

Attention of:

Commissioner for Health and Animal Welfare, Mr. Olivér Várhelyi

SCOHRE

(International Association on Smoking Control & Harm Reduction)

**Subject: Ensuring that the revision of the EU Tobacco Regulatory Framework
remains evidence-based**

12th October 2026

Your Excellency,

We are addressing you based on the recent joint letter that was sent to you by the Health Ministers of the Netherlands, Belgium, Finland, France, Hungary, Latvia, Slovenia and Spain concerning the forthcoming revision of the EU Tobacco Products Directive (TPD) and the EU Tobacco Advertising Directive (TAD).

SCOHRE, as a scientific association committed to advancing evidence-based public health policy, shares the objective of reducing the burden of smoking-related disease and preventing youth initiation. These goals should remain central to the European Union's tobacco control strategy.

At the same time, we believe that regulatory decisions should be proportionate, scientifically justified, and informed by the growing body of evidence on the continuum of risk across nicotine-containing products.

In particular, proposals that would impose a blanket freeze on future product categories raise important scientific concerns. Public health policies should allow innovative products to be assessed on the basis of their individual characteristics, toxicological profiles, and population-level impact. Restricting products before evidence can generate risks by limiting scientific evaluation and may unintentionally discourage the development of potentially lower-risk alternatives for adults who smoke.

Similarly, the experience from several jurisdictions highlights the importance of carefully considering the unintended consequences of highly restrictive measures, including the potential expansion of unregulated or illicit markets, which can undermine both public health objectives and regulatory oversight.

Many of these issues were extensively discussed during the [9th THR Summit](#) (September 28-30, 2026 || virtual), which brought together scientists, public health experts, clinicians, and policymakers to examine the evolving evidence on smoking, nicotine use, and harm reduction. The discussions highlighted the importance of ensuring that future regulatory frameworks remain responsive to emerging scientific evidence and new technologies, while maintaining a strong focus on public health

objectives. We would respectfully encourage consideration of the key scientific perspectives reflected in the Summit's discussions and accompanying [public materials](#).

As the European Union prepares the next generation of tobacco and nicotine regulation, we encourage policymakers to ensure that scientific evidence remains the primary basis for decision-making. Effective regulation should protect youth, support smoking cessation, address emerging risks, and remain adaptable to future scientific developments.

We respectfully call for a transparent, evidence-based review process, covering all evidence, that evaluates the risks, the benefits, and the population-level impact of individual products and policy measures on their merits.

Yours faithfully,

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