

Scientific Errors in the Tobacco Products Directive

Your ref: Ares(2014)179781 – 27/01/2014

January 31, 2014

Dear Mr. Seychell

We do appreciate your response to our letter, and we thank you for your quick reply.

However, we do not think that our concerns were addressed. The legislation remains based on misunderstood or misinterpreted evidence and imposes restrictions which are not justifiable. A legislation that regulates e-cigarettes in a more restrictive way than tobacco cigarettes that are much more harmful by any standard of measurement will be damaging for public health.

We accept your clarification about the consistent dosing as concerning nicotine content in vapour rather than nicotine delivery to users as the wording implies. The wording could be made clearer.

Considering the rest of your response, this ignores our arguments that the statements concerning nicotine toxicity, nicotine threshold and use by non-smokers or adolescents, which form the basis of the proposed restrictions, are not substantiated by evidence and are therefore inappropriate.

You state that 'electronic cigarettes with such a nicotine threshold or below help the vast majority of smokers' and 'already today we see that their consumption is no longer limited to established smokers' but there is no evidence for these assertions that we are aware of.

As it stands, the proposed legislation is aiming to prevent negligible and mostly imaginary dangers while threatening to undermine much more likely and much more substantial benefits.

Yours sincerely,

Signatories

As per your request, please find below the Col of the signatories.

Professor Jean-François ETTER, PhD

Institut de santé globale, Faculté de médecine, Université de Genève, Switzerland.

I was reimbursed by an e-cigarette manufacturer for travels to London and to China, but was not paid for these talks.

Dr. Konstantinos Farsalinos, MD

Researcher, Onassis Cardiac Surgery Center, Athens, Greece

Researcher, University Hospital Gathuisberg, Leuven, Belgium.

I have no financial interests in any e-cigarette company. Some of my studies were performed using funds provided to the institution by e-cigarette companies. My salary is paid by a scholarship grant from the Hellenic Society of Cardiology.

Professor Peter Hajek, PhD

Wolfson Institute of Preventive Medicine, Barts and The London School of Medicine and Dentistry
Queen Mary University of London, London, UK.

I have no links with any e-cigarette companies.

Dr. Jacques Le Houezec, PhD

Consultant in Public Health, Tobacco dependence, Rennes, France

& Honorary Lecturer, UK Centre for Tobacco Control Studies, University of Nottingham, UK.

I have received no financial support from e-cigarette companies, nor received any other significant benefit (e.g. travel etc).

Dr. Hayden McRobbie, MB ChB PhD

Reader in Public Health Interventions, Wolfson Institute of Preventive Medicine, Queen Mary University of London, UK.

I have received no personal financial or non-financial support from any companies for research on e-cigarettes. PGM International provided products at no cost for the public-good funded ASCEND e-cigarette trial and I have undertaken research on Ruyan e-cigarettes, for which the University of Auckland was funded by Health New Zealand, independently of Ruyan.

Professor Chris Bullen, MBChB, PhD

Director, The National Institute for Health Innovation, The University of Auckland, Auckland, New Zealand.

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Professor Lynn T. Kozlowski, PhD

Dean, School of Public Health and Health Professions, Professor of Community Health and Health Behavior, University at Buffalo, State University of New York, USA.

I have not undertaken research, provided consulting or received funding/travel support from electronic cigarettes companies.

Dr. Mitchell Nides, PhD

President, Los Angeles Clinical Trials, Director, Picture Quitting, the Entertainment Industry's, Quit Smoking Program, Burbank, CA 91505, USA.

I have received research funding from NJOY Inc, Scottsdale, AZ.

Professor Dimitris Kouretas, MD

Professor and Deputy Rector University of Thessaly, Greece.

The University of Thessaly signed a research proposal between University and The Greek Chamber of e-cigarettes importers to test the toxicity of the liquids that are sold in the Greek market. I have not received money from any e-cigarette company.

Professor Riccardo Polosa, MD, PhD

Director of the Institute for Internal Medicine and Clinical Immunology, University of Catania, Italy.

I have been serving as a consultant for Arbi Group Srl (Milano, Italy), the Italian distributor for 'Categoria' e-Cigarettes.

Dr. Karl Fagerström, PhD

President, Fagerström Consulting AB, Vaxholm, Sweden.

I have no links with any e-cigarette companies.

Professor Martin Jarvis, Dsc

Emeritus Professor of Health Psychology, Department of Epidemiology & Public Health, University College London, UK.

I have no financial links with any electronic cigarette company, and have not consulted for or received travel support or research resources from any such company.

Dr. Lynne E. Dawkins, PhD

Senior Lecturer in Psychology, School of Psychology, University of East London, Stratford, London, UK.

I have no personal financial or non-financial interests in the e-cigarette industry. My university (University of East London, UEL) has received funding from Skycig Ltd for a research project that I coordinated as well as travel funds and hospitality from Totally Wicked and E-Lites.

Dr. Pasquale Caponnetto, Assistant Professor, Researcher

Centro per la Prevenzione e Cura del Tabagismo, Azienda Ospedaliero-Universitaria "Policlinico-V. Emanuele", Università di Catania, Catania, Italy.

PC declares no conflict of interest.

Professor Jonathan Foulds PhD

Professor of Public Health Sciences & Psychiatry, Penn State University, College of Medicine, Cancer Institute, Cancer Control Program, Hershey, PA 17033-0850, USA.

I have not received any financial compensation of any kind from an electronic cigarette company, nor received any other significant benefit (e.g. travel etc).