



October 28th 2013

Dear Sir/Madam,

We would like to express our deep concerns about the text voted in the European Parliament (EP) on 8th October 2013 on the Proposal for the Tobacco Products Directive (TPD). The current text not only threatens the jobs of millions of tobacco farmers in Europe, Africa, the United States, and around the world, but puts billions of dollars of future trade between the United States and EU at risk.

We understand the EP's ban on additives like vitamins and caffeine, as well as characterising flavours like candy, and we thank the Council and Parliament for taking our previous concerns into account. However, we remain very concerned by the text of Article 6 of the TPD as voted on by the Parliament, which requires "authorization" of all ingredients to be used in the processing of tobacco and in manufacturing of tobacco products. While this proposal may not seem to restrict ingredients at first glance, the criteria for adding ingredients to the list are technically impossible to meet, constituting a full ingredients ban.

The first problem that arises with this list is that the Parliament approved something that is non-existing, nobody has seen it, and the European Commission has yet to begin compiling. We are deeply concerned that the Parliament adopted a provision without a thorough impact assessment, which has not been tabled for consideration in the initial proposal by the European Commission, and was recently opposed by the EU because of its disproportionately negative impact on tobacco growers.

Moreover, we are alarmed that the EP has gone even further and voted to exclude many ingredients from the positive list without any detailed analysis. Firstly, a large number of these ingredients are widely used in foods, medicines and cosmetic products. Secondly, banning ingredients which emit carbon monoxide when burnt is a confusing and inexplicable provision since any substance emits carbon monoxide when burnt. Whilst we do not believe it is the intention of the Parliamentarians, this provision could technically result in a total ban on all cigarettes and cigars in the EU.

We not only believe that the text of Article 6 is unworkable, but if it was implemented it would result in the loss of jobs for millions of tobacco farmers around the world. In particular, burley tobacco – which is the dominant type of tobacco grown in many parts of Europe, areas of Africa, the United States, and around the world – is an essential component of traditional blend cigarettes and other tobacco products. Because of the unique characteristics of burley tobacco, certain non-characterizing flavourings and processing ingredients are necessary to manufacture these products.

In Europe, tobacco farmers in Poland, Italy, France, Spain and Bulgaria sell 90% of their product in the EU. Statistics show that 96% of agricultural holdings devoted to tobacco in Europe are family holdings, with an average cultivated area of between 0.5 and 3 hectares.



This means that very few tobacco farmers have alternative crops to fall back on or the financial resources to diversify. The socio-economic consequences of an ingredients ban would be devastating for communities across the EU.

Elsewhere around the world, the implications of this proposal would be even more damaging. In Malawi for example, where burley leaf accounts for more than 60% of foreign earnings, the Parliament's proposed ingredients ban would affect hundreds of thousands of farmers and millions of dependants on the crop. The EU is the top market for burley tobacco from the United States. In 2011 alone, the U.S. shipped more than 14 million kilograms of burley leaf to the EU, with a value of more than 110 million U.S. dollars.

In light of ongoing trade discussions between the U.S. and the EU, the proposal has the unintended consequence of discriminating against America's burley farmers and could jeopardize efforts to conclude trade negotiations between the two regions.

We do not believe these unintended consequences – jeopardizing hundreds of thousands of jobs and billions in future trade – were the objective of the European Parliament and do not believe parliamentarians would have adopted this amendment if its consequences had been fully understood.

Therefore, we kindly ask you to require a thorough revision of Article 6 during the process of negotiations on the Tobacco Products Directive with the Council and the Parliament and to take into consideration our views in the interests of the millions of tobacco growers and the families and communities they support in Europe and around the world.

Yours sincerely,

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President of the International Tobacco Growers Association
ITGA

Mr Benicio Albano Werner
President of the Tobacco Growers Association of
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Mr Ruben Maigwa
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Mr François Veddel
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Secrétaire Délégué

Burley Tobacco Growers
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cc:

- Vytenis Povilas Andriukaitis - Minister of Health of the Republic of Lithuania
- Ambassador Arunas Vinciunas - Permanent Representation of Lithuania
- Commissioner Dacian Cioloş (Agriculture & Rural Development)
- Commissioner Karel De Gucht (Trade)
- Commissioner Tonio Borg (Health)
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