



Agir et dialoguer pour la réduction des risques

**SOVAPE contribution for European Commission webinar
“Emerging tobacco and nicotine products in tobacco control policies”**

10th February 2022

Hello, I am Nathalie Dunand, chair of SOVAPE, a non profit association, member of ETHRA, we have no links with Tobacco nor Pharma industry.

Thank you for inviting us to this meeting, even if we do not fully understand its objectives. The decisions to tax vaping and ban flavours seem to have been already taken without evaluating the impact nor taking into account users recommendations.

As an association advocating tobacco harm reduction, SOVAPE has made its point of view known at every opportunity during the consultations organised by the Commission. SOVAPE has developed detailed and documented arguments never taken into account. Clearly, the commission is ruling out a harm reduction policy a priori. A position we regret.

Our association is made up of former smokers who, like many others, were able to quit smoking thanks to vape. We were enthusiastic about the ease of quitting smoking with this product and wanted to share with others the hope and liberation of giving up smoking cigarettes. A massive surge of support emerged for using vape to quit smoking. This spontaneous movement spread without the support of health authorities.

Our enthusiasm was quickly dampened.

We went from disappointment to disappointment as the positions in Tobacco Control gradually emerged.

Starting with the WHO. As early as 2012, WHO set the tone by advocating a ban on electronic cigarettes, a product that brings hope to smokers and is capable of creating a dynamic of

mutual support. WHO has sided with the prohibitionists, using preconceived ideas and junk science that harm smokers, instead of help them.

This hard line was followed by the European Commission in 2013, when they proposed a medical regulation only, later refused by The European Parliament.

In 2014 we saw the discussion and adoption of TPD2, which renewed the ban on SNUS - except in Sweden. Sweden has the far lowest smoking rate in the EU - though not the lowest rate of tobacco users. However, Sweden has the lowest rate of smoking-related cancers in men!

Snus in Sweden demonstrates the effectiveness of public adoption of a harm reduction solution.

Regarding vaping, some provisions of the TPD are positive for consumer protection. Others, apart from having no interest in terms of public health, cause an overconsumption of plastic, increase costs and lead to circumvention practices. For example the 10ml bottle limit, the 2ml tank limit, the absence of devices with more than 20mg/ml of nicotine.

The benefits of vaping and the conditions for the effectiveness of the device are ignored, as shown by the SCHEER report, commissioned to **assess only absolute risks**. This political approach is based on an a priori doctrine, a systematic rejection of harm reduction, with the only regulatory response being bans and taxation.

The predictable decisions announced at the INCa European meeting last week will bury legal vaping as a smoking harm reduction tool. The huge disappointment of the public, which we echo here, undermines confidence in their health authorities and in the EU. Currently, harm reduction approaches in New Zealand and the UK with vape or Norway and Sweden with SNUS are public health success stories. It is unfortunate that the European Commission has decided a priori to ignore them.

For those among you curious to understand how to make vape efficient against smoking, take a look at the ETHRA survey we coordinated on its website <https://ethra.co/eu-survey>