

TOBACCO PRODUCTS AND TOBACCO ADVERTISING – REVISION OF EU RULES

CALL FOR EVIDENCE



June 12, 2026

SCOHRE, an International scientific Association of independent experts on Smoking Control & Harm Reduction, considers that the revision of the Tobacco Products Directive (TPD) is a timely opportunity to strengthen public health policies through a more comprehensive, science-based approach. Smoking remains a leading cause of preventable disease and death, and despite the efforts, its burden continues to be substantial across many countries. This highlights the need to complement existing prevention and cessation strategies with policies that reflect evolving scientific understanding and real-world experience.

SCOHRE supports a rational risk-benefit analysis focused on maximum reduction in the death and disease caused by cigarette smoking, including efforts to prevent smoking initiation, particularly among young people, which needs to remain an important public health priority. Effective regulation should include strict safeguards to limit access and address emerging challenges, such as online promotion and the influence of social media and influencers, which may increase exposure and uptake among adolescents. Prevention strategies should also be reinforced through education and health literacy initiatives targeting both young people and the wider population.

Smoking cessation remains the most effective intervention to reduce smoking-related morbidity and mortality. However, both clinical experience and population-level data show that quitting smoking is often difficult, with many smokers experiencing repeated attempts and frequent relapse. Strengthening access to evidence-based cessation services, improving the training of healthcare professionals, and ensuring balanced and accurate information for smokers are essential components of effective policy.

SCOHRE also emphasizes the importance of acknowledging the concept of harm reduction within a comprehensive approach to smoking control. International experience and scientific dialogue, including discussions held at SCOHRE's recent 8th Summit on Tobacco Harm Reduction (Athens, 2025), reflect increasing interest in integrating harm reduction principles alongside prevention and cessation. In this context, real-world observations from countries such as Sweden, where smoking prevalence has reached among the lowest levels in Europe, highlight the importance of considering population-level outcomes when assessing different policy approaches, alongside broader changes in tobacco use patterns, including increased use of alternative nicotine products among adult populations. Furthermore, the importance of evaluating relative risk, alongside absolute risk, is critical for supporting more proportionate and evidence-informed regulatory approaches.

Ultimately, SCOHRE advocates for a balanced and evidence-based policy framework that integrates prevention, smoking cessation, education, protection of youth, and the evaluation of harm reduction and relative risk. Such an approach, based on science and informed by clinical expertise and international collaboration, is more likely to achieve meaningful and sustainable reductions in the burden of smoking-related disease.

SCOHRE'S SCOPE

SCOHRE is an International scientific Association of independent experts on Smoking Control & Harm Reduction, who seek an open and constructive dialogue to help come up with a new approach to smoking control policies. We believe that smoking cessation and smoking prevention is the primary goal of our societies, and that the adoption of harm reduction policies may be considered as the 3rd pillar for tobacco control together with smoking cessation and smoking prevention to secure a healthier future particularly for the younger generations.

Despite all efforts for the implementation of the Framework Convention on Tobacco Control (FCTC), smoking is still a major public health issue; the number of smokers exceeds 1 billion; we count more than 8 million premature deaths every year from smoking-related diseases.

SCOHRE supports the efforts worldwide to protect the non-smokers and the ex-smokers from any new forms of tobacco/nicotine consumption. Additionally, we fully support any effort to regulate nicotine-free e-cigarettes and herbal smoking products. However, in an era of technological innovation, new approaches continuously emerge based on less risky alternatives than cigarettes. For those smokers who for various reasons will not otherwise give up smoking completely, switching to less harmful products will have a tremendously positive effect. Novel tobacco products and Nicotine Delivery Systems such as electronic cigarettes, heated tobacco products and nicotine pouches could be considered as lower-risk alternative to smoking with mounting scientific evidence that shows reduced exposure to toxicants compared to smoking.

Unfortunately, several times, policy discussions usually are focused on the potential harms of new technology, while ignoring its potential benefits and looking at how to best use that new technology to achieve health gains:

“Debates over new technology are part of a long history of social discourse over new products. The focus tends to be on the unintended risks of new products rather than on unintended benefits.¹”

It is agreed that although nicotine is addictive, it only plays a minor role in smoking related mortality, and it has been successfully used as a medication in smoking control and smoking cessation. It is well established that the main cause leading to smoking-related diseases is the harmful chemicals that are mainly formed during the process of combustion. As stated by the FDA, the US Food and Drug Administration, “*Noncombustible products, such as heat-not-burn tobacco products, smokeless tobacco, and e-cigarettes, fall somewhere in between combustible products and NRTs²*”.

Smoking cessation and prevention remain the two most impactful and cost-effective interventions in medicine but have been unable to prevent the smoking epidemic. We believe that smoking control strategies should be reshaped to include harm reduction, and alternative lower risk products should be encouraged, besides the traditional smoking cessation and smoking prevention measures. There is no reasonable doubt that a variety of products are significantly less hazardous than smoking cigarettes. In the case of snus (and, thus, nicotine pouches) that risk is minimal. With vaping and HTPs the difference is also huge.

Many governmental bodies and independent researchers have conducted literature reviews or performed research on alternative to cigarettes products. Some of the key scientific findings for e-cigarettes and HTPs are referred below:

- According to the data available so far, it seems that most of the toxins in cigarette smoke are not found in e-cigarette vapor or HTPs' aerosol and those present are at much lower levels³⁻⁶.
- **e-cigarettes:** The lifetime cancer risk from vaping has been estimated to be less than 0.5% of the risk of smoking⁷.
- **HTPs:** Based on a study funded by the Netherlands Food and Consumer Product Safety Authority (NVWA), the researchers developed a method to estimate risk –or assess the potential magnitude of the health impact– between tobacco products. In the conclusion they stated that “*the Change in Cumulated Emission (CCE) most*

likely amounts to a factor between 10 and 25 when comparing a leading variant of HTPs with cigarettes, and that even the lower bound of this uncertainty range would be associated with a substantial health impact in favour of HTP”⁸.

3

Regulatory Authorities, e.g. FDA, have issued positive decisions following consideration of the existing scientific evidence for some alternative to cigarettes products: (1) **SNUS**: “Using General Snus instead of cigarettes puts you at a lower risk of mouth cancer, heart disease, lung cancer, stroke, emphysema, and chronic bronchitis⁹.” (2) **HTP**: “Scientific studies have shown that switching completely from conventional cigarettes to the IQOS system significantly reduces your body’s exposure to harmful or potentially harmful chemicals¹⁰.”

The SNUS case in Sweden provides the most compelling evidence that nicotine is not responsible for most of the detrimental effects of smoking¹¹. Sweden is one of the few countries globally where snus has been used for decades and smoking rates have fallen from 15% to 5.6% over the past 15 years¹², leading to lower death rates from cardiovascular disease, lung cancer, and other cancers, compared to the rest of Europe¹¹. This evidence should not be ignored or misrepresented.

If the new tobacco and nicotine products are taxed or regulated in the same way as conventional cigarettes, this will be damaging to public health and protective of the cigarette trade. Applying the same measures to all products when cigarettes are known to be far more toxic than novel alternatives will deteriorate public health outcomes.

Fundamental Justice

We also recommend that the EU consider issues of fundamental justice when considering this directive. Cigarette smoking is a dependence-based activity focused on nicotine delivery. A great many of the people in the EU who are smoking cigarettes are already marginalized and economically disadvantaged. A nicotine abstinence-only agenda is simply inhumane knowing what we do about cessation rates. Measures that seek to simply raise prices for the full category of substitutable consumer products fails to empower them to make better health decisions, reducing the economic incentive to reduce risks while implicitly misinforming them on issues of relative risk.

Illicit Trade, and other Foreseeable Risks

Tax-mandated tax increases give consumers an incentive to change behaviours. But unless policies are well crafted the choices made are not necessarily what the policy makers had in mind, despite these alternative actions being readily identifiable. In the absence of a significant economic and informational incentive to move to lower risk alternatives there are other, clearly deleterious, options to deal with the price change. Illicit trade is the most obvious and these networks are already in place and can be expected to respond to greater profit potential. But income-limited people can also be expected to smoke more intensely to compensate for fewer cigarettes, and to give up necessities of life for themselves and any dependents in to reallocate finances to deal with their dependency.

Increase the price of cigarettes will spur the pursuit of alternatives. To increase the price of low-risk alternatives will block an exit. Such a plan makes no more sense than seeking to address a burning theatre by pouring on petrol while barring the fire escapes.

-
1. Innovation and Its Enemies: Why People Resist New Technologies. Calestous Juma, Oxford University Press, 2016.
 2. [Nicotine Is Why Tobacco Products Are Addictive | FDA](#); [Health Effects of Tobacco Use | FDA](#)
 3. [E-cigarettes and harm reduction: an evidence review, Royal College of Physicians \(2024\)](#)
 4. [Levels of selected analytes in the emissions of “heat not burn” tobacco products that are relevant to assess human health risks \(springer.com\)](#)
 5. [Heated Tobacco Products: A Review of Current Knowledge and Initial Assessments – PMC \(nih.gov\)](#)

6. [tobaccocontrol-2018-054419.pdf \(nih.gov\)](#)
7. [Comparing the cancer potencies of emissions from vapourised nicotine products including e-cigarettes with those of tobacco smoke, Tobacco Control 2017](#)
8. [A Method for Comparing the Impact on Carcinogenicity of Tobacco Products: A Case Study on Heated Tobacco Versus Cigarettes – Slob – 2020 – Risk Analysis – Wiley Online Library](#)
9. [FDA grants first-ever modified risk orders to eight smokeless tobacco products | FDA](#)
10. [FDA Authorizes Marketing of IQOS Tobacco Heating System with 'Reduced Exposure' Information | FDA](#)
11. The Global Burden of Disease Study by LM. Ramström (2020)
12. Swedish snus and public health, Lakeville (2021)



GENERAL INFORMATION ON SCOHRE

SCOHRE is an International scientific Association of independent experts on Smoking Control & Harm Reduction, who seek an open and constructive dialogue to help come up with a new approach to smoking control policies.

Our purpose is to provide stakeholders with science-based balanced information. Tobacco harm reduction debate is still at an early stage and more research and publications are needed.

- We need to raise awareness on existing knowledge, benefit from already existing solid expertise in many countries, and create more opportunities for education of health policy experts, regulators, and the public.
- We will work to generate more evidence that harm reduction in smoking should be implemented along with smoking prevention and smoking cessation to counteract the detrimental effects of smoking.
- We will establish new research to generate more evidence to cast out all doubt.

SCOHRE ACTIONS - 10 public health proposals on smoking control

SCOHRE supports all efforts of governments to address the burden of disease and death caused by smoking.

In this view, you can find below the 10 public health proposals on smoking control, which were presented during SCOHRE's [7th Summit on Tobacco Harm Reduction](#) (16-17 September 2024):

SCOHRE | 10 public health proposals on smoking control

- 1. awareness and informed decisions:** Making an informed decision involves two key aspects: first, having access to the necessary information, and second, using that information to assess what is personally significant in relation to the decision at hand. Decision aids can support smokers in this process by helping them make informed choices. These aids typically consist of two components: (1) providing balanced, objective information, and (2) utilizing value clarification methods, which assist individuals in identifying what they personally find important regarding the decision in question.
- 2. bioethics & human rights:** Human rights should be central to policy decisions on nicotine products. International bioethics protocols emphasize the importance of informed consent and consumer empowerment—ultimately, people matter. Policies must acknowledge the significant differences in risk levels and support users in reducing harm. Furthermore, as knowledge advances, these policies should be continuously updated to reflect new insights.
- 3. health literacy (education):** Educating both health professionals and smokers plays a crucial role in enhancing the effectiveness of tobacco control efforts, directly impacting public health. For health professionals, it is essential to offer specialized training seminars, practical counseling training, online courses, and information on pharmaceutical preparations as well as new nicotine delivery devices. These professionals are in a position to intervene proactively and bolster smokers' determination to quit. Well-trained professionals can significantly increase the success of cessation interventions by reducing the likelihood of relapse. At the same time, smokers also need to be equipped with the necessary tools and support to quit smoking. This can be achieved through counseling services, mobile cessation programs, public information campaigns, and educational materials such as brochures, videos, and leaflets. Such resources further enhance the overall effectiveness of tobacco control efforts.
- 4. network & collaboration:** Cigarette smoking is a global challenge affecting 1.3 billion people, resulting in 8 million deaths each year from smoking-related diseases. Sharing experiences and best practices between countries can lead to the implementation of modern, comprehensive, and effective public health strategies to combat smoking. To be realistic and successful, these strategies must include all three levels of prevention: health education, secondary prevention (social and fiscal policy, screening), and tertiary prevention (limiting disease complications, harm reduction, and improving patients' quality of life). The case of Sweden—where only about 5% of the population smokes—serves as epidemiological proof that an effective public health strategy can be implemented. International collaboration among experts, using platforms like SCOHRE, should aim to create a unified, strong stance that promotes a shift in the WHO's approach to a more pragmatic one, grounded in emerging scientific evidence.
- 5. prevention:** Preventing the initiation of smoking and reducing exposure to smoke are central to combating the smoking epidemic. Evidence shows that prevention can take the form of policy-level measures, such as increasing tobacco product taxation; enforcing stricter regulations on who can purchase tobacco; controlling where and how these products can be sold and used; and imposing advertising restrictions alongside mandatory health warnings on packaging. Prevention efforts must also occur at home, in schools, and within communities. While educating about health risks alone has not proven effective, successful evidence-based interventions focus on reducing or delaying the initiation of smoking and other substance abuse. These interventions work by addressing vulnerability factors and reinforcing protective factors against risky and addictive behaviors, particularly to protect youth. Strategies include reducing exposure to family smoking, educating about peer influence, addressing domestic violence, targeting lower socioeconomic areas or those with a high density of tobacco outlets, supporting

participation in team sports, and encouraging cultural and creative activities that promote self-esteem and assertiveness.

6. robust regulatory framework (legislation) to ensure fairness: There is a vast differential in both risks and addictiveness of nicotine delivery systems, largely determined by whether consumers are inhaling smoke. Regulations should thus treat nicotine products in a risk-proportionate way, tax laws should be similarly geared to risk, and there should be significant regulatory efforts to empower consumers to make informed decisions. Regulations should also be updated regularly to reflect the emergence of new and changed products and current scientific knowledge, and these laws should robustly defend consumers from misinformation.

7. evidence-based policy, unobstructed research & transparency in scientific data: Designing an evidence-based and transparent smoking cessation policy is essential to protecting public health, effectively addressing nicotine dependence, and reducing the harmful consequences of smoking. A health system that invests in scientific knowledge while ensuring impartial and unbiased research will be more effective and equitable. Evidence-based policy provides a solid framework for both prevention and treatment. Furthermore, a health system that actively promotes and integrates new scientific findings guarantees that smokers receive the highest standard of care. Our efforts are focused on informing all stakeholders about existing evidence, encouraging new research, and generating further evidence on Tobacco Harm Reduction and its potential to mitigate the detrimental effects of smoking. Establishing a global network of experts will help produce robust evidence that can drive health policies and regulations rooted in science rather than emotion or dogma.

8. smoking cessation is the steppingstone to fight smoking: Smoking cessation is the most critical and effective intervention in the broader strategy to prevent and reduce smoking-related morbidity and mortality. When evaluating the impact of tobacco dependence, few other conditions present such a severe combination of lethality, prevalence, and neglect, despite the availability of effective interventions. The ongoing devastation and immense costs caused by global tobacco addiction make tobacco control and smoking cessation urgent public health priorities. Smoking cessation is arguably the most powerful and cost-effective intervention for the primary and secondary prevention of smoking-related disease, disability, and death. To effectively address the tobacco pandemic, we must end years of neglect by adopting best practices and implementing systematic approaches to identifying and treating smokers. By prioritizing cessation efforts, healthcare providers can significantly reduce the long-term health impacts of tobacco use.

9. differential taxation to drive behavioural change: Reducing the prevalence of cigarette smoking should be pursued through multiple parallel strategies. One of the most effective methods is health-promoting fiscal policy, which involves taxing tobacco and nicotine-containing products based on the principle of 'less harm, less tax.' The assessment of harmfulness should include data on the content and amount of toxic substances released, and this information should be evaluated and made public by a designated state authority using marketing authorization documents for cigarettes and other nicotine products. Additionally, a continuously updated analysis of the actual clinical harm—such as symptoms and disease development—should be maintained. This approach would restrict access to all products in this category, with a particular focus on those with the highest toxicity. Ultimately, this would lead to reduced consumption, which is likely to result in lower health losses for society.

10. tobacco harm reduction a mainstream strategy for public health protection: Smoking policies have traditionally focused on prevention and cessation, but recent data show they have not sufficiently reduced smoking rates in many countries. While essential, these strategies alone do not address the needs of those unable to quit. Tobacco Harm Reduction (THR) offers scientifically backed, lower-risk alternatives to cigarettes that can significantly reduce the health burden of smoking. Products like vaping devices, nicotine pouches, snus, and heated tobacco can replace cigarettes and improve health outcomes for those who switch. Sweden, with a smoking prevalence of just 5%, is a successful example of a THR-focused strategy using snus. Given the global toll of smoking-related diseases, THR is a pragmatic approach that recognizes nicotine addiction and the varying risks of tobacco products. Countries like the UK, New Zealand, and Sweden are already seeing positive results by incorporating THR into their anti-smoking efforts. We advocate for THR to become one of the mainstream public health strategies.

SCOHRE ACTIVITY – 8th SUMMIT ON TOBACCO HARM REDUCTION



SCOHRE acknowledges the need to step up the efforts towards a new broader approach to smoking control policies.

During the 8th Summit on Tobacco Harm Reduction, organized in Athens (September 30 and October 1, 2025), 200 Tobacco Harm Reduction advocates from 51 countries discussed strategies to implement harm reduction as a valuable public health strategy for smokers who cannot or will not quit. As underlined across all sessions *“While cessation remains the gold standard, alternatives such as e-cigarettes, heated tobacco, and oral nicotine products represent a pragmatic, science-based option.”*

At the closing session **“Uniting Perspectives for Tobacco Harm Reduction”**, it was highlighted the growing international debate on the role of harm reduction in tobacco control strategies and efforts to reach consensus. Leading experts and advocates committed to reshaping the global fight against smoking participated in the panel discussion.

Despite increasing scientific evidence that alternative nicotine products (such as vaping, nicotine pouches, and heated tobacco products) can benefit smokers who switch from traditional cigarettes, acceptance remains limited. Only a few countries, such as the UK and New Zealand, have adopted such strategies, while resistance continues—fueled by the uncompromising stance of the World Health Organization (WHO).

Professor Ignatios Ikonmidis, President of SCOHRE –the International Association of independent experts on **Smoking Control & Harm Reduction**— reaffirmed the Association’s commitment to reshaping tobacco control: *“Harm reduction must become a recognized pillar of public health policy, alongside prevention and cessation. Increasing the knowledge of healthcare professionals, regulators, policymakers, and the public is essential. The evidence is undeniable: switching from cigarettes to less harmful nicotine products can save lives. Yet, misconceptions, resistance, and misinformation continue to hold back progress. Science, not ideology, must guide policy, and collaboration is essential — across countries, professions, and communities. Together, with partners and stakeholders, we are building momentum for a smoke-free world,”* he concluded.

***Countries represented at the 8th Summit:**

Albania, Argentina, Armenia, Austria, Belarus, Belgium, Bhutan, Botswana, Bulgaria, Brazil, Canada, Croatia, Cyprus, Czech Republic, Estonia, Finland, France, Greece, Hong Kong, Hungary, India, Ireland, Israel, Italy, Japan, Kazakhstan, Kenya, Kuwait, Lithuania, Malaysia, Mexico, Morocco, Rep. of North Macedonia, Pakistan, Philippines, Poland, Portugal, Romania, Russian Federation, Serbia, Singapore, Slovakia, South Africa, South Korea, Spain, Sweden, Switzerland, The Netherlands, Tunisia, UAE, United Kingdom, U.S.A., Uzbekistan.