

Bulgarian Ministry of Health

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To: THE DIRECTORATE-GENERAL FOR HEALTH AND CONSUMERS

Dear Sir/Madam

The Ministry of Health of the Republic of Bulgaria would like to express the following opinion as part of the public consultation for revision of the tobacco products Directive 2001/37/EU initiated by the European Commission Directorate-General for Health and Consumers.

The Ministry of Health supports a change to the Directive. Based on our experience of applying the Directive, we propose the following from the suggested options:

1. The scope of the Directive

The Ministry of Health supports option No 2 in accordance with which the scope of the Directive should be extended to include new forms for the use of tobacco, such as herbal cigarettes, electronic nicotine delivery systems and foodstuffs containing nicotine, pharmaceuticals and other ingredients (recognised in some countries as a foodstuff). The scope of the Directive should be extended so that any new forms of tobacco consumption, tobacco products or nicotine delivery methods to be placed on the market can fall within it. We support the prohibition of new forms for oral use, as is the case with snus. The Ministry of Health supports the view requiring a description of the contents of these goods for the general public as well as health warnings on them. Manufacturers must also meet the requirement to provide the competent authorities with a description of all ingredients contained in these products.

2. Smokeless tobacco products

At first sight, smokeless tobacco products cause harm only to users but they are no less harmful than the emissions of tobacco products. The Ministry of Health agrees with option No 3 as the most effective – a ban on all types of smokeless tobacco products that could be used even by children.

3. Consumer information

The Ministry of Health agrees that additional methods should be used to improve consumer information concerning harm caused by tobacco products. Colour pictures should be compulsory for all Member States of the European Union - option No 2a. In addition to colour photographs, we think that it is very important to publish a telephone number for a hotline for giving up smoking on one side of the packet and the inside of packets should be

used for additional information about harm caused by tobacco products. This information should also be placed on hookah pipes. With regard to option No 3, the Ministry of Health considers that the introduction of plain packaging for tobacco and tobacco products under the Directive will reduce the attractiveness of tobacco product packets and will lead to reduced consumption among young people.

4. Reporting and registration of ingredients

The Ministry of Health supports both position No 2 - the introduction of a common compulsory reporting format for ingredients of tobacco products by the tobacco industry to the European Commission and position No 3 according to which fees and sanctions should be introduced for manufacturers and importers of tobacco products who have not registered the ingredients of tobacco products. We think that only tobacco products with registered ingredients for which the corresponding fee has been paid should be available on the market. Manufacturers and importers of tobacco products with unregistered ingredients should face fines.

5. Regulation of ingredients

The Ministry of Health supports option No 3, which requires a list to be drawn up of tobacco ingredients, showing their toxicity, attractiveness and addictive capacity, when consumed orally or smoked. We suggest using the list that includes fewer substances, making it easier to monitor the substances on the list.

6. Access to tobacco products

The Ministry of Health supports option No 3, in all its forms. The sale of tobacco products to children under 18 years is banned in Bulgaria including from vending machines but there are Member States in the European Union where this is permitted. The Ministry of Health proposes to take into account good practices (e.g. Finland) whereby tobacco products are purchased from a catalogue in places where they are available for retail sale.

Yours sincerely

Desislava Dimitrova
Deputy Minister