

Tobacco Europe

UNITAB congress

24 September 2025



Agenda

1. Presentation of Tobacco Europe & 2025 priorities
2. Updates on the revision of the Tobacco Products Directive
3. The European Commission's Cardiovascular Health Plan
4. Single-Use Plastics Directive review – updates
5. External activities

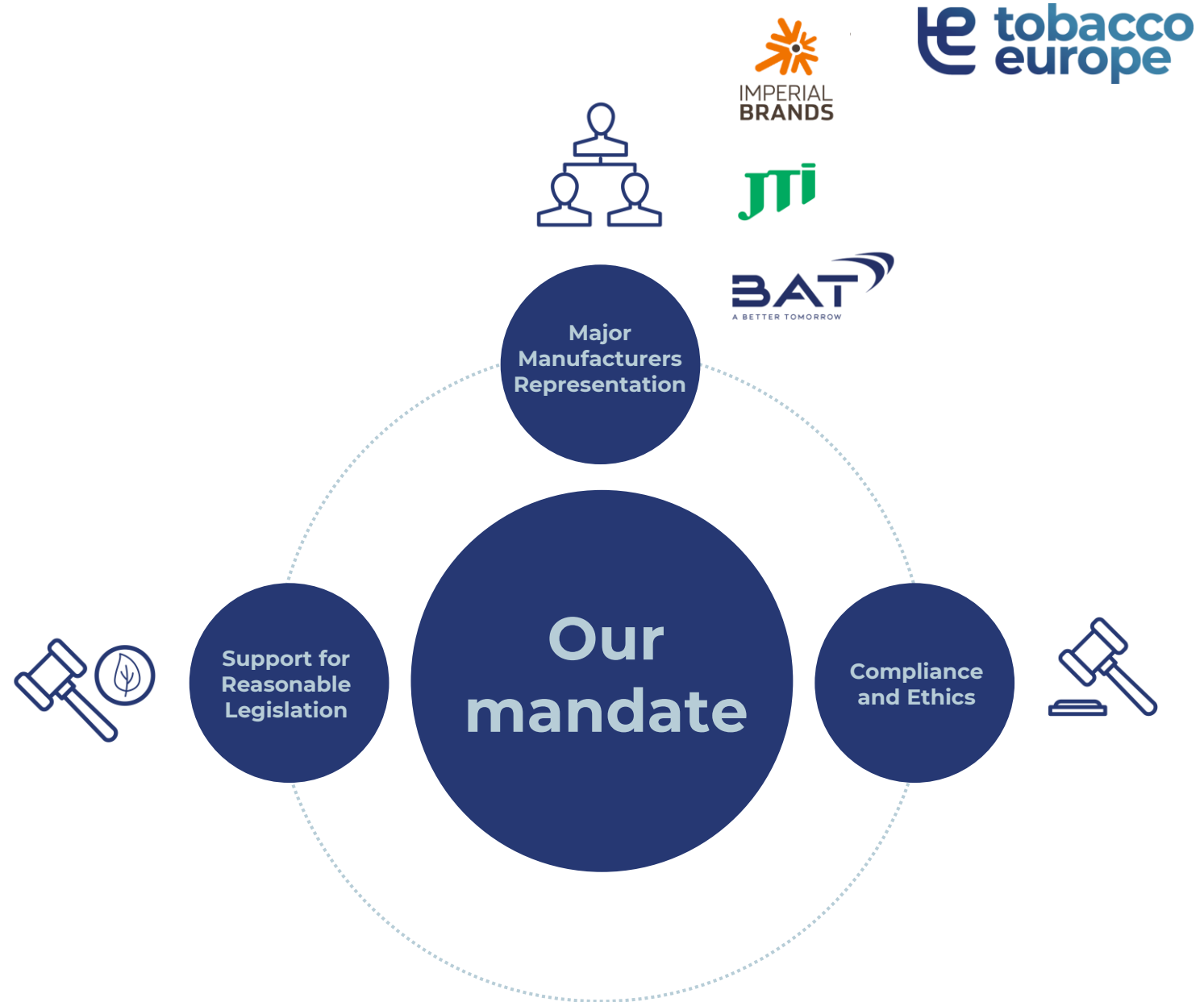
Who are we?

Tobacco Europe AISBL – European Association representing the major European-based tobacco and nicotine products manufacturers.

What do we do?

Tobacco Europe brings added value to its members on several aspects:

- Monitoring and Information Gathering
- Engagement with EU Institutions and act as one voice
- Coordination with the value chain, NMAs & Third-Parties

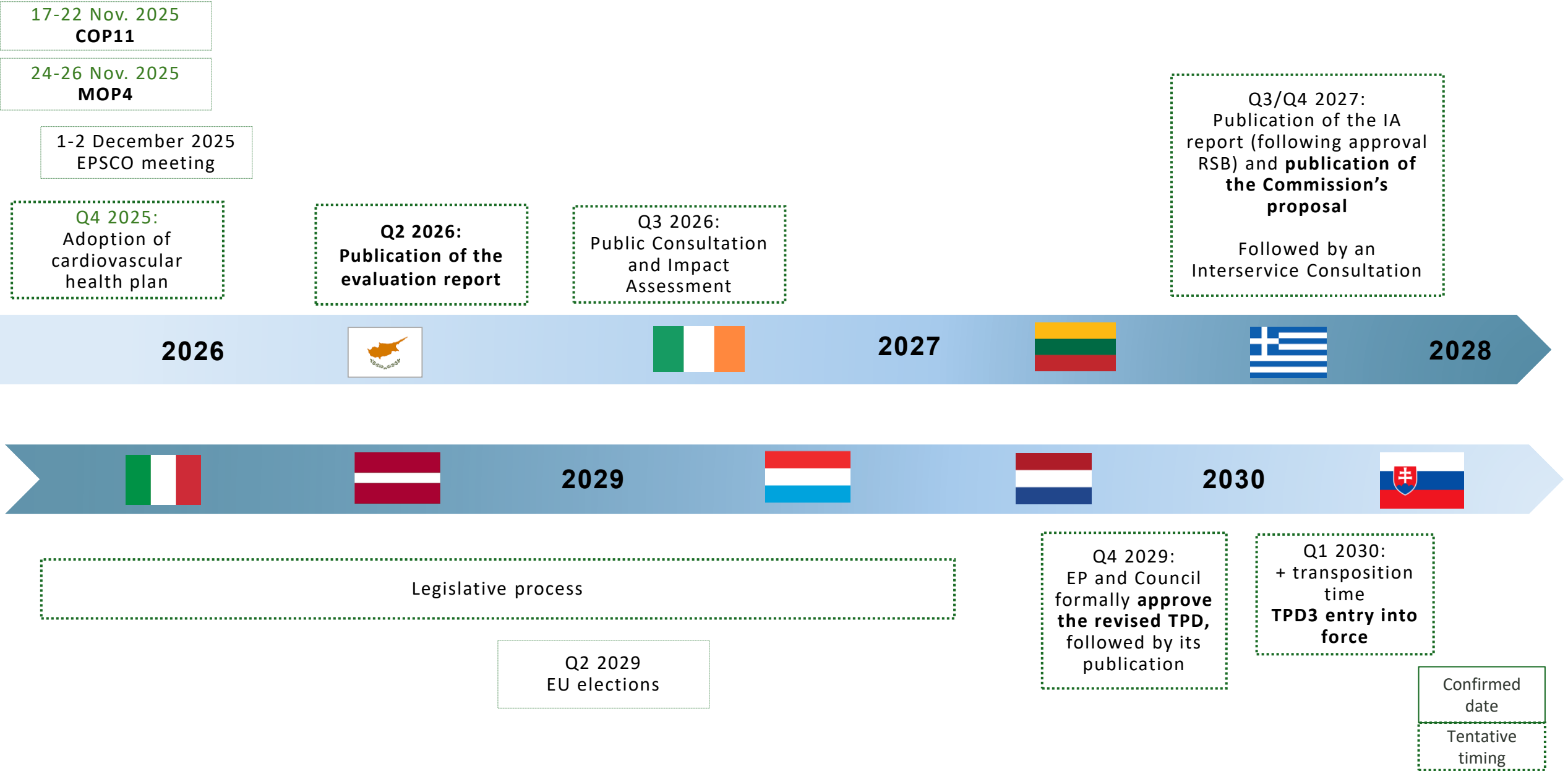


2025 priorities

Tobacco Europe's key priorities primarily focus on

1. Tobacco Excise Directive (TED) – Review
2. Review of the Tobacco Product Directive (TPD) & Tobacco Advertising Directive
3. Single-Use Plastics Directive: Implementation EPR schemes and upcoming review in 2027
4. Environmental and Sustainability files: implementation of adopted files and preparation of upcoming new initiatives
5. Monitoring of new products' evolving legislative landscape, eg Nicotine Pouches

TOBACCO PRODUCTS DIRECTIVE 2 REVISION – TENTATIVE TIMELINE



What to expect from the TPD Impact Assessment?

The publication of the evaluation related to TPD2 is expected for Q2 2026.

Based on the Impact Assessment (IA) of the Tobacco Excise Directive, shortcomings to the TPD III IA are to be expected:

- **Overstated public health gains:** The IA may assume unrealistically high reductions in smoking prevalence and health benefits from regulatory measures (e.g. larger health warnings, plain packaging, flavour bans), while evidence from MS with similar measures often shows a much smaller behavioural impact.
- **Downplaying of illicit trade risks:** as seen in the TED IA, illicit channels might be disregarded
- **Dismissal of employment and regional impacts:** Similar to the TED IA, the TPD assessment may downplay sector-specific job losses as “marginal” at the EU level.
- **Insufficient recognition of harm reduction:** The IA may not properly evaluate the role of reduced-risk alternatives, resulting in restrictions similar than of traditional products.

Quotes found in Impact Assessment on TED



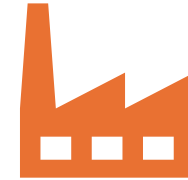
Impact on growers minimised!

*“it is reasonable to assume that a reduction in demand for tobacco will have an impact on EU tobacco growers (...) less than 4% of the worldwide annual tobacco crop is grown in the EU. The number of EU growers in 2024 can be estimated at about 14 500-15 000 (...) Their number has **constantly declined** in the past decade from an estimated 60 000 in 2010 (...) The largest number is found in Bulgaria (approximately 6 200), followed by Greece (4 600) and Poland (3 500)”*



Impact on SMEs in the TVC neglected as “limited sectors”

*“would especially affect the SME component of the e-cigarette sector) (...) “and to **a much lesser extent**, in the raw tobacco sector, and in limited subsectors (e.g. cigars, pipe tobacco, smokeless tobacco”*



Competitiveness: Processors and wholesalers not considered:

“First processing is carried out by around 30 enterprises (...) Second processing is even more concentrated (...) In 2022 there were almost 2 000 enterprises involved in wholesaling of tobacco products.”

Other elements to be considered



Regulatory Scrutiny Board calling for the impact on regions to be better examined



“The analysis should also include a territorial impact analysis, since tobacco producers seem to be concentrated in a limited number of geographic clusters. Given this concentration, the report should assess potential labour and social impacts for the regions concerned.”



Employment footprint of the industry dismissed



*“**no official statistics** on jobs linked to tobacco” (...) “there is **no data** on the associated employment”) as well as the effects of on jobs (“impacts on economy-wide employment would be **marginal** and concentrated in a handful of Member States”).”*

The Cardiovascular Health Plan: Status

On 20 June 2025, Health Commissioner Varhelyi announced that **this health plan would be adopted by the end of 2025.**

The European Commission has launched **a Call for Evidence**, which closed on September 15. There will be **no Public Consultation.**

- 676 contributions provided
- Top 3 types of contribution: 30% from NGOs (201), 28% from EU citizens (185), 15% are from companies and business associations (100+)

At **Council level**, Member States support focus made on tobacco, call for more actions on alcohol and food, without further details.

In parallel, **the European Parliament** is preparing the ground for an own-initiative report (INI) on this matter (as well as one on the Beating Cancer Plan).

Single-Use Plastics Directive review - updates



The Single-use plastics Directive revision process will begin this year.



As potential further measures we could expect:

Monitoring of marine litter

Annex listing single-use plastic products to be reviewed

Broader scope covering other single-use plastics



Next steps:

Call for Evidence and Public Consultation in Q4 2025

Commission adoption (of the evaluation report) in July 2027

Our external activities

 1. **Monthly newsletter** and **Quarterly external newsletter** (*available on our website, to share with your network*)

-  2. S&P Economic & Social Footprint study:
- In 2023, TE published its **economic footprint of the traditional tobacco and new nicotine products value chain to the EU-27**
 - Access to the **report** on [Tobacco Europe website](#)
 - Key findings available on the **micro-site**
 - possibility **to upload EU & national factsheets**

 3. Visit our LinkedIn page to keep up to date with **latest EU updates**



THANK YOU!

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