



**ENSP**  
European Network  
for Smoking and Tobacco Prevention



**ERS** EUROPEAN  
RESPIRATORY  
SOCIETY  
every breath counts



Brussels, 20 March 2025

**Olivér Várhelyi**  
**László Andrejkó**  
**Sandra Gallina**  
**Antonio Parenti**  
**Marianne Takki**

**Subject: Revision of the EU Tobacco Products, Taxation and Advertising Directives**

Honourable Olivér Várhelyi,

We are writing to you on behalf of the [Smoke Free Partnership](#) Coalition (SFP), a coalition of 58 civil society organisations across Europe dedicated to policy analysis and advocacy for the implementation of the World Health Organization Framework Convention on Tobacco Control. In collaboration with the [European Respiratory Society](#) (ERS); the world's largest scientific and clinical organisation in respiratory medicine, representing over 35,000 clinicians, scientists, and healthcare professionals across 160+ countries, the [European Network for Smoking and Tobacco Prevention](#) (ENSP); a Brussels based tobacco control organisation active for over 28 years in the field of tobacco control. With more than 80 members, including national coalitions, and the [European Cancer Organisation](#) (ECO): the largest multi-professional cancer organisation in Europe. **Together we strongly support the call from 12 EU Member States for an urgent revision of the Tobacco Products Directive, the Tobacco Advertising Directive and the Tobacco Taxation Directive<sup>1</sup>.**

First, we would like to congratulate the Commission and DG SANTE on the adoption of the new Council Recommendation on Smoke- and Aerosol-Free Environments. This pivotal step is crucial in protecting vulnerable groups, particularly children, youth, and non-smokers, from the harmful effects of tobacco and aerosol exposure.

To further support these efforts, the SFP, in collaboration with its experts, has developed a [position paper](#) outlining essential revisions needed for a more effective and up-to-date Tobacco Products Directive (TPD).

After more than a decade since the last revision of the Tobacco Products Directive in 2014, the emergence of novel tobacco and nicotine products has fundamentally reshaped the products' landscape. Tobacco consumption causes over 700,000 deaths annually in Europe, equivalent to the population of Frankfurt or Krakow, and incurs a €779 billion health and socio-economic cost<sup>2</sup>. Tobacco remains a leading cause of preventable deaths, responsible for 27% of all cancer cases in the EU.

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<sup>1</sup> [Tabaksbeleid | Tweede Kamer der Staten-Generaal](#)

<sup>2</sup> The social cost includes public healthcare expenditure, smoking-related productivity loss, and premature mortality attributable to smoking. The estimates of social cost of smoking in the EU-27 are based on the data presented in the latest available report "A study on liability and the health costs of smoking", DG SANCO (2008/c6/046) and have been updated for inflation.

While the last Tobacco Products Directive revision led to a 3-percentage-point drop in smoking between 2017 and 2020, the absence of timely updates, despite the roadmap outlined in Europe's Beating Cancer Plan, has stalled further progress.

Alarmingly, we are seeing an increase of cigarette smoking from 20% to 22% between 2020 and 2023, among 15 to 24 year olds, according to the Eurobarometer report published in 2024<sup>3</sup>. Additionally, the rising use of heated tobacco products (2% prevalence in 2020 and 2023), e-cigarettes (prevalence of use increased from 4% in 2020 to 6% in 2023), and of nicotine pouches among young people (15-24) threatens to reverse the gains achieved.

Furthermore, as the Commission moves forward with revising key tobacco control directives, we underscore the value of findings from the Joint Action on Tobacco Control<sup>4</sup> (JACT) and JACT2 projects, both co-funded under the EU Health Programme. These initiatives have yielded vital insights into legislative implementation and gaps across EU Member States. While JACT has focused on compliance and best practices, JACT2 has strengthened enforcement mechanisms, enhanced surveillance of novel products, and built regulatory capacity at national level.

We would also like to draw your attention to the pressing call on the European Commission by the European Court of Justice, expressed during a hearing in case C-155/24 on March 10<sup>th</sup><sup>5</sup>, to replace the measurement method for tar, nicotine and carbon monoxide by the scientifically approved WHO TobLabNet SOP 1 method<sup>6</sup>.

We remain available, should you wish to discuss our recommendations further. Given your strong stance on the need for greater EU action in public health, we appreciate your commitment to strengthening tobacco control policies and ensuring that political will does not become a barrier to much-needed progress in this area.

We look forward to hearing from you.

Your sincerely,

Lilia Olefir  
Director Smoke Free Partnership  
[lilia.olefir@smokefreepartnership.eu](mailto:lilia.olefir@smokefreepartnership.eu)

Dr. Csaba L. Dégi  
President European Cancer Organisation

Dr Filippos Filippidos  
Chair the ERS Tobacco Control Committee

Cornel Radu-Loghin  
Secretary General ENSP

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<sup>3</sup> [SFP Infographic: Improve Health, Reduce Costs - SmokeFree Partnership](#)

<sup>4</sup> European Commission. Joint Action on Tobacco Control (JATC): Final Technical Report. [D1.2\\_Final-report.pdf](#)

<sup>5</sup> [Hearing in case C-155/24](#); a report on the hearing can be found at [tabaknee.nl](http://tabaknee.nl)

<sup>6</sup> [WHO TobLabNet SOP 1 - Standard operating procedure for intense smoking of cigarettes](#)

## **List of organisations supporting and endorsing this letter:**

1. Association of European Cancer Leagues
2. Standing Committee of European Doctors
3. EuroHealthNet
4. European Heart Network
5. Health and Environment Alliance
6. INWAT Europe
7. European Medical Students Association
8. Smoke Free Life Coalition Bulgaria
9. Progressive Reinforcement of Organizations and Individuals
10. Unfairtobacco
11. Danish Cancer Society
12. XQNS! Spain
13. Grupo I + D en Economía, Políticas Públicas y Salud
14. Comité Nacional de Prevención del Tabaquismo
15. Institut Català d'Ornitologia
16. Cancer Society of Finland
17. Suomen ASH
18. Comité National Contre le Tabagisme
19. Alliance contre le tabac
20. La Ligue contre le cancer
21. ASH Ireland
22. Irish Heart Foundation
23. Irish Cancer Society
24. Smoke Free Israel
25. Società Italiana di Tabaccologia
26. Lithuanian National Tobacco and Alcohol Control Coalition
27. Institute of Public Health of Republic of Macedonia
28. NVO JUVENTAS
29. Gezondheidsfondsen voor Rookvrij
30. Dutch Cancer Society
31. Dutch Heart Foundation/Health Funds for a Smokefree Netherlands
32. Youth Smoking Prevention
33. Kreftforeningen, Norwegian Cancer Society
34. National Health Institute / University of Gdansk
35. Fondation Cancer Luxembourg
36. Asociación Española Contra el Cáncer
37. Centro de Apoio, Tratamento e Recuperação, IPSS
38. Asociația Română pentru Promovarea Sănătății (Romanian Association for Health Promotion)
39. Association Healthy Romania 2035
40. The Institute of Economic Sciences, Serbia
41. Serbian Society for the Fight Against Cancer
42. Association Health Mission
43. No Excuse Slovenia
44. Slovenian NCD Alliance
45. Slovenian Coalition for Public Health, Environment and Tobacco Control
46. Tobaksfakta: A think tank on tobacco

47. Swedish Cancer Society (Cancerfonden)
48. Health Institute Association
49. Advocacy Centre LIFE
50. ASH Scotland
51. ASH Wales
52. Fresh - Balance
53. UK Centre for Tobacco and Alcohol Studies
54. Campaign for Tobacco Free Kids
55. Kosovo Advocacy and Development Center

