



## **Feedback from the German Social Insurance European Representation on the Evaluation of the Legal Framework for Tobacco Control**

The German Social Insurance (DSV) welcomes the European Commission's consultation on the evaluation of the legal framework for tobacco control. It makes sense that the EU wants to further develop the legal framework so as to further reduce the use of tobacco. This forms an important prerequisite on the basis of which the behaviour-related prevention approaches of social insurance in Germany can only achieve full effectiveness.

Tobacco use is the leading cause of preventable cancer. In Germany, 89 per cent of lung cancer cases in men and 83 per cent in women can be attributed to smoking.<sup>1</sup> DSV therefore welcomes the ambitious goal in the European Beating Cancer Plan to create a "tobacco-free generation" in which less than 5 per cent of the population uses tobacco by 2040, compared to about 25 per cent today.

### **DSV calls for extensive use of legislative levers to increase tobacco taxes, as well as extending taxation to novel tobacco and nicotine-containing products<sup>2</sup>.**

According to the German Cancer Research Centre, the annual tobacco tax revenue of more than 14 billion euros collected in Germany is offset by about 80 billion euros being spent on corresponding disease costs. One third of this is borne by the healthcare system. Fiscal measures have already proven effective in the past.<sup>3</sup> Significant increases in tobacco taxes are an effective way to reduce tobacco use. It makes sense for novel tobacco and nicotine-containing products to be subject to high and harmonised tax rates. It is also expedient to reduce the difference between tax rates for different products and to reduce existing price differences and related incentives for cross-border purchases in EU Member States.

### **DSV calls for extending and strengthening the Council's recommendation for more smoke-free environments, including outdoors.**

Second-hand smoking increases the risk of lung cancer by 20-30 per cent and increases the risk of coronary heart disease and death.<sup>4</sup> Even the supposedly more harmless aerosols from e-cigarettes and tobacco heaters are a health concern even for non-users in the vicinity and can harm sensitive populations. The EU needs to establish an improved study situation and research effort on health effects with regard to these novel products. DSV supports the call of the Special Committee on Beating Cancer (BECA) to scientifically assess the health risks of novel tobacco and nicotine-containing products and derive appropriate follow-up measures.



**The DSV calls for a complete ban on flavours in tobacco products, the introduction of standard neutral packaging, and consistent action against advertising and sales promotion by the tobacco industry.**

The flavours and aromas added to tobacco and nicotine-containing products, appealing package designs, and tobacco advertising make it easier to get into the habit of smoking. The revision of the regulatory framework must reduce the attractiveness for minors and non-smokers as well as smokers.

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<sup>1</sup> <https://www.dkfz.de/de/tabakkontrolle/download/Publikationen/sonstVeroeffentlichungen/Tabakatlas-Deutschland-2020.pdf>

<sup>2</sup>“New types of tobacco products” is a new tobacco products category introduced under the Tobacco Products Directive. These products do not fall into any of the conventional tobacco product categories.

<sup>3</sup> <https://www.gg-digital.de/2018/11/mit-steuern-steuern/index.html>

<sup>4</sup> <https://www.dkfz.de/de/tabakkontrolle/download/Publikationen/sonstVeroeffentlichungen/Tabakatlas-Deutschland-2020.pdf>