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Executive Summary

The retail environment is a key setting for substance use prevention, as tobacco and alcohol product availability, pricing, promotion, advertisements, and access contribute to the increased use of these products. There is evidence that a greater density of retailers that sell these products is associated with greater use of tobacco and alcohol by those living in proximity to these retailers. ^{1,2} Monitoring and understanding where these products are sold and what types of products are sold is valuable for informing priorities in substance use prevention programs and policies.

This is a report of the Vermont tobacco and alcohol retail audit for 2024. The goals of this audit were to understand and monitor the tobacco and alcohol retail environment in Vermont. We looked specifically at data about retailers that sell tobacco and alcohol products, and at specific product types and marketing.

Information was gathered about tobacco and alcohol retailers, including:

- Retailer type
- Retailer location
- Retailer density

Information was also collected about alcohol and tobacco products, including:

- Tobacco and alcohol product type
- Tobacco and alcohol product placement
- Product pricing (tobacco products)
- Advertising and promotion

Tobacco products are difficult to capture over time because of the changing retail environment that results from emerging products and restrictions on products. The development of the survey instrument was led by the Vermont Tobacco Control Program and the Vermont Department of Liquor and Lottery. Other partnering agencies, including the Vermont Attorney General's Office, the Department of Taxes and the Health Department Division of Substance Use reviewed and provided feedback on the retail audit tool in 2024. Questions about this report can be directed to Melissa Chapman Haynes, Ph.D. at Professional Data Analysts, TobaccoControl VT@pdastats.com.

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¹ Cantrell J., Pearson J.L., Anesetti-Rothermel A., Xiao H., Kirchner T.R., Vallone D. Tobacco Retail Outlet Density and Young Adult Tobacco Initiation. Nicotine Tob. Res. 2015;18:130–137. doi: 10.1093/ntr/ntv036.

² Johnson J.L., Canterberry M., Vu U.L., Carton T.W. Positive association between neighborhood retail alcohol outlet access and hospital admissions for alcohol withdrawal syndrome in New Orleans. J. Addict. Dis. 2020;38:311–316. doi: 10.1080/10550887.2020.1762029.

What's New in the 2024 Audit?

The primary goal of the 2024 audit was to allow for comparisons between the 2022 and 2024 audits. Additions or changes to the audit tool were made when an identified need or use for additional or more specific data was identified. Four types of additions were made to the 2024 audit.

First, e-cigarette tobacco product availability has increased since 2022, and so additional audit items were added on specific e-cigarette products and brands, particularly disposable e-cigarettes and prices of specific products. Pictures of tobacco displays were also taken during the audit; some of which are below.



Geek Bar disposable ecigarettes



Loon disposable ecigarettes



Loon, Geek Bar, and Elf Bar display, above candy

Second, items about nicotine pouches were added to the 2024 audit. Availability of specific brand types were coded, including: Zyn, Zyn Chill, On!, and Rogue. One item was also added to capture advertisements for nicotine pouches. Some pictures of nicotine pouch displays taken during the audit are below.



Zyn and On! display, next to chew



Variety of nicotine pouch brands, with a "buy 2 and save" promotion



Tobacco product display, with a bright Zyn display (left) and Rouge display (right)

Third, the cigar types were further defined in the 2024 audit, as compared to the 2022 audit. Medium cigars added in 2024, though there was sometimes confusion during data collection about distinguishing cigarillos/little cigars and medium cigars. In some cases, the analysis collapsed cigar categories (it is noted when this occurred).

Fourth, more alcohol product types were added to the 2024 audit, including ready-to-drink items and historically non-alcoholic beverages (e.g., "hard" Sunny-D). In addition, hard soda, hard tea, and hard lemonade were added in 2024. Finally, two self-checkout questions were added to the 2024 audit.

When possible, comparisons with the 2022 retail audit are highlighted in this report. The 2024 retail audit was conducted in fall 2024 and was a census of all retailers in the state that were able to be audited. Detailed methods are available in Appendix A. A historical list of retail audit items in 2022 and 2024 is provided in Appendix B. The 2014 and 2018 retail audits were conducted by CounterTools and local coalitions. Due to the variation in administration, along with changes in items asked, no direct comparisons are made in this report to the 2014 or the 2018 retail data. Retail audit reports from 2014 and 2018 can be provided upon request.

Key Findings

After decades of progress to reduce tobacco use among youth, current use of tobacco or nicotine use among high school students is at unacceptably high level. Nearly one in three Vermont high school students reported ever using an e-cigarette in 2023, the same percentage as in 2015.³ In 2023, female and those identifying as lesbian, gay, bisexual, transgender, queer, and more high schoolers, and those with an Individualized Education Plan, or IEP, were statistically more likely to have tried vaping. The percentage of high schoolers who used any tobacco or nicotine product in the past 30 days was 18%, with statistically higher use among the following groups: females (19%); those identifying as LGBTQ+ (20%); Black, Indigenous, People of Color (21%); and those with an IEP (22%).

This level of tobacco use can be at least somewhat attributed to the ubiquity of flavored tobacco products, including vaping products, which are designed by the tobacco industry to attract and retain customers. Youth, people of color, women, LGBTQ+ people, and people with low socio-economic status disproportionately use flavored tobacco products due to the targeted marketing tactics used by the tobacco industry to bring about nicotine dependence.^{4,5} The Food and Drug Administration has greatly narrowed down which

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³ Vermont Youth Risk Factors Surveillance Survey (YRBS). (2023). Statewide Report, https://www.healthvermont.gov/sites/default/files/document/hsi-yrbs-2023-statewide-report%20.pdf.

⁴ Lewis, M. J., & Wackowski, O. (2006). Dealing with an innovative industry: a look at flavored cigarettes promoted by mainstream brands. *American journal of public health*, 96(2), 244-251.

⁵ Anderson, S. J. (2011). Marketing of menthol cigarettes and consumer perceptions: a review of tobacco industry documents. *Tobacco control*, *20*(Suppl 2), ii20-ii28.

products are "authorized to sell," by authorizing only 27 vape products, mostly unflavored. However, Vermont and other states are grappling with a multitude of flavored products on retail shelves due to lack of federal enforcement. Most states do not have state authority to remove these products, including Vermont.

There were four key takeaways from the 2024 retail audit, including some changes in the Vermont tobacco and alcohol retail environment since 2022.

1 There were a wide variety of tobacco and alcohol product types available in 2024.

A 2024 retail audit priority reflected in the item types was to capture a wider variety of tobacco and alcohol product types. For tobacco products, items on nicotine pouches and ecigarettes were added, in addition to items on cigarettes, cigars, smokeless tobacco, and hookah. The audit also included additional information on specific brands and prices. Out of 711 tobacco retailers, 497 sold nicotine pouches (70%). The vast majority (84%) of tobacco retailers with nicotine pouches sold the brand Zyn. Among retailers that sold tobacco during the time of the 2024 audit, nearly all sold flavored tobacco products (687 out of 711, 97%).

In addition to nicotine pouches, items about disposable e-cigarettes availability were added to the 2024 audit. The most common brands of e-cigarettes were Loon, Loon Maxx, Elf, and Vuse. The prices for these products averaged just over \$20, with slight variation by brand.

Finally, additional types of alcohol products were added to the 2024 audit, including ready-to-drink beverages and historically non-alcoholic beverages (e.g., "hard" Sunny-D). Among retailers in the 2024 audit that sold alcohol, 75% (n=686 of 913) sold ready-to-drink beverages. The most common retailer types to sell these beverages included convenience stores, grocery stores, pharmacies, and beer/wine/liquor stores.

It is highly recommended that the next audit continues to monitor these emerging products.

2 Availability and density of tobacco and alcohol products varied throughout the state.

There was geographic variation by county in the density of tobacco and alcohol retailers in the state of Vermont. The statewide average was 1.4 tobacco retailers per 1,000 adults age 18+ (range = 0.85 – 2.0). The statewide average for alcohol retail density was slightly higher, with a statewide average of 1.9 retailers per 1,000 adults (range = 1.2 – 2.4). Orleans and Lamoille Counties had the highest density of tobacco retailers per 1,000 adults (age 18+); this is also true for alcohol density. In the most southern counties in Vermont, both Bennington and Windham had high tobacco and alcohol retailer density per capita. Higher tobacco retailer density per 1,000 adults at the census tract level was significantly associated with higher levels of both overall social vulnerability and socioeconomic vulnerability, meaning in areas with lower socioeconomic status populations, there was a higher density of tobacco retailers.

Research suggests that alcohol and tobacco retail density influences use of these products. For example, Orleans County had a high prevalence of cigarette smoking among adults and a high tobacco retail density per capita compared to other counties in Vermont. Orleans and Lamoille Counties had the highest density of alcohol retailers per 1,000 adults and have higher prevalence of heavy drinking.

3 Approximately one-fifth of tobacco retailers were near schools in Vermont.

In Vermont, **20% of tobacco retail locations were within 1,000 feet of schools** in 2024. This varied by county, with 0% of tobacco retailers in Grand Isle County compared to almost 40% of retailers in Orange County.

Tobacco retailers within 1,000 feet of schools were significantly more likely to have exterior tobacco advertisements than retailers not near schools (17% vs. 10%). Tobacco retailers near schools were also more likely to have price promotions than retailers not near schools (43% vs. 31%). There were no differences between retailers close to schools and those not close to schools in availability of flavored products, availability of e-cigarettes or nicotine pouches, tobacco products placed by youth products or advertisements near the floor.

There were concerning findings about product placement and advertising in 2024. In 2024, 743 out of 913 alcohol retailers (82%) had alcohol merchandized within three feet of the floor, which is at eye level for many youths. Further, among stores that sold alcohol, 15% merchandized alcohol products within 12 inches of youth products, which was an increase from 12% in 2022.

The most common types of tobacco ads were on the outside of the store (findings were true in 2022 and 2024). With the addition of pictures taken during the 2024 audit, there were a number of concerning photographs of potentially easy-to-access tobacco products (e.g., in an open aisle or on a shelf that was not behind a counter or glass). According to Vermont statute, "persons holding a tobacco license may only display or store tobacco products or substitutes: (A) behind a sales counter or in any other area of the establishment that is inaccessible to the public; or (B) in a locked container."

Finally, 90 of the 913 retailers that sold alcohol had a self-checkout, which is 10% of the those checked. Of the retailers with a self-checkout, 37 only sold alcohol; 53 sold both alcohol and tobacco. Out of 90 retailers that had a self-checkout, nearly all allowed a customer to buy alcohol or tobacco using the self-checkout (98%).

Introduction to Tobacco and Alcohol Retail in Vermont: Licensing, Education, and Compliance

Multiple Vermont agencies have been coordinating efforts for many years around tobacco control, as well as other substances. These agencies include:

- Vermont Tobacco Control Program
- Vermont Department of Liquor and Lottery
- Vermont Attorney General's Office
- Vermont Department of Taxes
- Vermont Agency of Education
- Health Department Division of Substance Abuse

Alcohol and tobacco products in Vermont are regulated by DLL. The agency is responsible for the training, licensing, compliance, and enforcement of alcohol and tobacco sales in the state.⁶ In 2023, a new online licensing, education, and enforcement portal was made available, providing retail owners and managers with real-time data and information about selling tobacco. It is a requirement that a director, partner, or manager attend an enforcement seminar at least once every two years to be informed about the Vermont laws related to purchase, storage, and sale of tobacco products. The FDA also has educational materials and guidance available on their website for retailers. DLL contracted with FDA to conduct compliance inspections annually until 2023.⁷

The Health Department, DLL, AGO, and AOE have collaborated on the content review of the Vermont tobacco and retail audit since 2014. In 2022, DLL started collecting the data used in the Vermont tobacco and retail audit, which includes training their investigators who collect the data. Professional Data Analysts is the contracted external evaluation partner of the Health Department Tobacco Control Program and was responsible for analyzing and reporting state-level retail audit data.

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⁶ Department of Liquor and Lottery, Division of Liquor Control, Licensing, https://liquorcontrol.vermont.gov/licensing.

⁷ FDA Compliance for Tobacco, https://liquorcontrol.vermont.gov/enforcement/tobacco.

License types and sampling for the retail audits

There are a variety of license types that establishments may have to sell tobacco and alcohol products in Vermont. Tobacco licenses and tobacco substitute endorsements need to be submitted to the municipality's local governing body for approval before submission to DLL.⁸ Establishments that apply for a liquor license of any kind in the state (1st class, 2nd class, 3rd class, etc.) can receive a tobacco license for no additional fee when submitting for a liquor license.

There were some methodological changes to the sample of store licenses between the retail audits conducted in 2022 and 2024, which led to the inclusion of more retailers in 2024 compared to 2022.

2022 sample: Tobacco-only licenses and tobacco substitute endorsements only (many of these sites also sold alcohol).

2024 sample: Tobacco and tobacco substitute licenses, as well as second-class alcohol licenses (with no tobacco license). A second-class license allows a store to sell beer and wine for off-premises consumption.

Full details on regulation, definitions, and guidance are available in <u>Title 7 – Alcoholic</u> <u>Beverages, Cannabis, and Tobacco Vermont Statute</u>.

For the 2024 retail audit, licenses that met the above criteria were pulled on September 3, 2024. DLL investigators attempted to audit all stores with a tobacco, tobacco substitute, and a second-class liquor license over two months. Retail audits were concluded on October 28, 2024.

The 2014 and 2018 retail audits were conducted by CounterTools and local coalitions. Due to the variation in administration, along with changes in items asked, no direct comparisons are made in this report to the 2014 or the 2018 retail data.

To read more about how data were collected and analyzed, readers may refer to the Methodology section at the end of this report.

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⁸ Tobacco Fee Changes Infographic, https://liquorcontrol.vermont.gov/sites/dlc/files/documents/Education/Tobacco%20Infographic.pdf

Access to Tobacco and Alcohol in Vermont

In this section, we summarize the number and types of stores that sell tobacco and alcohol products. The percentage of tobacco store types were stable between 2022 and 2024. In 2024 compared to 2022, more grocery stores sold alcohol, and fewer convenience stores with gas sold alcohol.

Both the 2022 and the 2024 Vermont tobacco and alcohol retail audit were a census of retailers with a tobacco license in the state. In 2024, second class liquor licenses were included in the sample of retailers. Some of the analyses in this report include only retailers across the 2022 and 2024 audits that sold tobacco. The sample size of retailers is reported throughout the report, since there is some variation across specific analyses.

For the 2024 retail audit, there was some interest in including less traditional retail establishments in the audit, such as flea markets and campgrounds. Given that these are more challenging to check, DLL prioritized **traditional retail tobacco establishments**. DLL

attempted to check the less traditional establishments, but if they were not accessible, the investigator noted this and moved to the next establishment. Given this, a new item was added to the 2024 audit to indicate whether the investigator was able to check the location. If a location could not be audited on the first attempt, a second attempt was not made. A full attrition table with sample sizes used in this report can be found in Appendix A.

Year	Number of retailers eligible for audit	Number of retailers audited with complete retailer information			
2014	727	n/a			
2018	1,038	n/a			
2022	779	766			
2024	1,048	961*			

^{*}Of this sample, 711 sold tobacco products.

Vermont retailer types

The DLL investigators received training about the following retailer types:

Convenience store with gas

Convenience store, also known as a food mart. Sells a limited line of goods that generally includes milk, bread, soda, and snacks, and also sells gas.

Convenience store without gas

Convenience store, also known as a food mart. Sells a limited line of goods that generally includes milk, bread, soda, and snacks, and does not sell gas.

Drug store or pharmacy

Known primarily for selling prescription drugs as well as over-the-counter medicines.

Beer, wine, or liquor store

Mostly sells beer, wine, or liquor and may sell a limited supply of snack foods.

Grocery store

Markets that have a selection of fresh fruits, vegetables, and raw meats intended to be cooked at home.

Mass merchandiser

Warehouse clubs or superstores primarily engaged in retailing a general line of groceries in combination with general lines of new merchandise, such as apparel, furniture, and appliances. Typically sell a wide range of goods.

Tobacco shop

Smoke shop or other retailer who primarily sells tobacco products (includes cigar shops, hookah bars).

Vape shop

Retailers that sell electronic cigarette vaporizers and paraphernalia (i.e., e-liquid, batteries, etc.).

Cannabidiol, or CBD, only shop

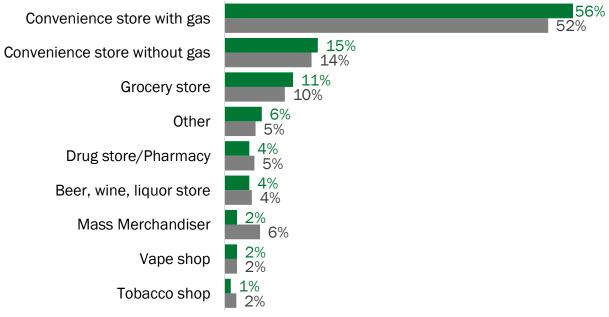
Only CBD and no other products are sold.

Other

Other store type that are not encompassed within the other categories. This includes bars, campgrounds, restaurants, dollar stores, and gift shops.

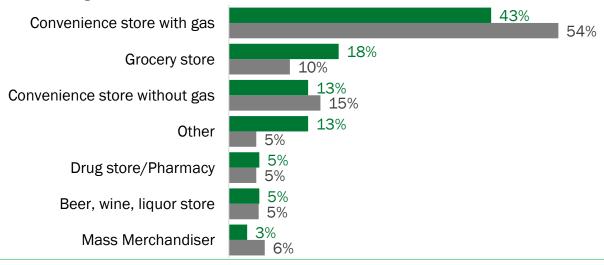
There were many more "other" retailers in 2024 as compared to 2022; most of these "other" retailers sold tobacco and very few sold alcohol. Very few tobacco and vape stores sold alcohol products; one vape shop sold alcohol in each audit. Three tobacco shops sold alcohol in both 2022 and 2024 (not shown in figure).

Among retailers that sold tobacco, the retailer types remained stable from 2022 to 2024.



2022 n=733; 2024 n=711

In **2024** compared to **2022**, more grocery stores sold alcohol, and fewer convenience stores with gas sold alcohol.



2022 n=702; 2024 n=913

Geographic distribution of tobacco retail locations

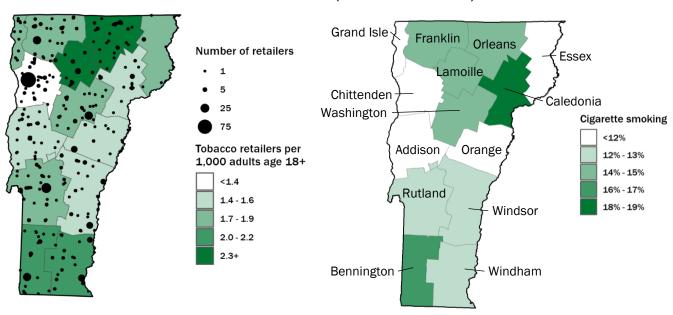
Location matters when it comes to tobacco retailers. When there are more tobacco retail locations in a given area, it affects the health of residents, as youth and young adults are more likely to start smoking, and it makes it harder to quit among those who smoke.^{9,10,11}

Density of tobacco retailers

The statewide average was 1.4 tobacco retailers per 1,000 adults age 18+ (range = 0.85 – 2.0). Orleans County, in the northern part of the state, and Lamoille County, in the northwest part of the state, had the highest density of tobacco retailers per 1,000 adults. In the most southern counties in Vermont, both Bennington and Windham had high tobacco retailer density per capita. The map below displays surveillance data from the Vermont Behavioral Risk Factor Surveillance Survey, or BRFSS. Tobacco use behavior can be influenced by tobacco retailer density.

County-level map of per capita **tobacco** retailer density and retailer location (2024)

County-level map of adult cigarette smoking (VT BRFSS 2022-23)



BRFSS = Behavioral Risk Factor Surveillance System

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⁹ Magid, H. S. A., Halpern-Felsher, B., Ling, P. M., Bradshaw, P. T., Mujahid, M. S., & Henriksen, L. (2020). Tobacco retail density and initiation of alternative tobacco product use among teens. *Journal of Adolescent Health*, 66(4), 423-430.

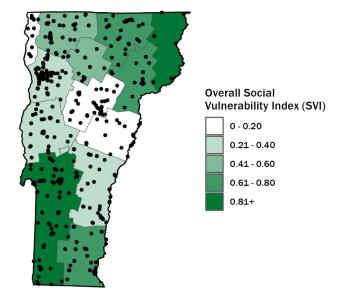
¹⁰ Cantrell, J., Pearson, J. L., Anesetti-Rothermel, A., Xiao, H., Kirchner, T. R., & Vallone, D. (2015). Tobacco retail outlet density and young adult tobacco initiation. Nicotine & Tobacco Research, 18(2), 130-137.

¹¹ Chaiton, M. O., Mecredy, G., & Cohen, J. (2018). Tobacco retail availability and risk of relapse among smokers who make a quit attempt: a population-based cohort study. *Tobacco control*, *27*(2), 163-169.

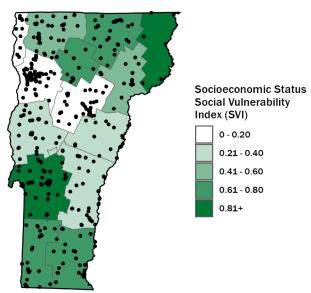
The two maps below display the geographic location of each retailer that sold tobacco during the 2024 audit, overlaid on county-level social vulnerability (SVI, 2022), which refers to the resilience of communities when confronted by external stresses on human health. ¹² Darker colors indicate a higher level of social vulnerability. The first map shows social vulnerability and includes measures on socioeconomic status as well as measures on household characteristics, housing and transportation, and racial composition. The second map only includes socioeconomic measures, like poverty and unemployment.

In bivariate tests (Pearson's correlation tests), in **areas with lower socioeconomic status** populations, there was a significantly higher density of tobacco retailers.

County-level social vulnerability and tobacco retailer location



County-level socioeconomic vulnerability and tobacco retailer location



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¹² https://www.atsdr.cdc.gov/place-health/php/svi/index.html

Tobacco retailer proximity to schools

The location of tobacco retailers does not only matter in broader communities; it also affects youth susceptibility to smoking when they are near schools. ¹³ The locations of all tobacco retailers with complete geographic information from the 2024 audit in Vermont were geocoded (n=711) and 500-foot and 1,000-foot buffers were drawn to indicate close proximity. The 1,000-foot distance between schools and tobacco retailers is considered to be a potential strategy to reduce tobacco retailer density in locations where youth are particularly susceptible to tobacco exposure. ¹⁴ The 500 foot distance between tobacco retailers and schools is also reported here to be consistent with Vermont's buffer policy for sales of certain substances, which prohibits cannabis sales within 500 feet of a school. ¹⁵

Tobacco retail locations were overlaid with the locations of all public¹⁶ and private¹⁷ schools in Vermont to understand how many tobacco retailers are in close proximity to schools.

In Vermont, 6% of tobacco retailers were located within 500 feet of schools and 21% of were within 1,000 feet of schools in 2024. This varied widely by county, as shown in the table below.

County (total number of tobacco retailers)	Percent tobacco retailers within 500 feet of schools	Percent tobacco retailers within 1,000 feet of schools
Orange (n=33)	24.2%	42.4%
Windham (n=54)	13.0%	16.7%
Essex (n=9)	11.1%	33.3%
Bennington (n=49)	8.2%	24.5%
Chittenden (n=129)	7.8%	16.3%
Addison (n=43)	5.8%	39.5%
Windsor (n=63)	4.8%	28.6%
Washington (n=62)	4.8%	9.7%
Orleans (n=46)	4.4%	21.7%
Rutland (n=89)	3.4%	20.2%
Caledonia (n=30)	3.3%	36.7%
Franklin (n=64)	1.6%	14.1%
Lamoille (n=29)	0.0%	6.9%
Grand Isle (n=11)	0.0%	0.0%

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¹³ Travis, N., Levy, D. T., McDaniel, P. A., & Henriksen, L. (2022). Tobacco retail availability and cigarette and e-cigarette use among youth and adults: a scoping review. *Tobacco control*, *31*(e2), e175-e188.

¹⁴ Myers, A. E., Hall, M. G., Isgett, L. F., & Ribisl, K. M. (2015). A comparison of three policy approaches for tobacco retailer reduction. *Preventive medicine*, *74*, 67-73.

¹⁵ https://ccb.vermont.gov/sites/ccb/files/2022-04/Buffer.Zone_.Guidance_FINAL.pdf

¹⁶ https://education.vermont.gov/data-and-reporting/vermont-education-dashboard/organizations

¹⁷ https://education.vermont.gov/documents/independent-schools-directory

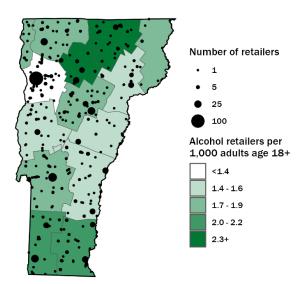
Additionally, bivariate analyses (Pearson's Chi-squared test or Fisher's exact test for small cell sizes) were conducted to assess whether characteristics of tobacco retailers were more common among those located within 1,000 feet of schools. Tobacco retailers near schools were more likely to have exterior tobacco advertisements than retailers not near schools (21% vs. 14%). Tobacco retailers near schools were also more likely to have price promotions than retailers not near schools (43% vs. 31%). There were no differences between retailers near schools and those not near schools in availability of flavored products, availability of e-cigarettes or nicotine pouches, tobacco products placed by youth products or advertisements near the floor.

Geographic distribution of alcohol retail locations

Density of alcohol retailers

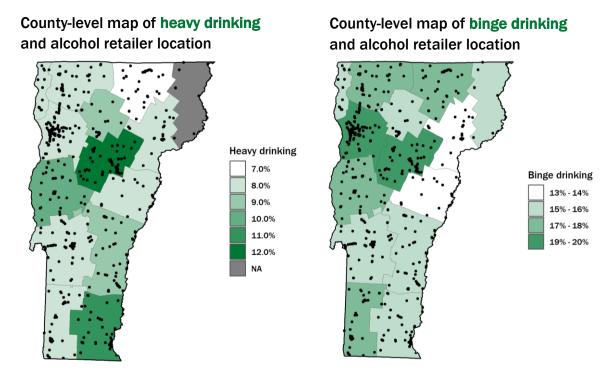
The statewide average for alcohol retail density was 1.9 retailers per 1,000 adults age 18+ (range = 1.2 - 2.4). Orleans and Lamoille Counties had the highest density of alcohol retailers per 1,000 adults. In the most southern counties in Vermont, both Bennington and Windham Counties had a relatively high number of alcohol retailers.





The two maps below display the geographic location of each retailer that sold alcohol during the 2024 audit, overlaid on adult alcohol use surveillance data from the 2023 Vermont Behavioral Risk Factor Surveillance Survey. Darker colors indicate a higher prevalence of adults who reported these behaviors:

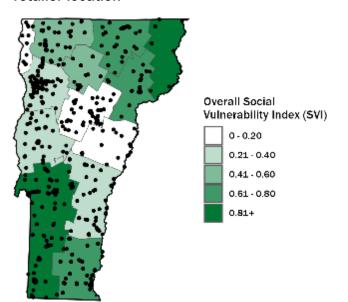
- BRFSS definition for **heavy drinking**: adult men having more than 14 drinks per week and adult women having more than 7 drinks per week.
- BRFSS definition for binge drinking: males having five or more drinks on one occasion, females having four or more drinks on one occasion.



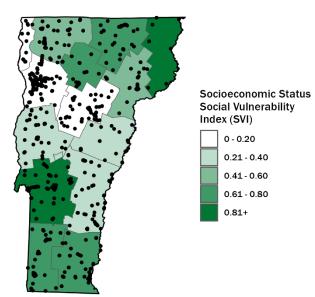
NA = Not applicable – the number of individuals is too small to accurately report county-level data VT BRFSS 2022-23 = Behavioral Risk Factor Surveillance System

The two maps below display the geographic location of each retailer that sold alcohol during the 2024 audit, overlaid on county level Social Vulnerability Index (SVI, 2022), which refers to the resilience of communities when confronted by external stresses on human health. Darker colors indicate a higher level of social vulnerability.





County-level socioeconomic vulnerability and alcohol retailer location



Overview of Available Tobacco and Alcohol Products

Tobacco and alcohol product types are detailed in this section. The availability of nicotine pouches sharply increased among tobacco retailers; in 2022, 44% of stores had these products, increasing to 70% of stores in 2024. E-cigarette availability also increased from 46% of tobacco retailers selling these products in 2022 to 57% of tobacco retailers in 2024.

There are a variety of tobacco and alcohol product types. In this section, we first provide definitions for tobacco product types and an overview of their availability across retailers. Then, we take a closer look at each tobacco product type to detail the availability of subtypes of each, including flavored and non-flavored varieties. This section ends with a discussion of alcohol products, including their definitions and availability by type.

Definitions and overall availability of tobacco product types

Vermont statute <u>7 V.S.A. § 1001</u> provides the legal definitions of tobacco products: "cigarettes, little cigars, roll-your-own tobacco, snuff, cigars, new smokeless tobacco, and other tobacco products as defined in <u>32 V.S.A. § 7702</u>."

Cigarettes

Any roll of tobacco wrapped in paper or any substance not containing tobacco and any roll of tobacco wrapped in substance containing tobacco that, because of its appearance, the type of tobacco used in the filler, or its packaging and labeling, is likely to be offered to, or purchased by, consumers as a cigarette.

Cigars

Any roll of tobacco wrapped in leaf tobacco or in any substance containing tobacco, other than any roll of tobacco that is a cigarette.

Little cigars (Cigarillos)

Any rolls of tobacco wrapped in leaf tobacco or any substance containing tobacco, other than any roll of tobacco that is a cigarette, and as to which 1,000 units weigh not more than four and one-half pounds.

Chew

A type of smokeless tobacco made from cured tobacco leaves. It may be sweetened and flavored with licorice and other substances. It comes in the form of loose tobacco leaves. (National Cancer Institute) For this report, chew includes moist/dry snuff, dip, and snus.

Loose tobacco (Roll-your-own tobacco)

Roll-your-own tobacco is loose tobacco that a person places inside rolling paper and burns. It is a combustible tobacco product.

E-cigarettes are classified in Vermont as a "tobacco substitute" that is "designed to deliver nicotine or other substances into the body through inhalation of vapor" and that have not been approved by the U.S. Food and Drug Administration for tobacco cessation or other medical purposes.

E-cigarettes

Also known as vapes; battery-operated devices that heat a liquid and produce an aerosol; typically contain nicotine. (CDC Smoking and Tobacco Use)

Other tobacco products, such as nicotine pouches or hookah, fall under a separate definition: "any product manufactured from, derived from, or containing tobacco that is intended for human consumption by smoking, chewing, or in any other manner, including products sold as a tobacco substitute ... and including any liquids, whether nicotine based or not, or delivery devices sold separately for use with a tobacco substitute, but shall not include cigarettes, little cigars, roll-your-own tobacco, snuff, new smokeless tobacco as defined in this section, or cannabis products as defined in 7 V.S.A. § 831."

Nicotine pouches

Small microfiber pouches that contain a powder made of nicotine, flavorings, and other ingredients. (CDC, Nicotine Pouches)

Hookah

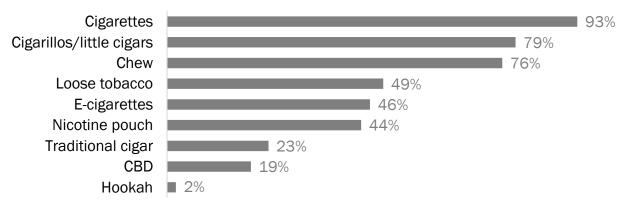
Water pipes that people use to smoke specially made tobacco. (CDC, Hookahs)

Cannabidiol, or CBD

A chemical that comes from the hemp plant, containing low levels of delta-9-THC. (<u>National Cancer Institute</u>)

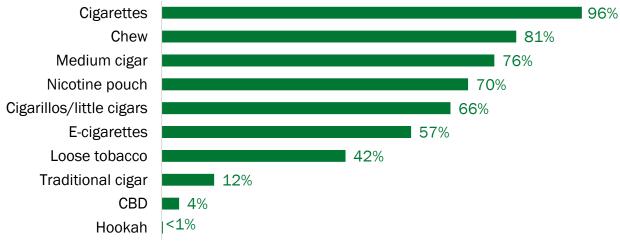
Not all retailers included in the retail audit sell tobacco, and not all tobacco retailers sell the same product types. The charts below demonstrate the availability of tobacco product types among all tobacco retailers in 2022 and 2024.

Among stores that sold tobacco in 2022, most sold cigarettes and cigarillos/little cigars.



2022 n=733; CBD=Cannabidiol; Medium cigars were included as cigarillos/little blunts in 2022, see Appendix A for further detail.

Among stores that sold tobacco in 2024, most sold cigarettes, chew, and medium cigars. Pouches were available at 70% of retailers in 2024.



2024 n=705; CBD=Cannabidiol

There were some notable differences in the types of stores where specific tobacco product types were sold in 2024. There were no meaningful differences between the 2022 and 2024 audits in where certain traditional tobacco products were sold.

The heat maps below display how often different store types sell specific tobacco products in 2022 and 2024. Percentages denote the proportion of tobacco retailers within each store type that sell the corresponding tobacco product. For example, in 2022, 100% of convenience stores with gas that sold tobacco sold cigarettes.

Among tobacco retailers in 2022, cigarettes, cigars, and chew were most commonly sold across store types. CBD was commonly sold at vape and tobacco shops.

	Total			Loose		E-	Nicotine	
	stores	Cigarettes	Chew	tobacco	Cigars	cigarettes	pouches	CBD
CS: Gas	383	100%	95%	53%	96%	71%	64%	19%
CS: No gas	106	100%	77%	55%	81%	24%	25%	10%
Grocery store	69	99%	41%	23%	36%	6%	4%	13%
Other	37	46%	19%	19%	41%	5%	3%	24%
Pharmacy	35	100%	86%	63%	94%	0%	66%	3%
Liquor store	32	84%	66%	63%	100%	56%	38%	25%
Mass merchandiser	42	95%	57%	48%	88%	0%	38%	0%
Vape shop	15	7%	0%	47%	33%	67%	0%	87%
Tobacco shop	14	50%	14%	57%	64%	50%	7%	79%

2022 n=733; CS = Convenience store; CBD = Cannabinoid; Note: cigar category is a collapsed category of traditional cigars, medium cigars, and cigarillos.

A darker blue cell indicates a higher percentage of tobacco retailers of the corresponding store type (row) sold the tobacco product type (column).

Among tobacco retailers in 2024, cigarettes and cigars were most commonly sold across store types. E-cigarettes and nicotine pouches were sold at high percentages at convenience stores with gas.

	Total stores	Cigarettes	Chew	Loose tobacco	Cigars	E- cigarettes	Nicotine pouches	CBD
CS: Gas	397	100%	95%	44%	97%	82%	90%	2%
CS: No gas	104	100%	84%	52%	88%	39%	58%	2%
Grocery store	78	97%	45%	24%	49%	6%	31%	3%
Other	44	73%	50%	30%	73%	20%	41%	7%
Pharmacy	30	97%	77%	33%	83%	0%	33%	0%
Liquor store	25	92%	72%	60%	100%	60%	56%	0%
Mass merchandiser	14	100%	57%	43%	100%	0%	50%	0%
Vape shop	14	29%	21%	21%	29%	64%	36%	64%
Tobacco shop	5	60%	0%	60%	80%	60%	60%	60%

2024 n=711; CS = Convenience store; CBD = Cannabinoid; Note: cigar category is a collapsed category of traditional cigars, medium cigars, and cigarillos.

A darker blue cell indicates a higher percentage of tobacco retailers of the corresponding store type (row) sold the tobacco product type (column).

Varieties of tobacco product types and their availability

Why do varieties of tobacco product types—like flavors—matter?

There are a variety of products that exist within the types of tobacco products we described in the previous section. Some important varieties include flavored and emerging products, which will be a key focus as we look closer at each type of tobacco product within this section of the report.

The CDC recognizes the comprehensive restriction of flavored tobacco products as an effective policy intervention and a public health approach to address tobacco-associated health disparities. Flavored tobacco products are easier to start and more difficult to quit, leading to the progression of prolonged tobacco use as compared to non-flavored products. Flavors appeal to youth and young adults, particularly flavors that mirror candy and other sweet flavors.

Flavored products are highly popular in Vermont, and in 2022 and 2023, flavored tobacco and nicotine products, including menthol flavor, made up one-third of all units sold in retailers (Nielsen sales data). ¹⁹ Additionally, the sales of modern oral nicotine products have tripled in Vermont since 2022 (e.g., pouches like Zyn, On!, and Velo), and sales of these products are primarily flavored.

The current smoking prevalence among Vermont youth (5.8%) is higher than other Northeastern states (CT = 3.0%, ME = 5.6%, MA, 3.4%, NH = 3.9%, RI = 3.1%).²⁰ Moreover, available vaping products are mostly flavored, and use of these products is high at 18% among high school students.²¹ It is well-established that the tobacco industry uses characterizing flavors to recruit and retain youth, minorities, and women who are aggressively marketed to and disproportionately impacted by flavored tobacco product use, making this a health equity issue.^{22,23}

Flavored products fall under the Vermont Tobacco Products Tax, which is a 92% excise tax that is paid by the wholesale dealers and added to the final retail price.²⁴ Among retailers that sold tobacco during the time of the 2024 audit, **nearly all sold flavored tobacco**

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¹⁸ Why flavored tobacco is an important issue, https://truthinitiative.org/our-top-issues/flavored-tobacco.

¹⁹ https://www.healthvermont.gov/sites/default/files/document/hpdp-tcp-vt-tobacco-sales-brief.pdf

 $^{^{20}}$ Centers for Disease Control and Prevention. 2023 YRBS Explorer $\underline{\text{https://yrbs-explorer.services.cdc.gov/\#/graphs?questionCode=H33&topicCode=C02&location=XX\&year=2023}$

²¹ 2023 Vermont YRBS https://www.healthvermont.gov/sites/default/files/document/hsi-yrbs-2023-statewide-report%20.pdf

²² Kostygina, G., & Ling, P. M. (2016). Tobacco industry use of flavourings to promote smokeless tobacco products. *Tobacco Control, 25*(Suppl 2), ii40-ii49.

²³ Carpenter, C. M., Wayne, G. F., Pauly, J. L., Koh, H. K., & Connolly, G. N. (2005). New cigarette brands with flavors that appeal to youth: tobacco marketing strategies. *Health Affairs*, 24(6), 1601-1610.

²⁴ Vermont Department of Taxes, https://tax.vermont.gov/business/miscellaneous-taxes/e-cigarettes/fags.

products (687 out of 711, 97%). Nearly all retailers sold mint flavored tobacco products (96%) and just slightly fewer sold flavors other than mint (84%).

Up to five ambiguous flavors were documented during the 2024 audit; the following word cloud displays these flavors. Larger words indicate a higher frequency. For example, the flavor "jazz" was documented 151 times, "blue" 103 times, "Green" 69 times, and "smooth" 56 times.

We discuss each tobacco product type and their varieties, including flavors, in the following sections.

Cigarettes (including menthol)

The number of retail locations that sold cigarettes slightly increased between 2022 and 2024. In 2022, 684 tobacco retailers (93%) sold cigarettes. In 2024, 681 tobacco retailers (96%) sold cigarettes. Among retail locations that sold cigarettes in 2022 (N=684) and 2024 (N=681), 99% of stores sold non-menthol cigarettes both years. It is important to examine menthol cigarettes specifically, given the tobacco industry's history of disproportionately marketing menthol cigarettes to marginalized groups, like Black and African-American communities and individuals who identify as LGBTQ+. Additionally, when first trying smoking, youth and young adults are more likely to try a menthol cigarette, instead of a non-menthol cigarette.²⁵

Menthol cigarettes are a type of cigarette that contain a chemical compound (menthol) that is found naturally in peppermint and other similar plants. (CDC Menthol Tobacco Products)

The number of retail locations that sold Newport menthol cigarettes did not change between 2022 and 2024. Among all cigarette retailers, 636 stores (93%) sold Newport menthol cigarettes in 2022, and 632 stores (93%) sold Newport menthol cigarettes in 2024. The number of retailers who sold cigarettes with menthol capsules in the filter also remained similar between 2022 and 2024. Among all cigarette retailers, 536 (79%) and 548 (81%) sold cigarettes with menthol capsules in the filter in 2022 and 2024, respectively.

Most retail locations sold menthol cigarettes, and this percentage of retailers has not changed over the past couple of years.

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²⁵ D'Silva J, Cohn AM, Johnson AL, Villanti AC. <u>Differences in subjective experiences to first use of menthol and nonmenthol cigarettes in a national sample of young adult cigarette smokers</u>. *Nicotine Tob Res.* 2018;20(9):1062–1068.

E-cigarettes

The **number of retailers that sold e-cigarettes increased** from 2022 to 2024. In 2022, 338 stores out of 733 tobacco retailers (46%) sold e-cigarettes. In 2024, 408 stores out of 711 tobacco retailers (57%) sold e-cigarettes.

Among retailers who sold e-cigarettes, in **2024**, more sold flavored mint and flavored non-mint e-cigarettes compared to **2022**.



2022 n=338; 2024 n=408

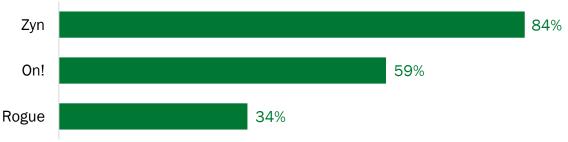
Some e-cigarettes are disposable, meaning the e-liquid cannot be refilled once it is depleted and the device must be discarded. Among retailers that sold e-cigarettes in 2024 (n=408), 74% sold disposable e-cigarettes. Other e-cigarettes are not disposable, which means the e-liquid can be refilled once it is depleted. To refill an e-cigarette, one must use an e-liquid dropper. Among retailers that sold e-cigarettes in 2024, 13% sold e-liquid droppers. This is similar to 2022, where 14% of e-cigarette retailers sold e-liquid droppers.



Nicotine pouches

The number of tobacco retailers that sold nicotine pouches increased from 2022 to 2024. In 2022, 326 out of 733 tobacco retailers sold nicotine pouches (44%), whereas in 2024, 497 out of 711 retailers sold nicotine pouches (70%). Only the 2024 retail audit included questions about brands and flavors of nicotine pouches, so the following chart only includes data from 2024.

Among tobacco retailers that sold nicotine pouches, Zyn was the most common brand sold in 2024.



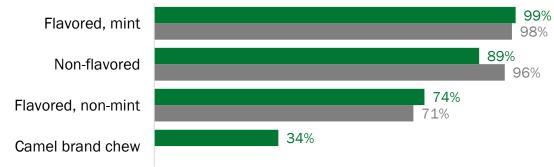
2024 n=497

Nicotine pouches are commonly flavored. Among all retailers who sold nicotine pouches in 2024 (n=497), 471 retailers (98%) sold mint-flavored pouches, and 449 retailers (93%) sold non-mint-flavored pouches.

Chew, moist or dry snuff, dip, or snus

For the retail audit in both 2022 and 2024, data were collected on chew, moist or dry snuff, dip, or snus (referred to as "chew" in this report). In 2022, among retail locations that sold tobacco (n=733), there were 558 retailers that sold chew. In 2024, 573 stores out of 711 tobacco retailers sold chew.

Among retailers that sold chew, mint flavored was the most commonly sold in 2022 and 2024.



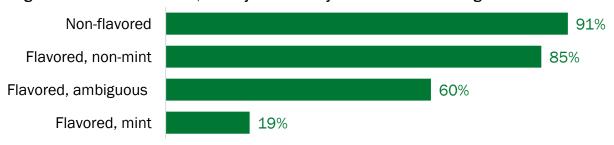
2022 n=558; 2024 n=573; Camel brand chew was not part of the 2022 retail audit.

Cigars (including cigarillos, medium cigars, and traditional cigars)

Among retail locations that sold tobacco in 2022 (n=733) and 2024 (n=711), 582 (79%) and 467 (66%) retailers sold cigarillos, respectively. Fewer retailers sold cigarillos/little cigars in 2024 compared to 2022.

In 2022, 509 out of 582 cigarillo retailers (88%) sold single packs. This number decreased in 2024, with 358 out of 467 retailers (77%) offering single cigarillos for purchase. Cigarillos in packs less than 20 were sold at 242 out of 467 retailers (53%) in 2024.

In **2024**, among retailers that sold cigarillos, non-flavored cigarillos were sold at the highest number of retailers, closely followed by flavored non-mint cigarillos.



2022 n=582; 2024 n=467

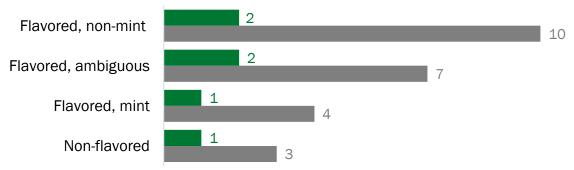
As a methodological note, medium cigars were not surveyed in the 2022 audit. Instead, these cigars were included in cigarillos/little cigars category, therefore no direct comparisons with 2022 data were made. Read more about the methodological distinction between types of cigars in Appendix A.

In 2024, among all tobacco retailers (n=711), 540 sold medium cigars (76%) and 82 sold traditional cigars (12%). In 2022, 169 out of 733 tobacco retailers sold traditional cigars (23%).

Hookah

In 2022, 13 out of 733 tobacco retailers (1.8%) sold hookah. In 2024, that number decreased to two out of 711 tobacco retailers (0.3%) selling hookah.

Among retailers that sold hookah, flavored, non-mint hookah was the most common type available in both 2022 and 2024.



2022 n=13; 2024 n=2; Data are presented in whole numbers rather than percentages due to small sample sizes.

Definitions and overall availability of alcohol product types

In the <u>Vermont Statute 7 V.S.A. § 2</u> alcohol is defined as "the product of distillation, fermentation, or chemical synthesis, including alcoholic beverages, ethyl alcohol, and non-potable alcohol." This includes malt beverages, wine, spirits, and ready-to-drink spirits. Three types of alcohol products are defined below.

Malt liquor

All fermented beverages of any name or description manufactured for sale from malt, wholly or in part, or from any malt substitute, known as, among other things, beer, ale, or lager, containing not less than one percent nor more than 16 percent alcohol by volume at 60 degrees Fahrenheit.

Ready-to-drink

An alcoholic beverage containing more than one percent alcohol by volume and not more than 12 percent alcohol by volume at 60 degrees Fahrenheit. Ready-to-drink may also contain water, fruit juices, fruit adjuncts, sugar, carbon dioxide, preservatives, and other ingredients. It should not include a beverage that is packaged in containers greater than 24 fluid ounces in volume.

Historically non-alcoholic

These are a particular sub-category of ready-to-drink beverages, in that an alcoholic version of a traditionally non-alcoholic drink is made available. Examples include "hard" Sunny D or "hard" Mountain Dew.

New items, including those about ready-to-drink beverages, were added to the 2024 Vermont retail audit. This was to inform a January 2025 DLL report to the House Committee on Government Operations and Military Affairs and on the Human Services and the Senate Committees on Economic Development, Housing, and General Affairs and the Health and Welfare regarding the results of the physical placement of beverage alcohol products within licensed retail establishments. There is specific interest in understanding availability and placement of beverages that have historically been non-alcoholic as well as the broader category of ready-to-drink spirts beverages.

In 2022, four types of alcohol products were part of the retail audit: beer, wine, malt liquor, and spirits.

Among alcohol retailers in 2022, most sold beer, wine and malt liquor.



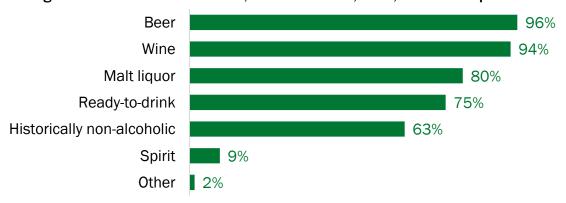
2022 n=702

Among retailers in the 2024 audit that sold alcohol (n=913), 75% sold ready-to-drink beverages). The prevalence of ready-to-drink beverages across store types were as follows:

- Convenience store with gas (73%)
- Beer/wine/liquor store (83%)
- Convenience store without gas (73%)
- Drug store or pharmacy (79%)
- Grocery stores (70%)

In 2024, more types of alcohol products were part of the retail audit, allowing a more nuanced understanding of product availability.

Among all alcohol retailers in 2024, most sold beer, wine, and malt liquor.



2024 n=913; Other category included products like liqueurs

The heat maps below display how often different store types sell specific alcohol products in 2022 and 2024. Percentages denote the proportion of alcohol retailers within each store type that sell the corresponding alcohol product. For example, in 2022, 99% of convenience stores with gas that sold alcohol sold beer.

Nearly all alcohol retailers in 2022 sold beer, malt liquor, and wine across store types.

	Total stores	Beer	Malt	Spirit	Wine
CS: Gas	379	99%	96%	4%	96%
CS: No gas	106	99%	93%	5%	96%
Grocery store	71	96%	94%	15%	97%
Mass					
merchandiser	43	95%	91%	0%	91%
Liquor store	34	97%	94%	85%	100%
Pharmacy	33	94%	91%	6%	94%
Other	32	94%	78%	53%	84%
Tobacco shop	3	100%	100%	0%	100%
Vape shop	1	100%	0%	0%	0%

2022 n=702; CS = convenience store

A darker blue cell indicates a higher percentage of alcohol retailers of the corresponding store type (row) sold the alcohol product type (column).

Among all alcohol retailers in 2024, beer, malt, and wine were commonly sold across store types. Historically non-alcoholic and ready-to-drink beverages were common at convenience stores with gas.

	Total		Hist. non-			Ready to		
	stores	Beer	alcoholic	Malt	Other	drink	Spirit	Wine
CS: Gas	396	99%	85%	97%	1%	89%	7%	94%
Grocery store	164	100%	59%	77%	2%	70%	7%	97%
CS: No gas	120	100%	49%	84%	1%	73%	8%	90%
Other	116	79%	18%	27%	3%	41%	3%	91%
Pharmacy	47	98%	51%	83%	0%	79%	0%	98%
Liquor store	42	95%	57%	67%	2%	83%	71%	93%
Mass merchandiser	24	100%	46%	71%	0%	50%	0%	96%
Tobacco shop	3	33%	33%	33%	0%	33%	0%	67%
Vape shop	1	100%	0%	100%	0%	100%	0%	100%

2024 n=913; CS = convenience store

A darker blue cell indicates a higher percentage of alcohol retailers of the corresponding store type (row) sold the alcohol product type (column).

Historically non-alcoholic beverages: Availability, product types, and merchandizing

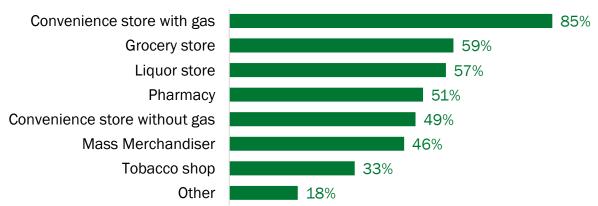
An emerging trend that is growing in popularity is the sale and consumption of teas, juices, coffees, and sodas that are blended with spirits like vodka, tequila, and rum. These specific types of ready-to-drink products have been growing in market share and were added to the 2024 retail audit.

Among stores that sell alcoholic versions of historically non-alcoholic beverages, 10 of the 571 (1.8%) merchandize these products with regular beverages. In other words, in these 10 stores, a customer may find a product such as Sunny D by an alcoholic version of Sunny D.



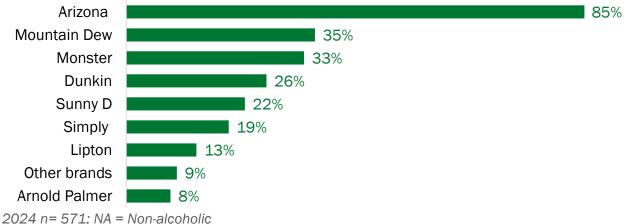
Picture of a historically NA product, vodka-infused Sunny D. Picture by Vermont DLL.

Among alcohol retailers in 2024, most that sold historically non-alcoholic products were convenience stores with gas, grocery stores, or liquor stores.



2024 n=571

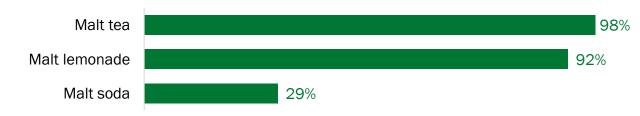
In 2024, Arizona branded beverages were available at retail locations at higher percentages than any other historically non-alcoholic beverages.



2024 H = 57 L, NA = NOH-alcoholic

Among the 728 stores that sold flavored malt beverages, there were three types sold.

The most common type of flavored malt beverages sold in 2024 was malt tea, closely followed by malt lemonade.



2024 n=728

Price of Tobacco Products

Some pricing data, such as the cheapest brands and prices of product types, are provided in this section.

Pricing of tobacco products is an important aspect of tobacco control because cheaper products make tobacco more accessible to vulnerable groups.²⁶ When tobacco prices increase, individuals using these products are more likely to reduce their tobacco use or quit. Additional pricing policies counteract the large tobacco industry budget (70-80%) that is spent on advertising price discounts for consumers.²⁷ Steep discounting is recognized as an industry tactic to attract and maintain tobacco use, especially among populations with low socioeconomic status.²⁸

A <u>three-pronged approach</u> is a national best practice to reduce tobacco use and has shown to be particularly impactful by helping low-income individuals to quit.

- The first prong Vermont has already completed—establishing a high excise tax. Vermont is ranked ninth in the top ten states in the U.S. for highest tobacco tax rate. However, discounting tactics like coupons and price promotions on tobacco products reduce the effectiveness of Vermont's tobacco excise tax rate.
- The other two prongs, prohibiting tobacco coupons and price promotions and establishing a minimum floor price, are vital to reduce tobacco use in adult and youth populations, to improve population health, and cut tobacco-associated cancer and chronic disease related costs. Vermont is the highest ranked nationally as recipients of tobacco coupons.²⁹

This section details the prevalence of price promotions for tobacco products and the minimum pricing of certain tobacco products in Vermont. In 2024, of the 711 retailers that were licensed to sell tobacco products, there were 239 retailers (34%) that had at least one price promotion during the time of the audit.

Price data are only presented for 2024 in this report and **do not include tax.** It is unclear whether price data collected in 2022 included tax or not, therefore those data are not included for comparison in this report. Outliers in price data were excluded, and full methods for exclusion can be found in Appendix A. In the Vermont retail audit, price promotions for tobacco products included special prices indicated by terms such as "special value," "discount," "cents off," "on sale," "reduced price," or "limited time offer," and multi-pack

²⁶ Bader, P., Boisclair, D., & Ferrence, R. (2011). Effects of tobacco taxation and pricing on smoking behavior in high risk populations: a knowledge synthesis. *International journal of environmental research and public health*, *8*(11), 4118-4139.

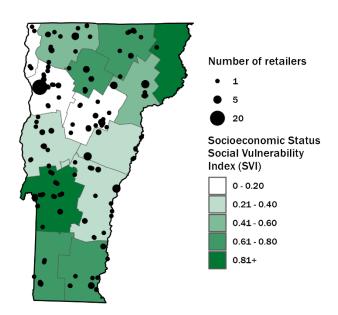
²⁷ Federal Trade Commission Cigarette Report for 2021 (Issued 2023).

²⁸ Chaloupka, F. J., Cummings, K. M., Morley, C. P., & Horan, J. K. (2002). Tax, price and cigarette smoking: evidence from the tobacco documents and implications for tobacco company marketing strategies. *Tobacco control*, *11*(suppl 1), i62-i72.

²⁹ Data from personal correspondence with Truth Initiative.

discounts, indicated by an offer to purchase more than one item that results in a lower price (e.g., buy-one-get-one free, get 5 free when you buy 3). The figure below shows the prevalence of retailers with price promotions and county-level socioeconomic vulnerability, though in statistical analyses (Pearson correlation tests), there was not a significant relationship between county and the number of tobacco retailers with price promotions.

Number of tobacco retailers with price promotions and county-level socioeconomic vulnerability (SVI 2022)



Non-menthol cigarettes

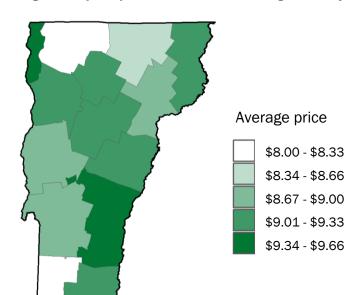
Between 2022 and 2024, the number of retail locations that had price promotions on non-menthol cigarettes did not change. In 2022, 178 (26%) retailers that sold cigarettes had price promotions on non-menthol cigarettes, and in 2024, 175 (26%) retailers that sold cigarettes had price promotions on non-menthol cigarettes. There was a wide range of the cheapest price of non-menthol cigarettes.

The cheapest price of non-menthol cigarettes in 2024 varied widely, with the average, cheapest price less than \$10.



n=642

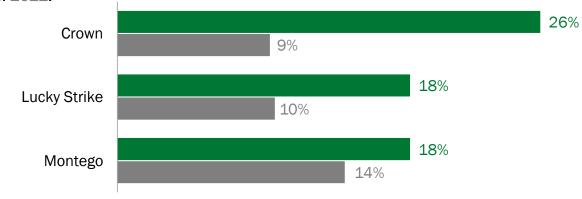
The average cheapest price of non-menthol cigarettes varied by county. Across the state, the average cheapest price of non-menthol cigarettes ranged from \$8.00 - \$9.50.



Average cheapest price of non-menthol cigarette by county

Investigators also collected data on which brand of non-menthol cigarettes was the cheapest at each retailer.

Among retailers that sold cigarettes, in **2024**, Crown, Lucky Strike, and Montego were the cheapest brands of non-menthol cigarettes sold. Montego was the cheapest brand in **2022**.



2022=684; 2024 n=681

Menthol cigarettes

Between 2022 and 2024, the number of retail locations that sold cigarettes and had price promotions on menthol cigarettes dropped. In 2022, 158 cigarette retailers (24%) had price promotions on menthol cigarettes, and in 2024, 117 cigarette retailers (18%) had price promotions on menthol cigarettes.

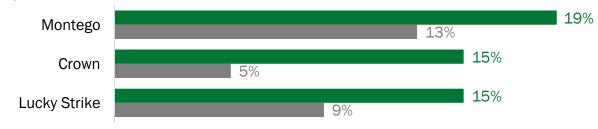
The cheapest price of menthol cigarettes in 2024 varied widely, with the average, cheapest price less than \$10.



n = 663

Investigators also collected data on which brand of menthol cigarettes was the cheapest at each retailer. The average price for a single pack of Newport menthol cigarettes was \$12.91.

Among retailers that sold cigarettes, in **2024**, Montego, Crown and Lucky Strike were the cheapest brands of menthol cigarettes sold. In **2022**, Montego was the cheapest brand.



2022=684; 2024 n=681

Nicotine pouches

During the 2024 retail audit, 497 retailers out of 711 tobacco retailers (70%) had nicotine pouches available for sale. Regarding price promotions, 66 retailers (14%) had mint flavored nicotine pouches on promotion and 62 retailers (13%) had non-mint flavored nicotine pouches on promotion.

The most common types of nicotine pouches sold included: Zyn, Zyn Chill, On!, Rogue. **Nearly all (84%) of the retailers that sold pouches offered Zyn** (416 of the 497) and over half sold On! (294 of the 497, 59%). There were 259 that sold Zyn Chill (52%) and 168 that sold Rogue (34%).

Usually, nicotine pouches were displayed in a brightly lit display; sometimes they were placed by a variety of other products.



Display of nicotine pouches.



Brightly lit sign for nicotine pouches.

Cigarillos, little cigars, or blunts

Among tobacco retailers in 2024, 467 out of 711 retailers sold cigarillos/little cigars (66%). Only six retailers had these products in a self-service display.



Display of various types of cigars.



Part of a display of various tobacco products, including single cigarillos and other cigars.

The cheapest price of any single cigarillo, little cigar, or blunt was documented in the 2024 audit, with nearly all of the 467 retailers that sold single cigarillos selling them for less than \$3.00; only four retailers sold these products for more than \$3.00.

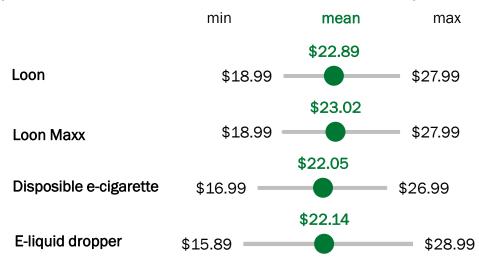
The cheapest price of any single cigarillo, little cigar, or blunt in 2024 was typically less than \$3.00.



n = 350

E-cigarettes

Price data on four, specific brands or types of e-cigarette products were only collected in 2024. Four products were part of the audit, and all had a similar average price, though price data were not collected for all retailers that sold these products.



Loon n=17, Loon Maxx n=19, disposable e-cigarette n=26, e-liquid dropper n=49

There were many examples of price promotions for various types of e-cigarettes, including JUUL.



Mobile coupons

Among retailers that sold tobacco, 18 out of 711 (2.6%) accepted mobile coupons in 2024 compared to 24 out of 733 tobacco retailers (3.3%) that accepted mobile coupons in 2022.

Advertisements and Marketing of Tobacco and Alcohol Products

In this section, results on advertisements and marketing of tobacco and alcohol products are reported.

Exterior advertisements remained the most common type of tobacco advertisements. Marketing for nicotine pouches was found at 35% of retailers; this was not asked in 2022.

Among alcohol retailers, the most common type of advertisements in 2024 were those for alcoholic beverages on cooler doors. Some retailers had advertisements inside the store (37%), and few had advertisements outside of the store (15%).

Training and guidance were provided to the DLL investigators who conducted the retail audit. Advertisements on both the interior and exterior of the retailers were part of the retail audit in 2022 and 2024.

As an example of the guidance, the following provides definition and scope for the external audit of advertisements, which includes perimeter structures such as fences, as well as walls, sidewalks, windows, and doors.

Are any tobacco products advertised anywhere outside the store? These are ads on windows/doors facing out, building, sidewalk, gas pumps, or elsewhere. This includes any sign, poster, banner, decal, sticker, neon light, or other three-dimensional object that promotes a brand. Areas to look for these advertisements include: parking lot and sidewalks, perimeter fences, windows and doors, exterior building walls, and gas pump.

Advertisements ARE:

- Intended to sell products
- Branded (name or logo)
- Displayed as a sign, poster, banner, or neon light
 - With or <u>without</u> price
- Printed, not hand-written
 - Can have hand-written price information

Advertisements ARE NOT:

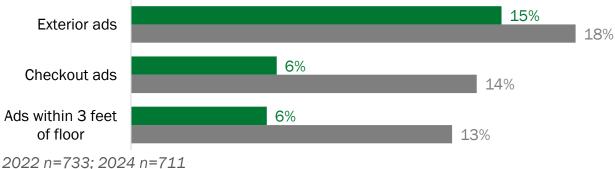
- Hand-written promotions
- Store name
- Unbranded references
- Product displays inside that are visible through the window

Excerpt from DLL training for investigators collecting data for 2024 retail audit, description of advertisements for tobacco products. Created by Melanie Gaiotti, DLL.

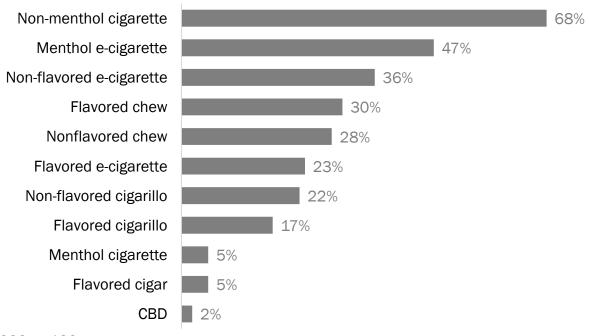
Tobacco product marketing

The percentage of retailers with each type of tobacco advertisements, as well as the type of tobacco products marketed, is detailed in the following figures. Also, not displayed, there were 25 retailers that had tobacco products within 12 inches of youth products in 2024. The majority of these retailers types were convenience stores with gas; three were each of the following: grocery stores, convenience stores without gas, and "other" stores.

In 2022 and 2024, the most common type of tobacco advertisements among retailers who sold tobacco were exterior advertisements.



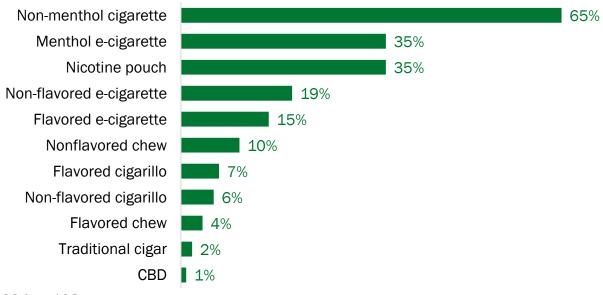
In 2022, among retailers that had exterior advertisements, most advertised nonmenthol cigarettes.



2022 n=130

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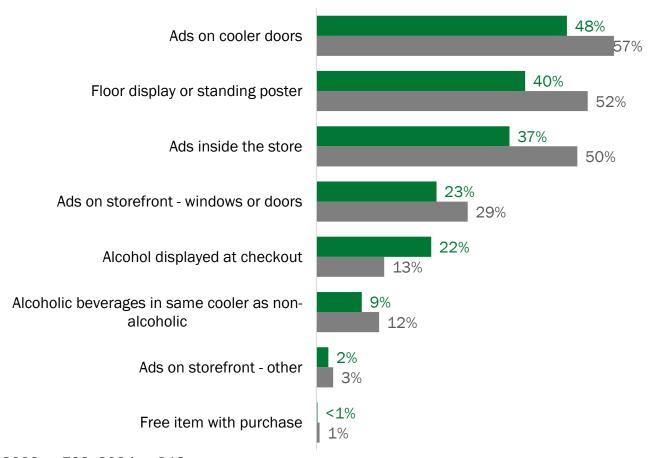
In **2024**, among retailers that had exterior advertisements, most advertised non-menthol cigarettes.



2024 n=108

Alcohol product marketing

Among retailers that sold alcohol, the most common types of marketing for alcohol products were product placement and advertisements inside the store in 2022 and 2024.

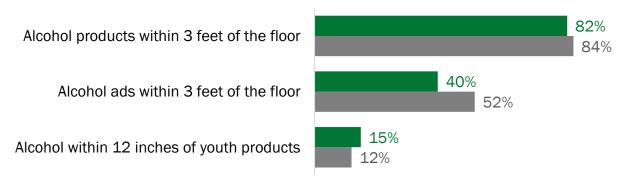


2022 n=702; 2024 n=913

"Ads on storefront – other" includes ads on any location apart from the windows and doors; examples include telephone poles, gas pumps, or walls.

Investigators also collected data on advertisements for alcohol that may appeal to youth, defined as being within 12 inches of youth products or having products or advertisements located within 3 feet of the floor.

In 2022 and 2024, alcohol retailers commonly merchandised products within 3 feet of the floor, which can be appealing to youth.



2022 n=702; 2024 n=913

Youth products included but were not limited to toys, candy, gum, slushy/soda machines, and ice cream. Placement of these items could have been on the counter, below the counter, behind the counter, or any other place in the retailers where tobacco was displayed. Granola bars were not considered candy. Mints were considered a youth product. Investigators were instructed to use their best judgment with this guidance in mind.

Self-checkout and curbside pickup (2024 only)

There were **90** of the **913** retailers that sold alcohol that had a self-checkout, which is 9.9% of the retailers checked. Among the 90 retailers with a self-checkout, 37 were only alcohol retailers, and 53 were both alcohol and tobacco retailers. Additionally, almost all retailers with a self-checkout (88 out of 90 retailers) allowed a customer to buy alcohol or tobacco products using the self-checkout.

There were 27 retailers (3%) that offer curbside pickup (of 913, with five missing data for this item). Vermont statute requires an ID check for sale of alcohol and tobacco products.³⁰

³⁰ https://legislature.vermont.gov/statutes/section/07/019/00589

Considerations for Future Retail Audits

While these data provide a clear snapshot of tobacco and alcohol retail locations in Vermont, there are several considerations for future audits to note based on the data collection and analysis processes.

- There was uncertainty around the price data for tobacco and alcohol products. It was
 difficult to parse out whether the lowest price recorded for a product included a price
 promotion or not. Future audits should include additional items for data collectors to
 note whether the lowest price included a price promotion or not.
- There were inconsistencies in when the cheapest price of specific brands of products (i.e., Loon and Loon Maxx) were collected within the 2024 retail audit. Future training for retail audits should include additional education and information around ecigarette brands and collecting price data.
- The classifications for cigar products in the 2024 retail audit was revised in an
 attempt to better capture variation the access and availability of the different kinds
 of cigars. However, feedback from data collectors indicated that the classifications
 (traditional, medium, and little cigars) were confusing. See methodological note in
 Appendix A for more information. Future audits should consider revising the cigar
 items on the audit tool to ensure clarity in the types of cigar products being sold in
 retailers.
- The 2022 and 2024 retail audits were a census of tobacco and alcohol retail locations in Vermont, resulting a large sample size. Future audits should consider adopting a sampling scheme for retail locations to reduce data collection burden, balanced with ensuring representativeness in the retail environments where tobacco and alcohol products are sold.
- The 2024 audit tool consisted of almost 110 items, so future audits should consider
 which questions are no longer relevant to ask, such as those no longer relevant due
 to a changing product landscape, to minimize audit burden. Another way to consider
 which items should remain is by considering how information is used, in the past and
 intended use moving forward.

Appendix A. Methodology

This report includes data from the retail audits conducted in 2022 and 2024. The retail audit in 2022 was the first audit conducted by DLL in partnership with the Health Department Tobacco Control and Prevention Program. Before the 2024 audit began, several partners involved in tobacco control, regulation, taxes, and research were invited to a discussion to determine the highest priorities for the 2024 retail audit. These partners included the Health Department Tobacco Control and Prevention Program and the Division of Substance Use, DLL, Professional Data Analysts, Department of Taxes, AGO, and Andrea Villanti, PhD (Rutgers University). Although many of the measures from the 2022 retail audit tool remained the same to ease comparison between years, some measures were added to capture high-priority information about emerging tobacco and alcohol products (see list of measures in Appendix B). Professional Data Analysts and DLL collaborated to revise the new measures before adding them to the 2024 retail audit tool.

Investigators at DLL collected all 2024 retail audit data. To promote consistency in data collection methods, DLL's lead investigator with previous retail audit experience trained investigators who would be collecting retail audit data in the field. During this training, the lead investigator completed a walkthrough of each survey section and shared important distinctions between retailer types, product types, product promotions, etc. PDA attended this training. Investigators were engaged in the training, and freely asked questions about the retail audit tool and made suggestions to improve it. Discussions between investigators at the training prompted PDA to add a few more items to the 2024 retail audit tool.

The 2024 retail audit began shortly after the retail audit tool was finalized. DLL investigators began collecting data the week of September 23, 2024 and finished data collection on October 28, 2024. The 2022 retail audit was conducted between March 9, 2022 and August 17, 2022.

The 2024 retail audit included all first- and second-class retailers as of September 1, 2024. Any retailer that obtained a new license past September 1, 2024 was not included in the 2024 retail audit. DLL sent raw data to PDA after data collection was complete; PDA cleaned and analyzed all data.

PDA cleaned 2024 retail audit data by completing several checks for data quality, including: investigating missing data, de-duplicating data, and correcting contradictory responses (e.g., alcohol retailer indicated as not selling alcohol) (see attrition table below). Most analyses for this report included frequencies and cross-tabulations, all of which were calculated using R. For geographic data, the locations of all tobacco retailers with complete geographic information from the 2024 audit in Vermont were geocoded (n=952) and used for mapping and spatial analyses.

Outliers in price data were removed from the analytic dataset using the interquartile range (IQR) and any observations that were more than 1.5 IQR below quartile 1 or more than 1.5 IQR above quartile 3 were considered outliers to provide robust estimates for price that were not sensitive to extreme prices or errors in data collection or data entry. Two observations were removed for the e-cigarette dropper variable and two observations were removed for the disposable e-cigarette variable.

Methodological note regarding cigar types

The method we used to collect data on tobacco types changed slightly from 2022 to 2024. To capture more information about cigars like Swisher Sweets, which are typically larger than cigarillos but smaller than traditional cigars, a new response option was added and termed "medium cigars." While this may have improved our ability to capture more information about the availability of cigars like Swisher Sweets, it limited our ability to compare tobacco types between 2022 and 2024. Because of this difference in methodology, 2022 and 2024 data regarding these cigar types are presented in separate figures throughout the report.

There was some reported confusion by investigators among the three cigar/cigarillo types that were distinguished in the 2024 audit. In the 2022 audit, "medium cigars," such as Swisher Sweets, were included in the cigarillos/little cigars category. For the 2024 audit, these were the working definitions of the three types of cigars:

- Traditional cigars: These are often sold as singles but can also be found in multi-pack boxes. Some cigarillos/little cigars have the word "cigar" on the package (e.g., "25 pipe-tobacco cigars"); however, these are not considered large cigars because they are sold in a pack, and they are smaller than large cigars.
- Medium cigars: These are cigars that are larger than little cigars but smaller than the large cigars. Cigars such as Swisher Sweets are in their own category for 2024 because they do not have a tax stamp (and little cigars do).
- Cigarillos/Little cigars: These may be sold individually, a few in a pack, or in a pack of 20 that looks like a cigarette pack. They are short (3.4 inches) or approximately the size of a cigarette. Title 32 defines little cigars as: any rolls of tobacco wrapped in leaf tobacco or any substance containing tobacco, other than any roll of tobacco that is a cigarette within the meaning of subdivision (1) of this section, and as to which 1,000 units weigh not more than 4.5 pounds.³¹

 $\frac{https://legislature.vermont.gov/statutes/section/32/205/07702\#:\sim:text=(6)\%20\%E2\%80\%9CLittle\%20cigars\%E2\%80\%9D,four\%20and\%20one\%2Dhalf\%20pounds.$

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³¹ Vermont General Assembly, Vermont Statutes Online,

Attrition table and missing data

The average percentage of variables missing per observation was 37.7% for the 2022 retail audit and 33.8% for the 2024 retail audit. The 2022 and 2024 retail audit instruments included skip logic for certain sections, which results in missing variables across the dataset when sections were skipped.

The table below provides information about the sample sizes of tobacco and alcohol retail locations included in this report.

	2022	2024
Total number of retailers eligible for audit	779	1,048
Unique retail audits attempted	766	1,048
Business closed at time of inspection, excluded	n/a: not asked in 2022	67
Location out of business, excluded	n/a: not asked in 2022	12
Other reason business could not be audited, excluded	n/a: not asked in 2022	8
Unique retail audits conducted	n/a: not asked in 2022	961
Retailers with complete retailer information including license number, retailer name, and contact information	766	961
Retailers with complete geographic information	n/a: not used in this report	952
Products sold		
Number of retailers that sold tobacco	733	711
Number of retailers that sold alcohol	702	913
Number of retailers that sold tobacco and NOT alcohol	53	38
Number of retailers that sold alcohol and NOT tobacco	22	241
Number of retailers that sold both alcohol and tobacco	680	672

Appendix B. Historical List of Vermont Retail Audit Items

Moscuro	2022	2024	Notes
Measure	2022	2024	Notes
Retailer details			
Store name	Х	Х	
Address	Х	Х	
Do the business name and address	Х	Х	
match our system?			
Please provide correct business	Х	Х	
name and address			
City	Х	Х	
License number	Х	Х	
Were you able to check this		Х	If the investigators said no, they
location?			were prompted to share why.
Do they sell tobacco products or	Х	Х	
paraphernalia?			
Do they sell alcohol?	Х	Х	
What types of alcohol do they sell?	Х	Х	Historically non-alcoholic beverages
			and Ready-to-Drink beverages were
			new response options in 2024.
Which of the following product		Х	Response options included hard
types do they sell?			soda, hard tea, and hard lemonade.
Choose the best store type.	Х	Х	
Is there a pharmacy counter	X	Х	
present?			
What types of tobacco products	X	Х	Medium cigars were added in
does the business sell?			2024.
Is there a self-checkout available?		Х	
Can someone purchase		Х	
alcohol/tobacco at the self-			
checkout?			
Ads (general)			
Are any alcoholic beverages	X	Х	
advertised on doors or windows			
from outside?			
Are any alcoholic beverages	X	X	
advertised outside the store other			
than on windows and doors? (e.g.,			
telephone poles, gas pumps, walls)			

Measure	2022	2024	Notes
Does the store have internally illuminated (i.e., lit up) signs advertising alcohol in windows or outside the store?	Х	Х	
Are any tobacco products advertised anywhere outside the store? (Ads on windows/doors facing out, building, sidewalk, gas pumps)	Х	Х	
What types of tobacco are advertised outside?	Х	Х	Hookah, flavored hookah, and nicotine pouches were added in 2024.
Are there any indications that mobile tobacco coupons are accepted?	Х	Х	
Are any tobacco products placed within 12 inches of youth products?	Х	Х	
Are any tobacco products advertised within 3 feet of the floor?	Х	Х	
Are there promotions for tobacco products or related paraphernalia for e-products in the checkout area?	X	X	
Cigarettes			
Are non-menthol cigarettes sold here?	Х	Х	
What is the cheapest brand of non- menthol cigarettes?	Х	Х	
What is the cheapest advertised price of a single pack of non-menthol cigarettes?	Х	Х	
Are menthol cigarettes sold here?	Х	Х	
What is the cheapest brand of menthol cigarettes?	Х	Х	
What is the cheapest advertised price of a single pack of menthol cigarettes?	Х	Х	

Measure	2022	2024	Notes
Are Newport Menthol cigarette	Х	Х	
single packs (regular hard pack)			
sold here?			
Enter the advertised price of	Х	Х	
Newport menthol cigarette single			
pack.			
Are any cigarettes with menthol	Χ	Χ	
capsules in the filter sold here (e.g.,			
Camel Crush or Marlboro NXT)?			
Are there any non-menthol cigarette	Х	Χ	
price promotions?			
Are there any menthol cigarette	Х	Х	
price promotions?			
Cigarillos/Little Cigars			
Are any little cigars sold in packs of		Х	
less than 20?			
Are any flavored cigarillos, little	Х	Х	
cigars or blunts sold (not including			
mint menthol wintergreen)?			
Are cigarillos, little cigars or blunts	Х	Х	
flavored with mint, menthol, or			
wintergreen sold?			
Are non-flavored cigarillos, little	Х	Χ	
cigars, or blunts sold here? Are there any non-flavored cigarillo,			
little cigars, or blunts price	Х	Х	
promotions? (advertised sales)			
Are there flavored mint, menthol or	X	X	
wintergreen cigarillo, little cigars, or	^	^	
blunts price promotions?			
(advertised sales)			
Are there any flavored other than	Х	Х	
mint menthol or wintergreen	^	^	
cigarillo, little cigars, or blunts price			
promotions? (advertised sales)			
Are any cigarillos, little cigars or	Х	Х	
blunts listed with ambiguous flavor			
descriptions (e.g., Black and Mild,			
Blue, Island Madness)			

Measure	2022	2024	Notes
What are the names of the	Х	Х	"Up to 5" was added in 2024.
ambiguous flavors (comma			
separated up to five)			
Are single cigarillos, little cigars or	Х	Х	
blunts sold here?			
Are any cigarillos, little cigars, or	Х	Х	
blunts in a self-service display?			
What is the cheapest price of any		Х	
single cigarillo, little cigar, or blunt?			
Cigars			
Are cigars flavored with mint,	Х	Х	
menthol, or wintergreen sold here?			
Are cigars with flavors other than	Х	Χ	
mint menthol or wintergreen sold			
here?			
Are non-flavored cigars sold here?	Х	Х	
Are traditional cigars in self-service	Χ	Χ	
displays?			
Chew/snuff/dip/snus			
Is Camel snus sold here?		Х	
Is chew/snuff/dip/snus flavored	Χ	Χ	
with mint/menthol/wintergreen			
sold here?			
Is chew/snuff/dip/snus with flavors	Х	Х	
other than			
mint/menthol/wintergreen sold			
here?			
Is non-flavored	Х	Х	
chew/snuff/dip/snus sold here?			
Are there any price promotions	Х	Х	
(ads) for chew/snuff/dip/snus			
flavored with			
mint/menthol/wintergreen?			
Are there any price promotions	Х	Х	
(ads) for chew/snuff/dip/snus			
flavored other than			
mint/menthol/wintergreen?			

Measure	2022	2024	Notes
Are there any price promotions	Х	Х	
(ads) for non-flavored			
chew/snuff/dip/snus?			
E-cigarette products			
Out of the e-cigarette brands listed		Х	Options in 2024 included Loon, Elf,
below, select those that are			Loon Maxx, and Vuse.
available for purchase.			
List up to five types of Loons sold		Χ	
(other than Loon Maxx).			
Which type of Loon is the cheapest		Χ	
(without tax)?			
What is the price of the cheapest		Χ	
Loon product (without tax)?			
What is the price of Loon Maxx		X	
(without tax)?			
Are disposable e-cigarettes		X	
available?			
What brand is the cheapest priced		Х	
(single use) e-cigarette product?			
What is the price of the cheapest		Х	
priced single use e-cigarette			
(without tax)?			
Are any e-cigarette products	Х	Х	
flavored with			
mint/menthol/wintergreen sold			
here?			
Are any e-cigarette products with	Х	Х	
flavored other than			
mint/menthol/wintergreen sold			
here?			
Are any non-flavored e-cigarette	Х	Х	
products sold here?			
Are there any promotions for e-	Х	Х	
cigarette products flavored with			
mint/menthol/wintergreen? Are there any promotions for a	v	v	
Are there any promotions for e-	Х	Х	
cigarette products flavored with flavors other than			
mint/menthol/wintergreen?			
miny mention wintergreems			

Measure	2022	2024	Notes	
Are there any promotions for non-	Х	Х		
flavored e-cigarette products?				
Are e-liquids in droppers sold here?	Х	Х		
What brand of e-liquid is the	Х	Х		
cheapest?				
What is the cheapest advertised	Χ	Χ		
price of a dropper of e-liquid?				
Hookah				
Are there any hookah products	Х	Х		
flavored with				
mint/menthol/wintergreen sold				
here?				
Are there any hookah products	Х	Х		
flavors other than				
mint/menthol/wintergreen sold				
here?				
Are there any non-flavored hookah	Х	Х		
sold here?				
Are there any hookah products with	Х	Х		
ambiguous flavor sold here (e.g.				
star buzz or blue mist)?				
Are there any price promotions for	Х	Х		
hookah flavored with				
mint/menthol/wintergreen?				
Are there any price promotions for	Х	Х		
hookah with flavors other than				
mint/menthol/wintergreen?				
Are there any price promotions for	Х	Х		
non-flavored hookah here?				
Are any hookah products in a self-	X	X		
service display?	•			
CBD				
Does the store have advertising for	Х	Х		
CBD that contains a cannabis leaf?	^	^		
Alcohol				
Are there any ads for alcoholic	Х	Х		
beverages inside of the store?	^	^		
neverages maine of the store:				

Measure	2022	2024	Notes
	_2022	-2021	1000
Are alcoholic beverages within the	Х	Х	
same cooler as non-alcoholic			
beverages?			
Are any alcohol ads located within 3	Χ	Χ	
feet of the floor?			
Are there any alcohol ads on cooler	Х	Х	
doors?			
Are floor displays or standing	Х	Х	
posters for alcohol present?			
Is alcohol displayed in the checkout	Х	Х	
area?			
Is alcohol displayed within 12	Х	Х	
inches of youth products (e.g. candy			
and toys)?			
Are there any promotions offering a	Х	Х	
free item with the purchase of			
alcohol?			
Are alcohol products located within	Х	Х	
3 feet of the floor?			
Are six-packs of Bud Light 12 oz	Х	Х	
cans sold here?			
What is the price for a six-pack of	Х	Х	
Bud Light 12 oz cans?			
Are six-packs of Bud Light 12 oz	Х	Х	
bottles sold here?			
What is the price for a six-pack of	Х	Х	
Bud Light 12 oz bottles?			
Do they sell supersized flavored	Х	Х	
malt beverages (23.5 oz or larger)?			
Are flavored malt beverages of any	Х	Х	
size within 12 inches of non-			
alcoholic beverages?			
Are single serving alcoholic	Х	Х	
beverages available in coolers?			
Are any historically non-alcohol		Х	
products merchandized with regular			
(non-alcohol) products? (e.g., Hard			
sunny D located next to Sunny D)			

Measure	2022	2024	Notes
Which historically non-alcoholic		Х	
products are available? (list up to			
five, comma seperated)			
Is there curbside pickup of alcohol	Χ	Χ	
available?			
Nicotine pouches			
Pick all of the nicotine pouches		Х	Answer options included Zyn, Zyn
below that are sold.			Chill, On!, and Rogue.
Are nicotine pouches flavored with		Х	
mint/menthol/wintergreen sold			
here?			
Are nicotine pouches with flavors		Х	
other than			
mint/menthol/wintergreen sold			
here?			
Are there any price promotions		Х	
(ads) for nicotine pouches flavored			
with mint/menthol/wintergreen?			
Are there any price promotions		Х	
(ads) for nicotine pouches flavored			
other than			
mint/menthol/wintergreen?			

