

## STM Kirjaamo

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**Lähetettäjä:** Jens Hennild <jh@tobaksindustrien.dk>  
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**Vastaanottaja:** STM Kirjaamo  
**Aihe:** case no. STM/2645/2017

The Ministry of Social Affairs and Health  
Helsinki, Finland

Sent by email: [kirjaamo@stm.fi](mailto:kirjaamo@stm.fi) case no. STM/2645/2017

19 October 2018

Dear Sirs,

**Re. STM/2645/2017 the use of flavours in traditional pipe tobacco, cf. section 4.2.2. of the report “Development of a nicotine and tobacco policy”, May 2018**

Mindful of the aim of Finland to become a tobacco free nation as of 2030 with less than 5 pct. tobacco users, we thank for this opportunity to present our view.

Tobaksindustrien represents Danish tobacco companies with production in Denmark. Today, pipe tobacco, which by far is the most traditional/historical way of smoking tobacco, is a Danish industrial niche stronghold as two Danish companies; Scandinavian Tobacco Group and Mac Baren Tobacco produce more than 80 pct. of all traditional pipe tobacco consumed worldwide.

We have noted that the report under the heading for section 4.2. “Prevention of young people taking up smoking” in section 4.2.2 suggests to expand the ban on characterizing flavours to also apply to pipe tobacco.

On that background, we would like to inform you that a potential ban on the use of characterizing flavours in all tobacco products would have much more severe and damaging implications for the pipe tobacco category than for any other type of tobacco products.

The severity stems from the fact that contrary to for instance cigarettes there is a very long tradition for adding flavours to the tobacco when blending a pipe tobacco – flavours are an inherent part of the product. Actually, the tradition is so strong and consequently the expectations of the consumer for the presence of ingredients so demanding, that a ban on the use of characterizing flavours in pipe tobacco is likely within a short period after an introduction to completely erode this historical way of consuming tobacco. That was also clear to the European Commission and the European Parliament and member states, when the pipe tobacco category was exempted from the ban on characterizing flavors in the Tobacco Products Directive in 2014.

There is also a considerable difference between the pipe tobacco and other tobacco product as regards the consumer profile. We would like to stress that the typical pipe tobacco smoker is a mature male who has a moderate consumption. That is underlined by the latest figures from Euromonitor published 2017 by the Commission (Report 458 “Attitudes of Europeans toward Tobacco and Electronic Cigarettes”). According to its findings, less than one pct. of the Fin smokers responded that they are daily pipe smokers. A 2 pct. smoke once a week, and less than 4 pct. smoke a pipe on a monthly basis – hereby making pipe tobacco the least used smoking tobacco product in Finland.

Pipe smoking in itself is not an easy way of smoking as it takes time to learn and because of the “tools” and time, it requires to consume. It is not a product that is used for smoking initiation for non-smokers, not to mention youngsters, and pipe smoking does not appeal to these groups. This is also documented in the said Euromonitor report, p. 85 according to which only 1 pct. of smokers started smoking by smoking a pipe. In other words, a ban on characterizing flavours in pipe tobacco is of no real significance considering the declared purpose of such a ban, namely to prevent young people from taking up smoking.

Overall, from a health and protection perspective the possible gains of an imminent closure of the pipe tobacco category through flavour/aroma ban seems somewhat limited and a ban therefore in our opinion is a disproportionate measure which cannot be justified.

We therefore strongly call upon you for a more flexible approach where the use of characterizing flavours/aromas in pipe tobacco is not prohibited.

We would appreciate the opportunity to elaborate on our opinion, for instance at a meeting.

Best regards

**TOBAKSINDUSTRIEN**

Jens Hennild  
CEO

Tobaksindustrien  
Vesterbrogade 1L,2.sal.  
DK 1620 Copenhagen V

Phone : +45 39 62 68 99  
Mobile: +45 20 35 12 99  
E-Mail: [jh@tobaksindustrien.dk](mailto:jh@tobaksindustrien.dk)