



Ministry of Health, Welfare and Sport

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Ms Stella Kyriakides, Commissioner for Health  
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International Affairs

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Date **- 2 MAART 2020**  
Subject Tobacco control

**Our reference**

1651638-202230-IZ

**Your reference**

*All correspondence addressed  
to the postal address quoting  
date and reference of this  
letter.*

Dear Commissioner Kyriakides,

On behalf of the Ministers and State Secretaries mentioned below, I would kindly ask your attention for a specific aspect of the broader topic of tobacco control: product regulation, more specifically measurement methods for tar, nicotine and carbon monoxide (TNCO) in cigarette smoke.

We have taken note of the Mission letter you have received from the President of the European Commission, Ursula von der Leyen. The Mission letter touches on several health-related issues. On the last page, it is mentioned that 'the mission outlined above is not exhaustive or prescriptive'. In this regard, we observe that tobacco control is not listed as a separate item in your Mission letter. Nevertheless, we strongly hope that you will continue and further strengthen EU efforts to reduce tobacco consumption, which is a major risk factor for cancer, as well as other non-communicable diseases.

This letter focuses on a specific aspect of EU tobacco control legislation: the Tobacco Products Directive (TPD) stipulates maximum emission levels from (carcinogenic) tar, nicotine and carbon monoxide (TNCO) in cigarette smoke. For the measurement of these emissions the TPD prescribes the use of specific ISO measurement methods, which are developed by the tobacco industry.

Research shows that when using the independent Intense method, considerably higher quantities of TNCO are being measured than with measurements based on the ISO methods. More importantly, when using the Intense method nearly all TNCO levels measured exceed the allowed maximum TNCO levels, as laid down in the TPD, to a significant degree. The conclusion is that cigarette manufacturers can only comply with the legal upper limits for TNCO emissions by using measurement methods of their own making. So-called filter ventilation is a crucially important element in this story. By blocking the ventilation holes in the filter, which smokers do, the Intense method measures much higher TNCO emissions than the ISO methods. The latter do not block the ventilation holes, which clearly gives a distorted picture of reality. For more information, please access: <https://www.rivm.nl/en/tobacco/filter-ventilation>.



While it is true that there are no perfect measurement methods for TNCO in cigarette smoke, the independent Intense method, as recommended by WHO and developed by WHO TobLabNet, reflects human smoking behavior much better than the ISO measurement. We therefore call for replacing the ISO method by the Intense method in the TPD. We simply cannot leave crucial aspects of tobacco product regulation, such as the measurement of toxic emissions from these products, to the tobacco industry. According to the TPD the Commission may adopt delegated acts to the measurement methods and we hope you will look into this issue as soon as possible.

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The focus on measurement methods for TNCO in this letter does not call into question that in the process of drafting the first report on the application of the TPD, and in the subsequent process of revising the Directive, attention should be paid to other aspects of tobacco product regulation as well.

We thank you in advance for considering our request.

Yours sincerely,

~~Paul~~ Blokhuys  
State Secretary for Health, Welfare and Sport

Also on behalf of the following Ministers and State Secretaries, responsible for Health, listed in alphabetical order of the countries they represent:

Denmark

Minister Magnus Heunicke

Estonia

Minister Tanel Kiik

Finland

State Secretary Eila Mäkipää

Iceland

State Secretary Ásta Valdimarsdóttir

Ireland

Minister Simon Harris

Latvia

State Secretary Daina Mūrmane-Umbraško

Lithuania

Minister Aurelijus Veryga



Luxembourg  
Minister Paulette Lenert

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Norway  
Minister Bent Høie

Portugal  
Minister Marta Temido

Slovenia  
Minister Aleš Šabeder

Sweden  
Minister Lena Hallengren