





This product contains
nicotine which is a highly
addictive substance

PRO MAX
4000+ PUFFS

FRESH MINT

MAYFAIR
Smoking
kills

Marlboro
Touch White
20 sigara

RICHMOND
Smoking
seriously
harms
you and others
around you

Smoking
causes
cancer

COOL
PREMIUM
BLUE
New Style

Buckinghamshire & Surrey
trading standards

V
Exhibit number

/20

Signed

Date 17/11/2025
Issue October 2016







Buckinghamshire & Surrey
trading standards

V
Exhibit number

122

Signed

Date 11/11/2025
Issue October 2015





Buckinghamshire & Surrey
trading standards

v
Exhibit number

Signed

/23

Date 17/11/2025
Issue October 2015





Email: General Enquiries@bucksandsurreytradingstandards.gov.uk
General Enquiries: 0300 123 2329
www.bucksandsurreytradingstandards.gov.uk

Mr Pawandeep Bajaj
Nappa Ltd
Singh Hub
157 High Street
STAINES
Surrey
TW18 4PA

TRADING STANDARDS

Walton Street Offices
Aylesbury
Buckinghamshire HP20 1UP

Woodhatch Place
11 Cockshot Hill, Reigate
Surrey RH2 8EF

23 May 2024

Dear Mr Bajaj

ADVICE LETTER

Tobacco and Related Products Regulations 2016 General Product Safety Regulations 2005 Classification, Labelling and Presentation of Substances and Mixtures Regulations

I am writing to you as the director of Nappa Ltd trading as Singh Hub, in relation to offences committed under the above legislation.

I have now reviewed the investigation report from Senior Trading Standards Officer, Catriona Macbeth, in relation to a seizure of products from your premises.

On 16th April 2024 an inspection was carried out at Singh Hub and checked the compliance of the disposable vapes (aka "puff bars") and the shisha with the above-mentioned legislation. The vapes are e-cigarettes (Nicotine Inhalating Devices) used for the consumption of nicotine-containing vapour.

266 x assorted vapes, all either above the maximum permitted tank size of 2ml; above the maximum permitted nicotine content and/or without required information and/or without the required CLP warnings were seized as evidence as these products breached Part 6 the



Chartered Trading
Standards Institute
corporate affiliate member



Buckinghamshire & Surrey trading standards

Tobacco and Related Products Regulations 2016; a person is guilty of an offence if that person breaches any part of Regulation 6 except for Regulation 32.5 and Regulation 34.

5 x packs of shisha were seized as evidence as these products breached the Tobacco and Related Products Regulations 2016, in that under Regulation 48 of the Tobacco and Related Products Regulations 2016; a person is guilty of an offence if that person breaches Regulation 28 (labelling and presentation of herbal products for smoking).

I understand that Ms Macbeth has provided you with a copy of some guidance about the legal requirements for supplying vapes.

As non-compliances were detected, the purpose of this letter is to explain the requirements of the legislation and to assist you in trading lawfully in the future.

This letter also sets out what will now happen with the products which were seized from your premises on the suspicion that they were in breach of the above Regulations.

1 – Legal requirements relating to the supply of e-cigarettes containing nicotine

Tobacco and Related Products Regulations 2016

Requirement for products to be notified to the MHRA prior to sale

You can only sell pre-filled disposable e-cigarettes or any other vaping liquid that contains nicotine which have been notified to the Medicines and Healthcare products Regulatory Authority (MHRA). When sourcing new supplies of any e-cigarette or e-liquid product, check that a compliant notification has been published in one of the Notified Product lists that can be found on the MHRA's website (<https://cms.mhra.gov.uk/>).

If you cannot find the product on the MHRA's website, ask your supplier to confirm that it has been published and provide details to enable you to confirm the product's status. If a product has yet to achieve publication status, they may not supply it to you. Any stock offered for sale without said MHRA publication status is liable to seizure.

None of the products seized have been notified to the MHRA as required.

The Maximum Capacity & Strength of E-Cigarettes

Nicotine containing liquid which is presented for sale in a disposable electronic cigarette must not be in a volume exceeding 2ml. *All of the vapes seized were above the 2ml limit.*

The maximum nicotine content of any type of e-cigarette be it a re-fillable or a disposable device is 2% (or 20mg/ml in liquid form). Devices with a nicotine content higher than 2% cannot be sold in the UK. Please be aware that many manufacturers, for example Geek Bar, produce different versions of the same brand/flavour for both the EU/UK market where



Chartered Trading
Standards Institute
corporate affiliate member



Buckinghamshire & Surrey trading standards

the limit is 2% and also for other markets (i.e. the USA) where the limit is higher- typically 5%. 30 of the vapes seized had a nicotine content of 5% (50mg/ml). As regards the VNSN vapes whilst the packaging stated 0% Nicotine, both the ingredients and the warnings demonstrated that the products contained nicotine and were missing required traceability information.

You must make sure that any stock you order, particularly if you are ordering online, is intended for supply to the UK market.

Labelling of E-Cigarettes

Each unit pack (individual e-cigarette) must include a leaflet which provides the following information. If the required leaflet information can fit on the pack and other labelling within the pack without loss of legibility to the consumer, a separate leaflet insert is not required. Such information should include:

- Instructions for use and storage of the product, including a reference that the product is not recommended for use by young people and non-smokers;
- Contra-indications;
- Warnings for specific risk groups;
- Possible adverse effects;
- Addictiveness and toxicity;
- Contact details of the producer. The producer is any person who, in the course of a business, with a view to supplying the product for consumption in the United Kingdom or through the travel retail sector
 - manufacturers the product
 - puts a name, trade mark or other distinguishing mark on it by which the person is held out to be its manufacturer or originator; or
 - imports it into any part of the United Kingdom

The contact details for the importer into the United Kingdom was missing from the items seized as was other required information.

Each unit pack (individual e-cigarette) and any container pack (packaging containing one or more unit pack) must include:

- A list of all ingredients contained in the product set out in descending order by weight;
- An indication of the nicotine content of the product and the delivery per dose;
- The batch number
- A recommendation to keep the product out of reach of children.
- A warning on the front and back surfaces of the pack stating: **“This product contains nicotine which is a highly addictive substance”**. This wording must



Chartered Trading
Standards Institute
corporate affiliate member



Buckinghamshire & Surrey trading standards

- be used exactly as stated, occupy the greatest possible proportion of the space reserved for it and must cover 30% of the surface.
- Where the product contains more than 1.7% nicotine a red diamond containing a skull and cross bones and a raised tactile triangle is required.

None of the products seized from your premises had all of the necessary information.

Packs may not contain anything that:

- Promotes the product by creating an erroneous impression about its characteristics, health effects, risks or emissions.
- Suggests the product is less harmful, has health benefits or environmental advantages.
- Resembles a food or a cosmetic product (though images of the flavourings are acceptable).
- Suggests economic advantage – e.g. vouchers, offering discounts, free distribution, two-for-one, etc.

2 – What happens now to the products seized from your premises?

The non-compliances detected are likely to amount to criminal offences. If prosecuted and found guilty, you could face an unlimited fine and even imprisonment.

However, on this occasion this Authority does not intend to take formal action and is willing to work with you so that you understand the law and so that no further non-compliant products are supplied by you or returned into the supply chain. In addition, your premises will be visited again in the future to assess compliance. If further breaches of the above legislation are detected, it is unlikely that the same approach will be taken again.

Return of Seized Products

None of the products seized can be altered to bring them into compliance, therefore they will not be returned to you.

I understand that the supplier of these products was located at Charles House and whilst you were provided with invoices, these did not accurately describe all of the products you purchased; this should have indicated to you that there were problems with the devices supplied to you and this means that you are unable to provide traceability.

You are obliged to provide traceability under Regulation 8 of the General Product Safety Regulations 2005 and failure to do so could lead you to commit further criminal offences for which the penalty is a fine and or up to 3 months imprisonment.



Chartered Trading
Standards Institute
corporate affiliate member



Buckinghamshire & Surrey trading standards

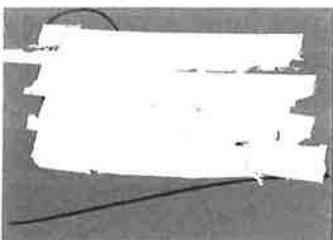
Action requested of you

Please can you sign both copies of this letter and return one to us at your earliest convenience and in any event no later than 7th June 2024 in the stamped addressed envelope that has been provided as well as the copy invoices. The second copy should be retained for your records.

If you are unsure about any of the content in this letter, please contact me at info@buckstads.com

I look forward to hearing from you.

Yours sincerely,



Supervisor - Trading Standards

Enclosed: a warning to be signed (and one copy for your records) and envelope.



Chartered Trading
Standards Institute
corporate affiliate member



Buckinghamshire & Surrey trading standards

Buckinghamshire & Surrey Trading Standards
Woodhatch Place, 11 Cockshot Hill, Reigate Surrey RH2 8EF

Tobacco and Related Products Regulations 2016
General Product Safety Regulations 2005
Classification, Labelling and Presentation of Substances and Mixtures Regulations

I confirm that I have received this Warning letter from Buckinghamshire and Surrey Trading Standards and that I understand that:

If I commit any offences under the above legislation, Trading Standards may investigate and consider taking formal legal action against me whether as an individual, sole trader, partner in a business or a company director in line with their enforcement policy.

Signed:

Name: Mr Pawandeep Bajaj

Dated:



Chartered Trading
Standards Institute
corporate affiliate member

