

Dear President of the Commission and European Commissioners:

We, the undersigned experts in public health, nicotine dependence and tobacco control, write to you out of concern over the forthcoming review of the Tobacco Excise Directive, which is expected to impose new taxes on less harmful nicotine products.

Public health policies should use the best available scientific evidence. It is, therefore, a matter of significant concern that recent EU public communications,^{1,2} claiming that non-combustible nicotine delivery products pose health risks comparable to combustible cigarettes, contradict the best available scientific evidence. This position is not only a significant departure from the foundational principle of evidence-based public health but also undermines the European Commission's vital commitments to data-driven legislation and to combatting disinformation.

Smoking remains the leading cause of preventable death in the EU, with nearly 700,000 premature deaths annually. Twenty-six percent of citizens (29% among 15–24-year-olds) still smoke.³

Extensive scientific evidence has proven that non-combustible nicotine products such as e-cigarettes, heated tobacco products and nicotine pouches are substantially less harmful than cigarettes. These products have also helped millions quit smoking.

- In Sweden, where snus and nicotine pouches are commonly used, daily tobacco use is the lowest in the EU (<5%) and cancer incidence is 41% below the EU average, despite overall nicotine use being similar to the EU average.⁴
- In the United Kingdom where the government encourages smokers to switch to vaping, smoking has fallen from 17% to 12% in five years.⁵
- In New Zealand, daily smoking dropped to 7% in 2023/24, from 16% in 2011/12, while daily vaping has risen to 11%.⁶

Regulation should be guided by science. Ideological or moral beliefs should not guide public health policies and must not override the facts and the goal to improve the health and lives of Europeans. Protection of minors is important, but it can be achieved by proper implementation of the already established regulation on advertising and sales, without hindering the public health objectives of reducing death and disease caused by smoking.

Smokers should have access to non-combustible alternatives. Fiscal and regulatory provisions that discourage the switch from smoking to less risky alternatives are unethical and protect the cigarettes trade.

Commissioners, public health in Europe stands at a crossroads: in the coming months, the European Commission intends to advance Tobacco Products Directive and the Tobacco Excise Directive. Implementing a “tax-raid” on potentially life-saving products will keep smokers smoking, will harm public health, and will set a bad paradigm for other countries (particularly LMICs) and regions globally.

Sources

1. <https://x.com/OliverVarhelyi/status/1945539807523832261>
2. <https://x.com/OliverVarhelyi/status/1945549946192577022>
3. https://health.ec.europa.eu/tobacco/overview_en
4. <https://smokefreesweden.org/No%20Smoke%20Less%20Harm.pdf>
5. https://ashscotland.org.uk/wp-content/uploads/2025/07/Smoking-and-vaping-statistics-factsheet_June_2025.pdf
6. <https://www.health.govt.nz/statistics-research/surveys/new-zealand-health-survey/publications/202324-survey-publications/trends-in-smoking-and-vaping>

Sincerely,

Signatories

1. **Jasjit S. Ahluwalia** — MD, MPH, MS, Professor, Behavioral and Social Sciences and Professor of Medicine; Center for Alcohol and Addiction Studies; Brown University School of Public Health and Alpert School of Medicine. USA.
2. **Philippe Arvers** — MD. Addiction & Tobacco Specialist, Army Medical Center (CMA); Administrator, Francophone Tobacco Society (SFT); Associate Researcher, University of Grenoble Alpes & University of Savoie Mont-Blanc. France.
3. **Marcin Bąder** — Head of the Clinical Research Support Center. National Institute of Medicine, Ministry of Interior and Administration. Poland.
4. **Anastasia Barbouni** — MD, MSc, PhD. Professor of Public Health, Hygiene & Disease Prevention. Vice President Department of Public & Community Health School of Public Health, University of West Attica. Greece.
5. **Fabio Beatrice** — MD. Professor Emeritus of Otolaryngology, Hospital San Giovanni Bosco; Scientific Board Director Medical Observatory on Harm Reduction, (MOHRE). Italy.
6. **Carolyn Beaumont** — GP, FRACGP, MD, DipChildHealth, BMedSci (Dist.), Tobacco harm reduction clinician, educator and public speaker. Australia.
7. **Pavel Bém** — MD, PhD. Addictology Clinic, Charles University; Former Mayor of Prague. Czech Republic.

8. **György Bodoky** — Prof. Dr. Clinical oncologist. St. László Hospital, Dept. of Oncology. Hungary.

9. **John Britton** — Emeritus Professor, Former Director of the UK Centre for Tobacco and Alcohol Studies, Former Chair of the Royal College of Physicians Tobacco Advisory Group, and member of the board of trustees of Action on Smoking and Health. University of Nottingham. UK.

10. **Hugo Caballero Durán** — MD Former president of the Colombian Society of Pneumology. Former Clinical Scientific Director of Marly Clinic. Director of the Pneumology and Respiratory Therapy Service, Marly Clinic Bogotá. Colombia.

11. **Salvatore Chirumbolo** — PhD. Professor, Department of Engineering for Innovation Medicine, University of Verona. Italy.

12. **Alice Alberta Cittone** —Dental Hygienist, Myoralcare app project manager Scientific Director, Inter-Parliamentary Group on Lifestyles and Risk Reduction. Turin. Italy.

13. **Manuel País Clemente** — MD, PhD. Retired Full Professor Department of Otorhinolaryngology, Porto University School of Medicine, Vice-President European Medical Association. President World Voice Consortium, Portugal. International Association on Smoking Control and Harm Reduction (SCOHRE) Founding member. Portugal.

14. **Kenneth Michael Cummings** — PhD, MPH Professor of Psychiatry & Behavioral Sciences, and co-director Tobacco Research Hollings Cancer Center, Medical University of South Carolina, Charleston. USA

15. **Ole Davidsen** — MD. Specialist in Geriatrics & Internal Medicine. Denmark.

16. **Izabella Dessoulavy-Gładysz** — CEO, Mental Power- Brain Health Foundation. Poland.

17. **Carmen Escrig** — PhD. Genetics & Cell Biology, Autonomous University of Madrid. Spanish Medical Platform for Tobacco Harm Reduction (PRDT) Founding member. Spain.

18. **Sharifa Ezat Wan Puteh** — Professor of Hospital Management and Health Economics; Deputy Dean (Relation & Wealth Creation), Faculty of Medicine, UKM Medical Centre; Previous Head of International Centre for Casemix and Clinical Coding (ITCC), UKM Medical Centre, Malaysia.

19. **Karl Fagerström** — PhD, Lic. Psych. Professor Emeritus; President, Fagerström Consulting. International Association on Smoking Control and Harm Reduction (SCOHRE) Founding member. Sweden.

20. **Andrzej M. Fal** — Dr. Professor of Medicine. President, Polish Society of Public Health. Poland.
21. **Konstantinos Farsalinos** — MD, MPH, PhD. Researcher, University of Patras & University of West Attica; Vice-President, International Association on Smoking Control and Harm Reduction (SCOHRE). Greece.
22. **Fernando Fernández Bueno** — MD. Oncological surgeon at the Hospital Central de la Defensa Gómez Ulla. Professor at the University of Alcalá de Henares Madrid. International Association on Smoking Control and Harm Reduction (SCOHRE) Founding member. Spanish Medical Platform for Tobacco Harm Reduction (PRDT) Founding member. Spain.
23. **José M^a García Basterrechea** — MD. Associate Professor of Medicine, University of Murcia; Former Head, Addiction & Dual Pathology Unit, Reina Sofía Hospital. Spanish Medical Platform for Tobacco Harm Reduction (PRDT) member. Spain.
24. **José David García Muñiz** — MD, PhD. Clinical Pharmacology & Internal Medicine; Clinical Trials Coordinator & Principal Investigator, University Hospital of Ceuta. Spanish Medical Platform for Tobacco Harm Reduction (PRDT) member. Spain.
25. **Guillermo González Balmaseda** — MD. Specialist in Psychiatry, Madrid. Spanish Medical Platform for Tobacco Harm Reduction (PRDT) member. Spain.
26. **Miguel de la Guardia** — PhD. Professor of Analytical Chemistry, University of Valencia. Spanish Medical Platform for Tobacco Harm Reduction (PRDT) member. Spain.
27. **Carlos Gutiérrez Rodríguez** — MD. Specialist in Intensive Care Medicine. Spanish Medical Platform for Tobacco Harm Reduction (PRDT) member. Spain.
28. **Peter Hajek** — PhD. Professor of Clinical Psychology, Wolfson Institute of Population Health, Queen Mary University of London. UK.
29. **Wayne Hall** — PhD. Emeritus Professor, National Centre for Youth Substance Use Research, University of Queensland. Australia.
30. **Eszter HALMY** — PhD, MSc Obesity researcher, health services manager. President of the Hungarian Society for Study of Obesity. Hungary.
31. **Ignatios Ikonomidis** — MD, PhD, FESC, Professor of Cardiology, Member of EACVI, ex. Nucleus member of ESC WG on Aorta & Peripheral Vascular Diseases, Director of Echocardiography and the Laboratory of Preventive Cardiology, 2nd Cardiology Department, National and Kapodistrian University of Athens, Attikon Hospital, Athens. International Association on Smoking Control and Harm Reduction (SCOHRE) Board President. Greece.

32. **Martin Jarvis** — Emeritus Professor of Health Psychology. University' College London. UK.
33. **Martin Juneau** — MD, MPSc, FRCP(C), FACC. Cardiologist; Director, Observatoire de la Prévention, Montreal Heart Institute; Maître de Clinique, Faculté de Médecine, Université de Montréal. Canada.
34. **Māris Jurušs** — PhD. OEC. Associate Professor, Riga Technical University. Latvia.
35. **Piotr Karniej** — PhD. Assistant Professor, WSB Merito University, Wrocław; Collaborating Researcher, University of La Rioja. Poland/Spain.
36. **Joe Kosterich** — M.B.B.S WA State Medical Director for IPN, Clinical Editor of Medical Forum Magazine and Vice Chairman of the Arthritis and Osteoporosis Association of WA Perth West Australia.
37. **Lynn T. Kozlowski** — PhD. Professor Emeritus & Dean Emeritus, School of Public Health & Health Professions, University at Buffalo, State University of New York. USA.
38. **Jacques Le Houezec** — PhD. Scientist & Smoking-Cessation Specialist; Manager, Amzer Glas – CIMVAPE, training and certification organisation. France.
39. **Manuel Linares Abad** — PhD. Nurse Specialist in Obstetrics & Gynecology; Former Dean, Faculty of Health Sciences, University of Jaén. Spanish Medical Platform for Tobacco Harm Reduction (PRDT) member. Spain.
40. **Karl E. Lund** — PhD. Senior Researcher, Norwegian Institute of Public Health. International Association on Smoking Control and Harm Reduction (SCOHRE) Board Vice President. Norway.
41. **Olivia Maynard** — PhD. Associate Professor, School of Psychological Science, University of Bristol. UK.
42. **Bernhard-Michael Mayer** — PhD. Professor of Pharmacology, University of Graz. Austria.
43. **Garrett McGovern** — MD. GP specialising in Addiction Medicine; Medical Director, Priority Medical Clinic, Dublin. Ireland.
44. **Colin P. Mendelsohn** — MB BS (Hons). Tobacco Treatment Specialist; Founding Chairman, Australian Tobacco Harm Reduction Association (ATHRA). Sydney. Australia.
45. **Fares Mili** — MD, CTTS. Pulmonologist & Addictologist; Chairman, Tunisian Society of Tobacology and Addictive Behaviors (STTACA). International Association on Smoking Control and Harm Reduction (SCOHRE) Board Member. Tunisia.

46. **Kristina Mitikj** — PhD, DDS. Professor, Faculty of Dentistry, Ss. Cyril and Methodius University. North Macedonia.
47. **Vincenzo Montemurro** — MD. Cardiology and Internal Medicine. Head of the Cardiology Service of the CDC "Scilla d'America" (ASP Reggio Calabria) Scilla, National Secretary of the "We Are the Heart" Foundation of the S.I.C. (Italian Society of Cardiology). Italy.
48. **Viktor Mravčík** — MD, PhD, Assoc. Prof. Vice-chairman of the board of the Society for addictive diseases of the Czech Medical Association, Scientific advisor to national drug coordinator, head of research and innovations, Společnost Podane Ruce. Czech Republic.
49. **Maddu Narendra** — PhD. Assistant Professor, Department of Biochemistry, Sri Krishnadevaraya University. India.
50. **Ethan Nadelmann** — JD, PhD. Founder & former Executive Director, Drug Policy Alliance. USA.
51. **Joel L. Nitzkin** — MD, MPH, DPA. CEO & Principal Consultant, JLNMD Consultants, New Orleans, LA. USA.
52. **Fredrik H. Nystrom** — MD, PhD. Professor of Internal Medicine, Linköping University. Sweden.
53. **David Nutt** — Prof. DM FRCP FRCPSych FBPhS FMedSci DLaws. Professor of Neuropsychopharmacology, Imperial College London. UK.
54. **Marko Ölluk** — MD. Clinical Lead, Confido Health Centre; Family Practitioner. Estonia.
55. **Fiona Patten** — former Member of Parliament Victoria Australia. Harm Reduction speaker.
56. **Uladzimir Pikirenia** — MD, PhD, Psychiatrist, Psychiatric Hospital in Frombork, Frombork, Poland.
57. **Wolfgang Popp** — MD. Professor. Pulmonologist. Vienna. Austria.
58. **Marek Postula** — MD, PhD. CEO, Polish Society of Longevity Medicine; Medical University of Warsaw. Poland.
59. **Hernán Prat** — MD. Professor, University of Chile; Former Director Cardiovascular Department, Clinical Hospital of the University of Chile. Former President, Chilean Society of Hypertension. Chile.

60. **Josep Maria Ramon Torrell** — MD, PhD. Professor of Epidemiology & Public Health; Tobacco Prevention Service, Bellvitge Hospital, University of Barcelona. Spanish Medical Platform for Tobacco Harm Reduction (PRDT) member. Spain.
61. **Solomon Rataemane** — Prof. Independent Psychiatrist. Former Chairman of Department of Psychiatry Sefako Makgatho Health Sciences University. Africa regional Rep. World Association for Psychosocial Rehabilitation. Chair: Ministerial Advisory Committee on Mental Health. International Association on Smoking Control and Harm Reduction (SCOHRE) Founding member. South Africa.
62. **Dimitri Richter** — MD. Cardiologist, FESC. Head of Cardiac Department, Euroclinic; Vice-President, Hellenic Heart Foundation. International Association on Smoking Control and Harm Reduction (SCOHRE) Founding member. Greece.
63. **Randall Rodríguez Obando** — MD. Specialist in Internal Medicine & HIV Harm Reduction. Costa Rica.
64. **Brad Rodu** — Professor of Medicine; Endowed Chair in Tobacco Harm Reduction Research, University of Louisville, Louisville, KY. USA.
65. **Benjamin Rolland** — Prof. Psychiatre, Addictologue Pôle MOPHA (Médecine-Odontologie-Pharmacie-Addictologie), CH Le Vinatier Service Universitaire d'Addictologie de Lyon (SUAL), Hospices Civils de Lyon, CH Le Vinatier Service d'Accompagnement Médical des Centres de Rétention Administrative Lyonnais (SAMCRAL), Hospices Civils de Lyon. France.
66. **Louise Ross** — Stop-Smoking Lead, Smoke Free Digital; Former Manager, Leicester Stop Smoking Service. UK.
67. **Christos Savopoulos** — Professor of Internal Medicine. Director of 1st Medical Propedeutic Dept of Internal Medicine & Stroke Unit, Excellence Center of Hypertension AHEPA University Hospital. Thessaloniki. Greece.
68. **Rohan Savio Sequeira** — Prof. Dr. MD PhD Endocrine (HARVARD - USA) Consultant Cardio-Metabolic Physician. Specialist in Non-Invasive Cardiology, Diabetes, Endocrinology and Obesity Management Hon. Consultant Physician to the Governor of Maharashtra Professor and Head of the Department of Geriatric Medicine: Sir JJ Group of Govt Hospitals and Grant Govt Medical College. India.
69. **Evangelos Sdogkos** — MD. Director of Cardiology, General Hospital of Veroia. Greece.
70. **Andrzej Sobczak** — PhD Professor. Head of Department of General and Inorganic Chemistry Faculty of Pharmaceutical Sciences in Sosnowiec Medical University of Silesia Katowice. Poland.

71. **Ranko Stevanović** — MD, PhD. President, Croatian Society for Pharmacoeconomics and Health Economics; Croatian National Institute of Public Health. Croatia.
72. **Roberto A Sussman** — PhD. Institute for Nuclear Research, National Autonomous University of Mexico, ICNUNAM.
73. **David T. Sweanor** — JD. Chair of the Advisory Board, Centre for Health Law, Policy & Ethics, University of Ottawa; Legal Counsel, Non-Smokers' Rights Association (1983-2005). Canada.
74. **Andrzej W. Szawlowski** — Prof. MD, PhD, FACS. Oncologic Surgeon, Warsaw. Poland.
75. **Ingrid D. Taricano** — Prof. PhD. Independent toxicologist. São Paulo. Brazil.
76. **Enrique Terán** — MD, PhD. Professor, College of Health Sciences, Universidad San Francisco de Quito. Ecuadorian Academy of Medicine. Academy of Science of Ecuador. Ecuador.
77. **Umberto Tirelli** — Prof. Scientific and Health Director Tirelli Medical Group Clinic. Specialist in Oncology, Hematology and Infectious Diseases. Italy.
78. **Philip Tønnesen** — MD. Specialist in Pulmonary Medicine; Expert in smoking cessation. Senior Consultant, Sørernes Privathospital. Denmark.
79. **Francisco E. Urresta** — MD. Medical Director, Hospital Clínica Metropolitana, Ibarra. Ecuador.
80. **Diego Verrastro** — MD. Independent Specialist in Obesity and Emergency Medicine Surgeon. Argentina.
81. **Kenneth E. Warner** — PhD. Distinguished University Professor Emeritus & Dean Emeritus, University of Michigan School of Public Health. USA.
82. **Alex Wodak** — AM, FRACP, FACHAM. Emeritus Consultant, St Vincent's Hospital, Sydney, Australia.
83. **Dirk Ziebolz** — Prof. Dr. M.Sc. Dental, Oral & Maxillofacial Surgery Specialist. Germany.

Signatory Entities:

- **ETHRA** — European Tobacco Harm Reduction Advocates. EU Transparency Register: 354946837243-73
- **MOHRE** — Medical Observatory on Harm Reduction. Via Tomba di Nerone 14, 00189 Rome. Italy. <https://mohre.it/>
- **PRDT** — Spanish Medical Platform for Tobacco Harm Reduction. EU Transparency Register: 166296541422-35
- **SCOHRE** — International Association for Smoking Control and Harm Reduction, Michel Ange 12, B-1000 Brussels, Belgium.
- **Tobacco Harm Reduction, Inc.** (THR101) — Registered 501(c)(3) nonprofit organization dedicated to promoting public health through science-based education, research, and advocacy. Florida, USA