

European Healthcare Students' Associations Alliance statement regarding Tobacco Products and Advertising Directives

The European Healthcare Students' Associations Alliance (EHSA), comprising the European Medical Students' Association (EMSA), the European Pharmaceutical Students' Association (EPSA), the European Dental Students' Association (EDSA), and the European Federation of Psychology Students' Associations (EFPsA), is an independent collaboration representing over 750,000 healthcare students from across Europe. Our organisations are non-profit, non-governmental, and student-led, united by a shared commitment to advancing public health and strengthening the voice of future healthcare professionals in Europe. As organisations funded by our members, we operate independently and are free from any commercial or industry influence.

The upcoming Tobacco Products Directive (TPD) and Tobacco Advertising Directive (TAD) revision marks the first comprehensive revision of the European Union's tobacco control framework in over a decade. It represents a unique opportunity to protect young people and strengthen public health for current and future generations. The tobacco epidemic, driven by decades of tobacco industry interference has placed an enormous burden on individuals, families, healthcare systems, the environment and society. The decisions made during this revision could save countless lives.

Considering that:

1. Tobacco remains one of the **leading preventable causes of death** and disease in the WHO European Region, causing one in five deaths due to non-communicable diseases totaling 1.1 million deceased every year. (1-3)
2. Tobacco causes **cardiovascular diseases, pulmonary diseases, cancer, oral diseases, addiction, infections** among others. (2)
3. **Europe continues to have the highest prevalence of tobacco** use among all WHO regions, with particularly concerning rates among adolescents. (3)
4. The tobacco industry has been found to engage in **tactics specifically targeting youth** such as marketing products near schools, on gaming platforms, on social media using influencer endorsements, displaying tobacco at children's eye-level near sweets and at sponsoring and youth-oriented events. (4)

5. The **TPD and TAD do not address novel products** such as e-cigarettes, heated tobacco products and nicotine pouches, some of which have become more popular than cigarettes among youth. They also **do not adequately regulate modern forms of marketing**, including influencer marketing, sponsorships and online advertising (2, 4, 5)
6. **New products come with new health risks**, e.g., e-cigarette or vaping-associated lung injury (EVALI) which can cause severe respiratory failure, addiction, cancer, brain developmental issues among others. (4)
7. Attraction drivers such as **inviting packaging and child-friendly flavouring is a primary reason behind the appeal** of tobacco and nicotine products, especially to children and adolescents. (6-7)
8. The current EU legislative framework has **limited Member States' ability to introduce further tobacco control measures**, such as generational tobacco bans proposed in countries including Ireland and Denmark. (8-9)
9. In the WHO European Region, 32% of 15-year-olds report having used an e-cigarette at least once and 20% report use within the past 30 days. Despite often being presented as smoking cessation tools, **e-cigarettes are increasingly attracting young people** who have never previously smoked, contributing to nicotine dependence and future tobacco use. (3-4)
10. Tobacco products **pollute the environment** throughout their whole production and consumption chain, with cigarette butts for example being one of the most littered items on earth, with 4.5 trillion being disposed of in the environment each year despite being toxic. Furthermore, the treatment of tobacco-related diseases requires healthcare resources and generates medical waste, adding to the environmental footprint of tobacco use. (10-11)
11. Despite Article 5.3 of the WHO Framework Convention on Tobacco Control (FCTC), the **tobacco industry continues to influence EU policymaking** - the tobacco industry spends nearly €14 million annually on EU-lobbying and held 257 meetings with the European Parliament between 2023 and 2025. (12)

The European Healthcare Students' Associations Alliance calls for:

1. **Comprehensive Regulation:** Extend definitions in the EU tobacco legislation to cover all tobacco and nicotine products, including emerging products like nicotine pouches and electronic non-nicotine delivery systems, with a mandatory pre-market authorisation system.
2. **Removal of attraction drivers.** Prohibit characterising flavours and other product features designed to increase appeal, introduce mandatory plain packaging and product designs across all tobacco and nicotine products, and require large health warnings including pictures and text to cover 80% of packaging.
3. **Stronger regulation of digital marketing.** Establish a EU-wide framework for digital tobacco control, with a platform-neutral ban on Tobacco Advertising, Promotion and Sponsorship covering social media, influencers, branded content, affiliate marketing, corporate social responsibility (CSR) activities used for promotional purposes, and cross-border online advertising. This should be done while ensuring effective cross-border enforcement mechanisms.
4. **Avoid incentivising harmful products:** Policy should be grounded in independent evidence on the relative harms of tobacco and nicotine products. As such, the regulatory framework must avoid creating incentives that drive users toward more harmful products, while ensuring novel nicotine products do not serve as entry points for non-users.
5. **Letting member states go further.** Revise Article 24 of the TPD to explicitly allow Member States to introduce generational sales prohibitions alongside product category bans. Member States should also be able to justify restrictions or prohibitions on the basis of environmental protection, including measures targeting environmentally harmful product components such as cigarette filters, disposable vapes and batteries.
6. **Environmental protection:** The TPD should aim to reduce environmental pollution by tobacco and nicotine product waste, including a ban on all disposable tobacco and nicotine devices, as well as measures targeting batteries and cigarette filters.
7. **Implementing the FCTC.** The EU should implement the WHO FCTC in full. This includes article 5.3 to ensure that tobacco industry influence over policymaking is effectively limited within the EU.

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