

mag. TAMARA KOZLOVIČ
Republic of Slovenia, Committee on Health
Chair of the Committee on Health
gp@dz-rs.si

Madrid, March 7th, 2024

Letter of Support regarding the proposed changes to the Slovenian tobacco legislation

Dear Mrs. Kozlovič,

"In Slovenia, tobacco is the leading preventable risk factor for premature death and lost healthy years of life. In the period 2017–2019, an average of 3,123 inhabitants died annually in Slovenia from diseases attributed to smoking, which means almost 9 deaths per day, or 60 every week." (Source: Strategy for Reducing the Consequences of Tobacco Use for Slovenia Without Tobacco 2022–2030, No: 00700-2/2022/4, 12. 5. 2022).

"The costs of treatment, reduction of productivity, and premature mortality due to tobacco use amount to 1,800,000,000 EUR annually." (Source: Slovenija brez tobaka – Kdaj? (Slovenia Without Tobacco – When?), Slovenian National Institute of Public Health, 2015).

In February 2023, the proposal of the Act on Amendments to the Restriction of the Use of Tobacco Products Act (in accordance with the Commission Delegated Directive (EU) 2022/2100) was submitted into public consultation until the 30th of March 2023. The proposal also includes: a ban on all flavours in electronic cigarettes, with the exception of some tobacco flavours; a ban on characteristic flavours for heated tobacco products and the introduction of health warnings on their packaging; a ban on adding additives in electronic cigarettes without nicotine; a ban on smoking rooms with a transition period of five years; inclusion of definitions of new nicotine products in the existing legislation; a ban on internet and cross-border distance selling; and a more effective control over the implementation of the Restriction of the Use of Tobacco Products Act.

Slovenian government approved the proposed amendment in November 2023. However, the approved amendment does not include the ban of the menthol flavour in electronic cigarettes. However a recently published review and meta-analysis of the effects of menthol bans around the world, [The Impact of Menthol Cigarette Bans: A Systematic Review and Meta-Analysis](#), shows that the benefits of a national ban would be even bigger than estimated. In particular, they found that **24% of menthol cigarette smokers quit smoking after menthol was banned**. Therefore, we strongly support the ban of menthol flavour in electronic cigarettes

The amendment also includes a ban on smoking rooms with a transitional period of five years. At Nofumadores we consider that five years is too long a period during which Slovenian society will

continue to be exposed to passive smoking, which is why our organization strongly supports the position of the Slovenian Community for Tobacco Control and Health in requesting the shortening of the transition period on a ban on smoking rooms to one year instead of five and we encourage the Slovenian Government to adopt the recommendation.

Tobacco industry heavily promotes tobacco and tobacco-related products among children and adolescents. The use of electronic cigarettes (vapes), heated tobacco products, nicotine pouches (white snus) and smokeless tobacco products (snus, chewing tobacco) is increasing among adolescents in Slovenia. Electronic cigarettes are used by 10 % of 15-year-olds. (Source: Pregled najnovejših podatkov o uporabi tobačnih in povezanih izdelkov v Sloveniji (Review of the latest data on the use of tobacco and tobacco related products Slovenia), Slovenian National Institute of Public Health, 2021).

By adopting the proposed changes to the tobacco legislation, Slovenia would significantly contribute to the goals of the Strategy for Reducing the Consequences of Tobacco Use for Slovenia Without Tobacco 2022–2030 and move closer to the national goal of “Slovenia without Tobacco 2040”.

Slovenia should be among many successful European countries, which have already made the legislation changes in accordance with the Commission Delegated Directive (EU) 2022/2100.

Due to this, **we strongly support the ban of menthol flavour in electronic cigarettes and the shortening of the transition period on a ban on smoking rooms to one year instead of five.**

Best regards,

Raquel Fernandez Megina
President of Nofumadores.org

Nofumadores.org is an independent non-for-profit, non-political, and non-denominational association, registered in the Spanish National Registry of Associations with number 172,478. Nofumadores.org's main objective is to defend the right to live without tobacco smoke or vapors, monitor compliance with current legislation on this matter, as well as promote the advancement of legislation on tobacco control and prevention of smoking. Nofumadores.org is a member of ENSP (European Network for Smoking and Tobacco Prevention) and a collaborating member of the National Committee for the Prevention of Smoking (CNPT). **Winner of the World No Tobacco Day 2022 Award granted by the WHO.**