

EFA statement on the evaluation of the EU legislative framework for tobacco control (Directorate General for Health and Food Safety)

The European Federation of Allergy and Airways Diseases Patients' Associations (EFA) is the voice of over 200 million people living with allergy, asthma, and chronic obstructive pulmonary disease (COPD) in Europe. We bring together 45 national associations from 26 countries and channel their knowledge and patients' needs to the European institutions.

Tobacco is one of the most serious epidemics of our times, provoking an unacceptable health burden and death across Europe. According to the Global Burden of Disease (GBD) study, in 2019 alone tobacco use was responsible for over 907,000 premature deaths and over 22,150,000 Disability-Adjusted Life Years (DALYs) in the EU. Moreover, passive exposure to second-hand smoke accounted for over 73,000 deaths and almost 1,760,000 DALYs. These grim figures make tobacco the **single largest preventable cause of disease, disability and death in Europe**, and a major public health threat.

In the context of the evaluation of the existing EU framework for tobacco control, EFA would like to highlight the following considerations:

- **The current legal framework has limited control tools over novel tobacco products**, which enjoy an increasing popularity, especially among the youth. Products such as e-cigarettes and heated tobacco products (HTPs) contain toxic and harmful chemicals that lead to lung damage, higher occurrence of respiratory disease and more frequent respiratory symptoms among lung patients. In addition, they contain nicotine, a highly addictive substance that prevents users from quitting smoking.
- Measures against **waterpipe tobacco/hookah/shisha** are largely missing from the current provisions. EFA is highly concerned over the recent increasing numbers of waterpipe tobacco in Europe, mainly young users. Smoking waterpipe tobacco is associated with the same adverse health effects as cigarette smoking, including COPD and reduced pulmonary function. This is due to their content of hazardous toxicants such as nicotine and carbon monoxide.
- The Tobacco Advertisement Directive clearly needs to be revised to be relevant, having remained unchanged for 20 years now. The update should aim to close loopholes, remove opportunities for indirect advertising, promotion and sponsorship, and reflect market and societal developments. As per these principles, the new provisions must, among others, introduce a **strict framework for novel products such as e-cigarettes and HTPs**, addressing them in the same way as traditional tobacco; set a **more specific definition of information society services**, to include all contemporary promotional channels such as social media; broaden advertisement beyond the single product promotion to **address the promotion of smoking and vaping as a whole**, not necessarily linked to a product; and ban the **marketing of tobacco and novel products targeting the youth**, including in-person promotion in bars and nightclubs.