Time to revise the EU Tobacco Products Directive

New “tobacco-free” nicotine products are becoming more popular across the globe, facilitating and legitimizing the expansion of the tobacco industry. The products are often marketed as safer and more sustainable alternatives to deadly cigarettes, misleading consumers, media and international institutions. A Non Smoking Generation, a Swedish NGO, writes this letter in good will to inform the EU and other international institutions about the negative effects of all non-pharmaceutical nicotine products. To promote global health and sustainable development we call for a revision of the EU Tobacco Products Directive.

Survival of the tobacco industry. Smoking is declining in many European countries as a result of tobacco control efforts and increased knowledge about health risks. The tobacco industry is threatened and their response is to develop new products such as e-cigarettes, heated tobacco products and oral nicotine pouches, which can appeal to new customers. The latter originates from Sweden where many young people now use it. Due to the rapid increase in popularity, many multinational tobacco companies have launched their own brands and are expanding their markets all over the world. The nicotine pouches are often considered a modern, white and “fresh” version of the traditional oral tobacco product “snus”. It is now broadly marketed as “tobacco-free” - even though the nicotine is extracted from tobacco. There is an urgent need to reveal the lies of the tobacco industry before the European community is facing an epidemic of nicotine addiction on an even larger scale.

The harmful cover-up of “harm-reduction”. The marketing of new nicotine products as “tobacco-free” is a strategy designed to circumvent national legislations regulating tobacco products. By claiming their products are free from tobacco, the companies found a legal loophole and these new products are now exempted from rules on marketing, taxation, age limits, sales permits and so on. Another purpose of this strategy is to make these products appear less harmful. The companies claim that their new products are better alternatives to cigarettes, and can help adult smokers quit, in hope to improve their image and to convince consumers, investors and policymakers that they are trying to contribute to a better society. This is simply a cover to hide and at the same time promote their true agenda; to lure youth into a lifetime of nicotine addiction. The tobacco industry knows that almost all tobacco users start when they are teenagers. The nicotine pouches, that come in thousands of flavours and are marketed through influencers in social media, are undoubtedly made to appeal to young people. As long as these products are unregulated the industry can and will continue to target every young generation, and their “harm reduction-agenda” will only cause more harm.

But nicotine is not as dangerous as cigarettes? When promoting oral tobacco products the tobacco companies constantly repeat the same argument; “smoking and the burning of tobacco is the problem, not the nicotine”. By highlighting health benefits of smokeless tobacco products in comparison with cigarettes – that kill eight million people globally every year - the industry aims to portray these products as part of the solution to the global tobacco epidemic. This strategy also works to disguise the severe health effects of nicotine, which tend to be undermined and disregarded despite the substantial amount of studies proving that nicotine is far more than addictive. Nicotine permanently damages the brain, impairs cognitive functions and increases risk of mental illness; type 2-diabetes, cardiovascular disease, lung disease, birth defects and other addictions. Young people are especially vulnerable to cognitive damage and risk long-term complications. There is compelling scientific evidence emphasizing the need to prevent nicotine addiction, no matter which product, for the sake of public health.
**Human rights violations and environmental impact.** The on-going debate on relative risks and “harm-reduction” is not only stalling necessary efforts to enhance global health, but also threatens a fair and sustainable development. Tobacco counteracts all 17 of the Sustainable Development Goals, and is not only a cause of death and disease, but also poverty, inequality, child labour, deforestation, loss of biodiversity, pollution and waste. Every international institution and policy makers on all levels need to be informed about the health risks of nicotine and the wide array of negative effects of the entire production chain. This knowledge undermines all (tobacco industry) arguments motivating “special treatment” of some products in legislation or investment portfolios. The upcoming due diligence law within the EU should result in big tobacco companies being held accountable for extensive human rights violations and environmental impact. The proposed import ban on products associated with forced or child labour hopefully pressures companies to take responsibility and prevent the exploitation of tobacco farmers and their children at the bottom of their supply chains.

**Tobacco control.** Since WHO adopted the framework convention on tobacco control (FCTC) in 2003, all parties have had access to the knowledge needed to reduce and prevent tobacco use. The Convention clearly outlines measures to phase out all tobacco products (products entirely or partly made of the leaf tobacco) and exclude tobacco industry influence from public health policy. Europe’s new Beating Cancer Plan, which entails a vision of a tobacco-free generation, indicates that EU is on the right track. The plan promotes stricter regulation on new products, including a full ban on flavours, extending taxation to new tobacco products, extending smoke-free environments to cover e-cigarettes and heated tobacco products, and measures to counteract the marketing of tobacco on the Internet and social media – all in order to protect young people.

In line with the FCTC, the Beating Cancer Plan and the upcoming due diligence law, the EU should revise the Tobacco Products Directive and the Tobacco Taxation Directive. By including and regulating all non-pharmaceutical nicotine products the EU can protect European youth from nicotine addiction and at the same time lead the way towards a more just and sustainable world.

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