

Dear President of the Commission and European Commissioners:

We, the undersigned experts in public health, nicotine dependence and tobacco control, write to you out of concern over the forthcoming review of the Tobacco Excise Directive, which is expected to impose new taxes on less harmful nicotine products.

Public health policies should use the best available scientific evidence. It is, therefore, a matter of significant concern that recent EU public communications,^{1,2} claiming that non-combustible nicotine delivery products pose health risks comparable to combustible cigarettes, contradict the best available scientific evidence. This position is not only a significant departure from the foundational principle of evidence-based public health but also undermines the European Commission's vital commitments to data-driven legislation and to combatting disinformation.

Smoking remains the leading cause of preventable death in the EU, with nearly 700,000 premature deaths annually. Twenty-six percent of citizens (29% among 15–24-year-olds) still smoke.³

Extensive scientific evidence has proven that non-combustible nicotine products such as e-cigarettes, heated tobacco products and nicotine pouches are substantially less harmful than cigarettes. These products have also helped millions quit smoking.

- In Sweden, where snus and nicotine pouches are commonly used, daily tobacco use is the lowest in the EU (<5%) and cancer incidence is 41% below the EU average, despite overall nicotine use being similar to the EU average.⁴
- In the United Kingdom where the government encourages smokers to switch to vaping, smoking has fallen from 17% to 12% in five years.⁵
- In New Zealand, daily smoking dropped to 7% in 2023/24, from 16% in 2011/12, while daily vaping has risen to 11%.⁶

Regulation should be guided by science. Ideological or moral beliefs should not guide public health policies and must not override the facts and the goal to improve the health and lives of Europeans. Protection of minors is important, but it can be achieved by proper implementation of the already established regulation on advertising and sales, without hindering the public health objectives of reducing death and disease caused by smoking.

Smokers should have access to non-combustible alternatives. Fiscal and regulatory provisions that discourage the switch from smoking to less risky alternatives are unethical and protect the cigarettes trade.

Commissioners, public health in Europe stands at a crossroads: in the coming months, the European Commission intends to advance Tobacco Products Directive and the Tobacco Excise Directive. Implementing a “tax-raid” on potentially life-saving products will keep smokers smoking, will harm public health, and will set a bad paradigm for other countries (particularly LMICs) and regions globally.

Sources

1. <https://x.com/OliverVarhelyi/status/1945539807523832261>
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3. https://health.ec.europa.eu/tobacco/overview_en
4. <https://smokefreesweden.org/No%20Smoke%20Less%20Harm.pdf>
5. https://ashscotland.org.uk/wp-content/uploads/2025/07/Smoking-and-vaping-statistics-factsheet_June_2025.pdf
6. <https://www.health.govt.nz/statistics-research/surveys/new-zealand-health-survey/publications/202324-survey-publications/trends-in-smoking-and-vaping>

Sincerely,

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- **PRDT** — Spanish Medical Platform for Tobacco Harm Reduction. EU Transparency Register: 166296541422-35
- **SCOHRE** — International Association for Smoking Control and Harm Reduction, Michel Ange 12, B-1000 Brussels, Belgium.
- **Tobacco Harm Reduction, Inc.** (THR101) — Registered 501(c)(3) nonprofit organization dedicated to promoting public health through science-based education, research, and advocacy. Florida, USA