

Ministry of Health, Slovenia

– electronic contribution – rec. 260 - by Ministry of Health of the Republic of Slovenia  
gp.mz@gov.si

Question 1 - scope

Problem definition	Which option	Recommend option	Additional option
Yes	Extend the scope	<p>Beside harmonized safety and quality requirements there is a need for harmonized classification of these products. All tobacco products are hazardous to health – there is no safe level of usage. Therefore the scope of the Directive should include the regulation of any new smoked tobacco products (such as low emission or nicotine-free cigarettes), while the prohibition of any novel forms of oral tobacco, including snus, should be maintained. Also herbal cigarettes should be included in the scope Tobacco Products Directive and should also be subject to health warnings requirements. All forms of nicotine based products (that is, products containing nicotine but which are not tobacco products, such as electronic cigarettes, nicotine gel, drinks, and sweets) are often marketed as alternatives to cigarettes and in some cases as an aid to quitting smoking. Therefore, they should only be sold as quitting aids and comply with specific safety and quality requirements under the same regulatory framework as</p>	

		pharmaceutical products rather than under the scope of the Tobacco Products Directive.	
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Question 2 – smokeless tobacco

Problem definition	Which option	Recommend option	Additional comments
Yes	Ban on all types of smokeless tobacco products		Ban on all types of smokeless tobacco products - addresses the problem most effectively. We do not support wide availability of these products. In case there would be enough data to support the role of these products in smoking cessation, these products should be classified as such. We find Option 1 – No change - an acceptable option in case Option 3 is not widely supported.

Question 3 – consumer info

Problem definition	Which option	Recommend option	Additional comments
Yes	Improve consumer information; Introduce generic or plain packaging	Picture warnings to become mandatory; Information on harmful substances in tobacco products that cannot be placed on the package would be placed inside the package; Health warnings to be put on water pipes	Picture warnings should become mandatory on the both sides of the cigarette pack and should be large (80% of the pack) because the size of warning messages increases the effectiveness of the warning amongst both young and adult smokers / non smokers.

Question 4 – reporting

Problem definition	Which option	Recommend option	Additional option
Yes	Establish a common compulsory reporting format; Introduce fees and sanctions		Based on the experiences of the Institute of public Health of the republic of Slovenia we would like to add the following to the description of the problem: -a number of different formats and reporting mechanisms (no obligatory format) result in the problem with organizing, comparing, analyzing and public dissemination of the information, but also pressure from tobacco industry because of trade secrets.

Question 5 – ingredients

Problem definition	Which option	Recommend option	Additional option	Additional comments
Yes	Establish a common list of tobacco ingredients	Establish a positive common list of tobacco ingredients;  Establish a negative common list of tobacco ingredients	Regulation of attractive substances in tobacco products is highly important in prevention of smoking initiation and continuation among adolescents.	Member States should have the right to include additional substances to the negative list nationally in case they find this necessary to protect public health.

Question 6 – access to tobacco products

Problem definition	Which option	Recommend option	Additional option
Yes	Ban	Cross-border retail sales of tobacco to be banned over the Internet; Vending machines to be banned; Promotion and displays in retail stores to be banned	In general we agree with the problem definition, but we would also like to emphasize the importance of a large number of tobacco products sales points which increase the

			accessability of tobacco products and the need to address this issue. There is a need for measures to reduce tobacco products sales points (licencing).
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