

ESTOC, EUROPEAN SMOKELESS TOBACCO COUNCIL, WAS ESTABLISHED IN 1989 AND REPRESENTS THE INTERESTS OF SMOKELESS TOBACCO MANUFACTURERS AND DISTRIBUTORS AS WELL AS TOBACCO TRADE ASSOCIATIONS. WE MONITOR ALL SMOKELESS TOBACCO RELATED ISSUES, INCLUDING THE LATEST SCIENTIFIC DEVELOPMENTS AT A EUROPEAN AND GLOBAL LEVEL.

ESTOC'S OBJECTIVE IS TO SECURE THE ABILITY TO SELL SMOKELESS TOBACCO PRODUCTS THAT COMPLY WITH APPLICABLE REGULATORY FRAMEWORKS IN EUROPE AND IN OTHER PARTS OF THE WORLD.

ESTOC – PART OF THE EU VOLUNTARY REGISTER OF INTEREST REPRESENTATIVES

By signing up to this voluntary register, ESTOC demonstrates, in the context of the European Transparency Initiative, its strong commitment to transparency and the full legitimacy of its activities. As a registered party, ESTOC commits to the European Commission's [Code of Conduct](#).

FRAMEWORK CONVENTION ON TOBACCO CONTROL (FCTC)

The Framework Convention on Tobacco Control (FCTC) entered into force in February 2005. It is the first international treaty in the field of public health and covers many aspects of tobacco control, including tobacco advertising, health warning labels, price and tax issues, illicit trade (smuggling) and smoking cessation programs.

ESTOC agrees that many of the issues raised by the FCTC need to be addressed. Tobacco products carry risks to health and we believe that appropriate and workable regulation of the tobacco industry is both necessary and right.

Several of the Articles of the FCTC have been elaborated in the form of non-binding guidelines to governments that are Parties to the FCTC. The guidelines on Article 5.3 of the FCTC addresses the issue of "Protection of public health policy with respect to tobacco control from the commercial and other vested interests of the tobacco industry". **It is important to stress that guidelines are non-binding; they outline measures that the governments may consider to regulate the interactions with the tobacco industry and the stakeholders.**

OUR RIGHT TO ENGAGE

- ESTOC is in favour of appropriate and workable regulation.
- Such regulation should be based on scientific evidence, ensuring it is both fair and proportionate, thereby helping to reduce the public health impacts of tobacco use.
- Unfortunately, we are concerned that this isn't happening and that attempts will be made to push through ill-thought out and incomplete proposals that are not backed up by sound scientific evidence and which can have significant adverse consequences, such as encouraging illicit trade.
- We will therefore continue to offer constructive views and solutions and urge that those most likely to be affected by regulatory proposals are consulted.
- We believe that views advocated as part of policy formation should be transparent. Regulators should follow the principles of participation, openness, accountability, effectiveness and coherence.
- **Given the complexities of tobacco regulation, we urge governments to work with tobacco companies as well as other stakeholders and public health authorities in implementing the FCTC. The expertise of tobacco companies is especially important in areas such as illicit trade prevention, fiscal policy, and product regulation.**

Mr Siim Kallas, Vice-President of the European Commission responsible for Administrative Affairs, Audit and Anti-Fraud: *"I would first like to say that there is nothing wrong with lobbying. Lobbying or interest representation is a natural part of democratic decision-making processes. By providing policy-makers with information from different angles and with specialist ideas, **lobbying also contributes to better policies** (emphasis added). Lobbying is therefore also an important and legitimate part of the EU decision-making processes."* (2007)

ESTOC

Rue due Trône 108 Troonstraat • B-1050 Brussels, Belgium • VAT BE 0440 322 194
Office: +32 2 646 34 97 • Fax: +32 2 646 35 97 • info@estoc.org • www.estoc.org
KBC Bank 437-6219441-33 • IBAN: BE794376 2194 4133 • BIC: KREDBEBB