

## EuroHealthNet contribution to the Evaluation of the EU legislative framework for tobacco control - call for evidence

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EuroHealthNet is a not-for-profit European partnership of organisations, agencies and statutory bodies working on public health, health promotion, disease prevention, and reducing inequalities. With a long-term [commitment to health, equity, and wellbeing](#) EuroHealthNet recognises the importance of timely and comprehensive action addressing unhealthy and unsustainable lifestyles and behaviours, such as tobacco smoking and the use of novel tobacco products.

EuroHealthNet welcomes the European Commission's efforts launching an evaluation of the EU legislative framework for tobacco control brought about by the Europe's Beating Cancer Plan, which calls for a creation of a 'Tobacco-Free Generation' of less than 5% of the population using tobacco by 2040 (compared to about 25% today). [Reducing tobacco use among existing consumers and preventing take up by young people, accounting for vulnerabilities and inequalities are important objectives towards a Tobacco-Free Europe](#). In addition to our previous input to this avail ([here](#) and [here](#)), EuroHealthnet has also contributed with a [contribution to the European Commission imminent NCDs Healthier Together initiative](#) calling for stronger and more comprehensive tobacco control across the EU.

EU legislative tobacco control policies and initiatives have contributed to a decline in the tobacco consumption at the population level to some extent, but [there is room for improvement and bigger gains, notably in the area of placement, presentation \(plain packaging\), \(digital\) advertising and marketing, regulation of novel tobacco products and e-cigarettes, their content and taxation](#). This is particularly the case for the new generation of smokers (the youth, females). With [20% of smoking rates among young Europeans aged 15-24](#), 56% of smokers starting before the age of 18 and 93% before the age of 25, it is of utmost importance to prevent children, adolescents, young adults from taking up tobacco and nicotine use. Rates of smoking among (young) females have kept persistently stable and not falling fast enough, with a worrying increase in occasional tobacco use and uptake of novel tobacco products consumption, precisely. While overall smoking rates dropped slightly during the early days of the pandemic, the prolonged periods of lockdowns, social isolation and mental health strain may have increased smoking behaviours, especially among socio-economically vulnerable and deprived population groups, children and young adults, and women ([here](#) and [here](#)).

It should be noted that achieving the [EU legislative tobacco control's objective of ensuring a high level of protection of public health – especially for the more vulnerable – has been, unfortunately, undermined by inconsistencies across the applicable legislative acts exploited by tobacco and related industries](#). This has also, thankfully, brought attention to the importance and urgency of addressing the commercial determinants of health in this regard.

EuroHealthNet much agrees to this attention shift as aggressive commercial tactics for new products, new markets, and new population groups, plus reluctance to price increase of tobacco products have happened. We are particularly worried by regulatory gaps in the novel tobacco products market - [given the current narrative of presenting such products as a 'healthier' or 'safer' alternative to traditional tobacco products, we strongly urge a cautionary approach to their active promotion until more evidence for their safety is presented through rigorous independent reviews](#). Until then, it is prudent to consider them as a potentially harmful and addictive products, to be regulated and taxed in an equivalent manner to conventional cigarettes. Spitefully, rather than serving its 'intended' purpose of being 'an alternative', the [2017 Eurobarometer](#) on attitudes of Europeans towards tobacco and e-cigarettes showed that dual use of those products is wide-spread and rising, and that novel products help full tobacco cessation only to a limited extent, if at all. For 5% of Europeans the novel tobacco products served as a gateway to taking up smoking for the first time and getting addicted, as is it the case for the youth, confirmed by the most recent [Scientific Committee on Health, Environmental and Emerging Risks \(SCHEER\) expert opinion on electronic cigarettes](#).

An evaluation of an EU legislative tobacco control policies framework should certainly further progress on tobacco (novel products) pricing and taxation, as mentioned earlier. Tobacco taxation is a very cost-effective public health prevention and economic measure as revenues increase while smoking rates fall. The [EuroHealthNet partnership strongly supports the continued increase of excise duties and taxation on traditional tobacco products, expanding the fiscal measures onto the novel addictive products in conjunction with comprehensive and easily accessible tobacco cessation services](#). This approach is best placed to optimise switching from tobacco products whilst deterring (youth) initiation and dual-use with novel products and raising public revenues, which could then be diverted to further support prevention and cessation programmes (such as QuitLines, 'Stopobers', utilising social marketing techniques for addressing addictions), investing in (digital) health literacy and health education.