



To: Members of the European Parliament

Re: plenary vote on the tobacco products directive & perspective of patients with respiratory diseases

Brussels, the 3rd of October 2013

Dear Member of the European Parliament,

Next Tuesday, the 8th of October, you will be voting on the proposal for the directive on the approximation of Member States laws, regulations and administrative provisions concerning the manufacture, presentation and sale of tobacco and related products – [2012/0366\(COD\)](#).

As representatives of patients with allergy, asthma and chronic obstructive pulmonary disease (COPD), we are very much concerned about tobacco use and marketing in Europe and the effects it has on citizens' health. Tobacco is a major source of nuisance and exacerbation for people with asthma, allergy and COPD. In particular, the World Health Organisation (WHO) estimates that tobacco smoke is the primary cause of **COPD** in developed countries.¹ Lifelong smokers have a 50% probability of developing COPD during their lifetime; along the same line, there is also evidence that the risk of developing COPD falls by about half with smoking cessation.² Research shows that smoking and exposure to second hand smoke is a major factor in provoking **allergic** responses by babies and young children.³ Smoking in **asthma** is associated with a higher degree of asthma severity, worsening of symptoms, increased hospital admissions, accelerated decline in lung function, limited short-term responses to medicines and poorer asthma control.⁴

Following the unfortunate delay in the vote in September, we are extremely concerned that the strong position adopted by the ENVI committee in July 2013 is at risk of being diluted from unprecedented, intensive lobbying by the tobacco industry. As most European citizens support stronger tobacco control measures and tobacco remains the major cause of preventable deaths and diseases, causing 700,000 deaths each year in the EU, **we call on you to protect the health of all EU citizens** by:

¹ WHO, *COPD factsheet*, November 2012, available at: <http://www.who.int/mediacentre/factsheets/fs315/en/>.

² Laniado-Laborin L., *Smoking and Chronic Obstructive Pulmonary Disease (COPD). Parallel Epidemics of the 21st Century*, in International Journal of Environmental Research and Public Health, 2009.

³ Kulig M., Luck W., Lau S., Niggemann B., Bergmann R., Klettke U., Guggenmoos-Holzmann I., Wahn U., *Effect of pre- and post-natal tobacco smoke exposure on specific sensitisation to food and inhalant allergens during the first years of life*, in Allergy, March 1999. Halken S., *Prevention of allergic disease in childhood: clinical and epidemiological aspects of primary and secondary prevention*, in Pediatric Allergy Immunology, June 2004.

⁴ Thomson N. C., Chaudhuri R., Livingston E., *Asthma and cigarettes smoking*, in European Respiratory Journal, November 2004. Fattahi F., Hylkema M. N., Melgert B. N., Timens W., Postma D. S., ten Hacken N.H., *Smoking and nonsmoking asthma: differences in clinical outcome and pathogenesis*, in Expert Review of Respiratory Medicine, February 2011. Polosa R., Thomson N. C., *Smoking and asthma: dangerous liaison*, in European Respiratory Journal, August 2012.

1. Support mandatory combined health warnings covering 75% of the front and back of tobacco products packages

Graphic warnings are more effective than text-only messages in reducing the attractiveness of tobacco products to children and young people, and increasing the size of these messages enhances the effectiveness of the warning. **In Canada the smoking rate amongst 15-19 year-olds was 12% in 2011, half the rate of the same age group in 2000. In Uruguay, since the introduction of pictorial warnings in 2005, smoking among 15-17 year-olds has decreased by 8% annually** (see the slide attached).

Support amendments 1, 21-22, 51, 54

Reject amendments 97-98, 103, 120, 142, 150, 153, 155, 158-159, 161, 168, 181, 184

2. Support a comprehensive ban on characterising flavours including menthol

The tobacco industry uses certain flavourings in the manufacturing of tobacco products in order to make them more palatable, decrease the irritation they cause and increase their smoothness and attractiveness particularly for young people, as well as to create the misleading impression that they are less harmful. **The proposed ban does not affect the use of additives like sugars in Europe-grown tobacco, such as Burley, and therefore it will not harm European tobacco growers.**

Support amendments 10-12, 15, 50, 85

Reject amendments 95, 132-133, 143, 145-147

3. Support the ban on misleading product descriptions and slim cigarettes

Evidence shows that **slim cigarettes are targeted at girls and young women by conveying misleading impressions of reduced harm and associations with glamour and a thin figure.**

Reject amendments 88, 104, 121, 144, 148

4. Support stronger measures against illicit trade in tobacco products

Illicit trade is a considerable burden in terms of tax loss and the availability of cheaper tobacco products that evade tax and duties. Traceability and identification features of tobacco packs are ones of the most effective measures Member States can use to tackle this problem. **Information obtained through the unique identifiers should not be limited to the first buyer, but apply to the whole supply chain.**

Support amendments 25, 61-62, 67

Reject amendments 108, 163, 185

5. Support the regulation of e-cigarettes

Over the last few years an array of new nicotine containing products, such as e-cigarettes, has been developed. **These products should be seen as the other nicotine replacement treatments and need to be properly regulated for ensuring appropriate safeguards in terms of quality, safety and efficacy.**

Support amendments 33-34, 36, 71

Reject amendments 110, 117, 130, 135-136

6. Support more in general public health concerns

Tobacco is a proven carcinogen and its use has negative consequences especially for **vulnerable groups**, such as children and patients, whose rights need to be protected. The **display ban and the ban on online sale and free distribution of products** will protect EU consumers from the consequences of easily accessible, harmful products. **Plain standardised packaging** (harmonising the size and shape of tobacco packages, removing attractive colours and standardising the branding) is proven to reduce the appeal of tobacco to children and young people and to reinforce the health warning messages. The **status quo on snus** that like all tobacco products is addictive and presents hazards to health has to be maintained.

Support amendments 4-5, 16-18, 23-24, 29-30, 40, 45, 58, 68-69, 86, 115, 175, 180

Reject amendments 105-106, 122-124, 162

Adopting the tobacco products directive during the current mandate of the European Parliament has been a **shared objective of the European Parliament, Commission and successive Presidencies** of the Council since the launch of the proposal. This directive is not only **one of the last major pieces of EU legislation that will be adopted before next year's elections**, but also **one of your last opportunities to make a meaningful difference to the next generation** of European citizens. Your vote in support for a strong tobacco products directive in the plenary has the **potential to create a future free of tobacco-caused deaths and diseases and to protect Europe's children** from taking up the deadly habit of smoking.

We therefore urge you to support a strong tobacco products directive by backing the position of the ENVI committee and giving a mandate to the Rapporteur and shadow Rapporteurs to negotiate with the Council to reach a first reading agreement before the European elections of 2014.

For all references and additional information, please check EFA's position paper available on our website at: <http://www.efanet.org/wp-content/uploads/2013/06/EFA-position-on-TPD.pdf>.

Yours sincerely,



Breda Flood

EFA President

Attachment: Effectiveness of large health warnings in Canada

The European Federation of Allergy and Airways Diseases Patients' Associations (EFA) is a non-profit network of allergy, asthma and COPD patients organisations, representing 35 national associations in 22 countries and over 400,000 patients. EFA is dedicated to making Europe a place where people with allergies, asthma and COPD have the right to best quality of care and safe environment, live uncompromised lives and are actively involved in all decisions influencing their health. www.efanet.org