges

- Effective Enforcement Techniques
 - Warning letter follow-up?
 - Border enforcement
 - Internet enforcement
 - Black market

Opportunities for Reform

- July 2017 Announcement
- Transparent and Proportional Regulation
- Nicotine Public Hearing and Steering Committee
- Product Standards