



We are providing a comment as representatives from the Premium Cigar Association. A United States based association that represents over 3000 specialty retail tobacconists and over 250 handmade cigar manufacturers which comprise an estimated 330,000 jobs internationally. Below is evidence that should be considered by the European Commission when revising the EU tobacco control framework following the adoption of its '2040 Tobacco Free generation'.

- Due to a wide range of factors, most important of which is the lack of inhalation, and frequency of use, the health consequences of handmade cigars smoking overall are likely to be less than those smoking other types of tobacco products. This was in the NIH/FDA PATH Study and the NASEM Study which was commissioned by the FDA, published in March 2022. These are not industry studies, they are Federally commissioned, independent studies on the patterns of use, health effects and marketing of handmade cigars.
- The patterns of use for handmade cigars is an important reason to be treated distinctly differently than other tobacco products. Any and all restrictions proposed by the European Commission, should consider the lack of daily/weekly use when drafting proposed sweeping rules on all tobacco products. The average handmade cigar smoker reported smoking cigars 1.2 days out of 30 days. This has been consistently showcased in Eurobarometer studies and the NIH/FDA PATH Study, which also determined that the average age of starting to smoke handmade cigars was at 30 years old.
- The NASEM Study notes: “There is insufficient evidence to determine if occasional or nondaily exclusive cigar use in general is associated with increased health risks.”<sup>1</sup>
- Handmade cigars are different than any other tobacco product for all of the reasons above and the storage and the way they are purchased. The storage of handmade cigars requires strict humidity and temperature control of around 70%RH and 21°C. These strict storage requirements need specialty retail locations to sell handmade cigars.
- Many handmade cigar manufacturers and cigar tobacco growers are based in the United States. If handmade cigar sales were further restricted in Europe, many of these manufacturers and growers would likely have to reduce employment and development. These small farming communities would see a drastic change in demand if further action is taken in Europe to restrict the sales of handmade cigars.
- Data provided by the CDC publishes up to date information on youth access to tobacco products, and youth usage of tobacco products. This study has shown that there is a stark decline in youth smoking across the U.S. which is the largest tobacco market in the world. Since 2019, smoking among youth has decreased by over 29%. The rules already in place are proving to be effective and further regulation is unnecessary.

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<sup>1</sup> National Academies of Sciences, Engineering, and Medicine. 2022., 16



Considering the above, handmade cigars should continue to benefit from a different regulatory treatment within the EU tobacco control legislation, which should primarily focus on products affecting the overall EU smoking prevalence.

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National Academies of Sciences, Engineering, and Medicine. 2022. Premium Cigars: Patterns of Use, Marketing, and Health Effects. Washington, DC: The National Academies Press. <https://doi.org/10.17226/26421>.

U.S. National Institute of Health and the U.S. Food and Drug Administration. "Path (Population Assessment of Tobacco and Health) Study - Home." National Institutes of Health. U.S. Department of Health and Human Services. Accessed June 17, 2022. <https://pathstudyinfo.nih.gov/>.

"Trends in Tobacco Use among Youth." Centers for Disease Control and Prevention. Centers for Disease Control and Prevention, April 12, 2022. [https://www.cdc.gov/tobacco/data\\_statistics/fact\\_sheets/fast\\_facts/trends-in-tobacco-use-among-youth.html#:~:text=Nearly%20%20of%20every%20100,decrease%20from%204.3%25%20in%202011.&text=Nearly%205%20of%20every%20100,decrease%20from%2015.8%25%20in%202011](https://www.cdc.gov/tobacco/data_statistics/fact_sheets/fast_facts/trends-in-tobacco-use-among-youth.html#:~:text=Nearly%20%20of%20every%20100,decrease%20from%204.3%25%20in%202011.&text=Nearly%205%20of%20every%20100,decrease%20from%2015.8%25%20in%202011).