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Contribution regarding Notification 2020/0228/DK: Bill amending the Act on the ban on tobacco advertising etc., Act on tobacco products etc., Act on electronic cigarettes etc. and various other acts (Implementation of the national action plan against smoking by children and young people)

In December 2019, the Danish Government and a broad political coalition in the Danish Parliament agreed to implement a national action plan with a wide range of initiatives against smoking among children and young people. We, the undersigned organizations, applaud the proposal for implementing the ambitious and strong tobacco control measures in Denmark outlined in the bill.

We find that the public health perspective and the focus on preventing smoking among young people largely has been absent from the current stakeholder contributions to the notification of the proposal. We therefore want to express our full support for the bill and its aim to reduce smoking among young people and to decrease inequalities in health.

Every year, 13,000 Danes die prematurely because of tobacco. Smoking is the main cause of lung cancer, at least 15 other types of cancers, cardiovascular disease, COPD and a wide range of other severe diseases. Smoking rates among children and young people in Denmark are high: Almost one out of three 16-24 year-olds smoke. At the same time, new tobacco and non-medical nicotine products have become increasingly popular among the Danish youth.

Support for the Danish action plan

The Danish Government supports the national vision of a smoke-free generation by 2030. But no single political initiative alone can make us reach this goal. It is necessary to implement all of the proposed initiatives in a comprehensive action plan that protects Danish children and adolescents from smoking. This includes plain packaging of tobacco products and e-cigarettes, point of sales display ban, and a ban on characterizing flavours in tobacco products and e-cigarettes.

The proposed Danish tobacco control plan aims to achieve a high level of public health protection in line with Denmark's obligations under the Framework Convention on Tobacco Control. We urge the Commission and member states to support the comprehensive Danish action plan against smoking among children and adolescents, in particular within the areas complementary to the EU Tobacco Products Directive (TPD).

Allow for ambitious tobacco control in EU member states

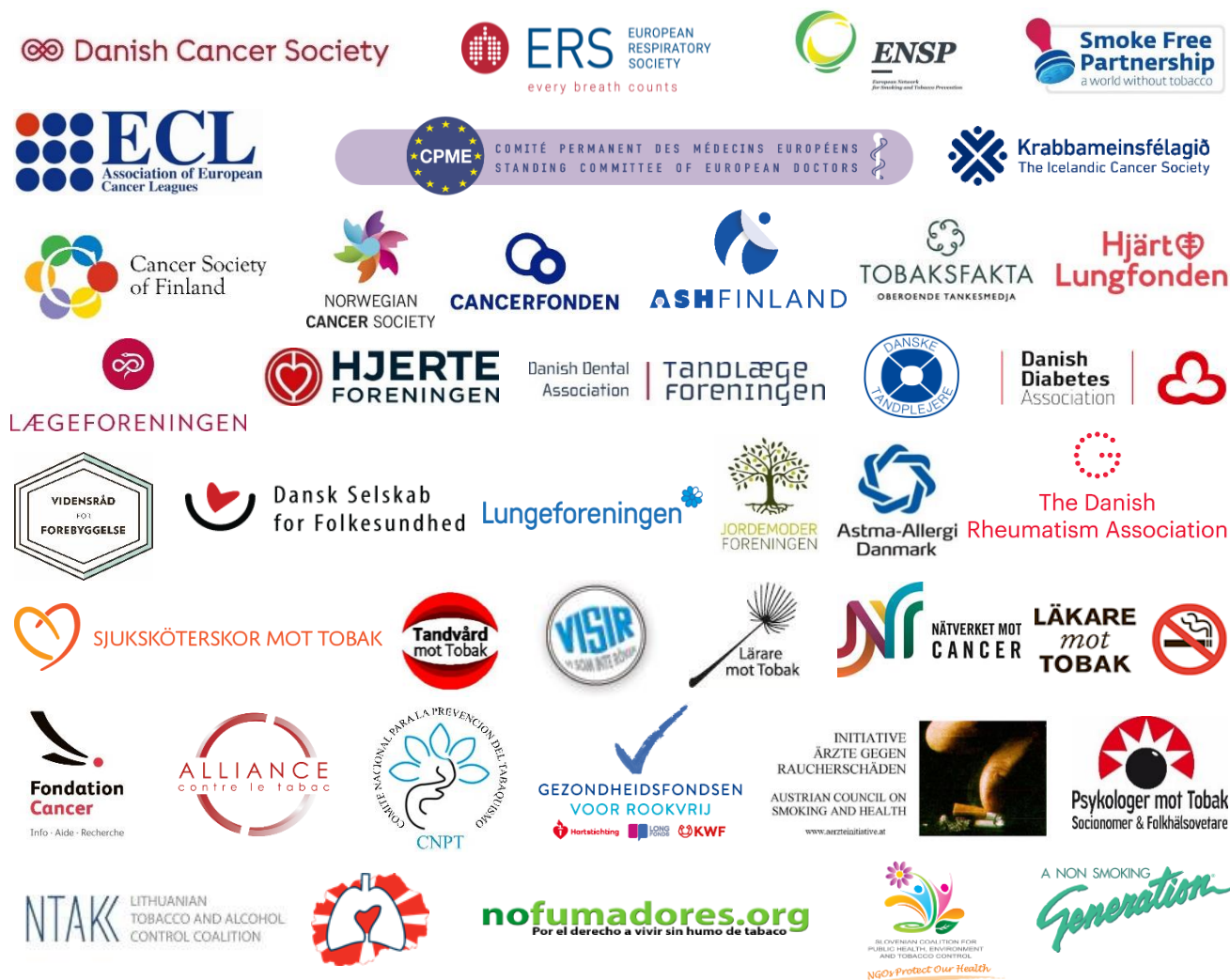
In the European Union, tobacco remains the single largest avoidable health risk, responsible for nearly 700,000 deaths every year. EU and Denmark are parties to the WHO Framework Convention on Tobacco Control and are as such obliged to protect present and future generations from the devastating consequences of tobacco.

It is therefore imperative that the Commission and the TPD advance European tobacco control rather than block ambitious tobacco control policies initiated by individual member states.

We strongly recommend that in the coming revision of the TPD the Commission reinforce Article 24 (2) that allows member states to go beyond the directive in order to protect public health. This is in accordance with the Treaty on the Functioning of the EU that requires the EU and member states to take into account a high level of protection of human health (Articles 9 and 36). It should for instance be possible for member states to apply a precautionary approach while the health effects associated with new tobacco and non-medical nicotine products are being explored. This would allow member states to adapt national legislation that reflects their public health situation and priorities and to regulate the cascade of new tobacco and nicotine products that have recently flooded the European market and reached our children and adolescents.

We encourage the Commission to support the Danish proposal and to continue to allow the TPD to pave the way for further ambitious European tobacco control policies that protect the health of present and future generations.

Best regards,



Danish Cancer Society, European Respiratory Society, European Network for Smoking and Tobacco Prevention, Smoke Free Partnership, Association of European Cancer Leagues, Standing Committee of European Doctors, The Icelandic Cancer Society, Cancer Society of Finland, Norwegian Cancer Society, Cancerfonden, ASH Finland, Tobaksfakta, Swedish Heart-Lung Foundation, Danish Medical Association, Danish Dental Association, Danish Dental Hygienists, Danish Diabetes Association, Danish Scientific Council on Prevention, Danish Society of Public Health, Danish Lung Association, Danish Midwives Association, Asthma-Allergy Denmark, The Danish Rheumatism Association, The Swedish Nurses against Tobacco, Dentists against Tobacco, VISIR, Teachers against Tobacco, Network against Cancer, Doctors against Tobacco, Luxembourg Cancer Foundation, The French alliance against tobacco, National Committee for Tobacco Prevention, Health Funds for a Smokefree Netherlands, Austrian Council on Smoking and Health, Psychologists against Tobacco, Lithuanian Tobacco and Alcohol Control Coalition, The Macedonian Respiratory Society, Nonsmokers.org Spain, Slovenian Coalition for Public Health, A Non Smoking Generation