Position Paper
HEAT NOT BURN TOBACCO & RELATED PRODUCTS

Preamble

1. The French Alliance against tobacco (Alliance contre le tabac) brings together 25 NGOs & organisations and aims in particular to inform the public about the consequences of smoking and the measures designed to fight it in order to organise smoke free and the emergence of tobacco-free generations in France.

2. The consumption of tobacco products is the leading cause of preventable deaths in France. It kills 73,000 people per year, or 200 people per day.

3. In accordance with the obligations of the Framework Convention on Tobacco Control (FCTC), signed and ratified by France, all tobacco control strategies must be studied in the light of health, behavioural, economic and social aspects in order to:
   ✓ Reduce the supply and attractiveness of tobacco products,
   ✓ Normalize their use in society,
   ✓ Prevent initiation among young people,
   ✓ Promote cessation among smokers.

4. Heated tobacco, commonly referred to as "heat not burn" (abbreviated as "HNB"), and related products, are tobacco products promoted by tobacco companies. One of the leaders said that "these products will supplant the classic cigarette in a few decades!".

5. The goals of major tobacco companies for placing on the market heated tobacco, appear to be the re-normalization of tobacco and financial benefits and not the treatment of consumers tobacco dependence or the promotion of the end of tobacco.

6. The nicotine delivery devices considered in this position paper are offered in the form of mini-cigarettes (stick) or specially prepared tobacco capsules soaked with different ingredients.

7. The first devices dated from 1988-2005 (Accord®, Premier®). They functioned in a similar way to a shisha: a burning of coal that heated tobacco. As with shisha, coal combustion produced a lot of CO and particulate matter. These first devices are referred to in this position paper as coal-heated tobacco. These products have been abandoned, their taste unpleasant to consumers.Nevertheless, a new product of this type is in the launch phase (Revo®).

8. Electric resistance heated tobacco, described by manufacturers as unburned, appeared in 1998 and are the most numerous tobacco on the international market. Some of these products have been discontinued (Accord®, Oasis®), others seem to be at the end of their useful life (Heatbar®, Ploom®), while some devices are in the launch phase (IQOS®, GLO®) and are referred to in this opinion as electric-heated tobacco.

9. Since 2017, a new range of products has been operating on the combination of a vaporization of a liquid that passes through tobacco. Tobacco is not heated in all products. In this position paper, these products will be referred to as hybrid vape/heated tobacco.

10. A major factor has hindered the initial development of heated tobacco and related products: the lack of nicotine delivery to create and maintain addiction.

11. Over the past five years, the success of nicotine devices has boosted product development in all three categories defined earlier. Cigarettes manufacturers are now trying to improve their taste, claiming to reduce the toxicity of emissions, while preserving nicotine peaks, which are the source of continued addiction and thus the market for addiction.

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1 La CCLAT est le premier et le seul Traité international traitant de santé publique. Il est actuellement le traité onusien le plus ratifié au monde : 181 Parties au traité et plus de 90% de la population couverte par les 38 articles.
2 Art. L. 3512-1 du Code de la santé publique
3 André Calantzopoulos, Directeur Général de PMI – Philip Morris International "For the first time in history, we have products with the real potential to both accelerate harm reduction and grow our business", Consumer Analyst Group of New York (CAGNY) Conference February 17, 2016
New heated tobacco products appear to be designed to be addictive

12. The new heated tobacco products are designed to maintain a high level of nicotine addiction in the smoker. New devices placed on the market have had a limited heating time of around 5 minutes, forcing them to inhale mini cigarettes in a very short period of time. This mode of inhalation induces nicotine spikes that maintain a high level of nicotine dependence. This risk must be confirmed by rigorous, independent and adequate studies.

Not all heated tobacco is "unburned"

13. Many products classified as "unburned" heated tobacco products actually release solid fine particles and carbon monoxide (CO), indicating incomplete combustion in the form of oxygen deficiency. While older models emitted more CO than conventional cigarettes, newer models, such as IQOS®, emit significant amounts of CO, as well as carcinogens and other combustion products from tobacco in the smoke produced.

What’s in heated tobacco & its emissions ?

15. Heated tobacco is prepared specifically for this use by fermentation, choice of ingredients and cutting. Propylene glycol and glycerol are widely used as ingredients. The temperature of tobacco heating varies from 170°C to 950°C depending on the products, according to manufacturers' information, and is accompanied by a wide range of toxic emissions.

Heated tobacco must be subject to the rules on smoked tobacco products

17. The prohibition, set out in the Public Health Code, on direct or indirect advertising and propaganda and any claim that one tobacco product is less dangerous than another must be enforced. The aim is to put an end to the media coverage that echoes the communication of tobacco companies, which inundates them with allegations of alleged "risk reduction".

18. Heated tobacco releases toxic products into the environment and must be subject to the same regulations as traditional smoked tobacco in order to protect non-smokers and ex-smokers.

Heated tobacco is more of a problem than a solution for tobacco control

22. In view of the independent data available, heated tobacco and related products are opposed to the emergence of tobacco-free generations and, more generally, to the end of smoking, and appear to be a problem and not a solution.

Independent data on heated tobacco is insufficient

16. Most of the "scientific" publications on these products come from the tobacco industry. It is therefore imperative to develop independent research and a process for monitoring registered products before they are placed on the market.

19. The textual and graphic health warnings on the packaging must be those of other products classified as other smoked tobacco.

20. The sale of tobacco products in France is a monopoly of the tobacconists. The banning of specialised shops selling and promoting a single brand, whether physical or online, must be respected.

21. These new tobacco products must be subject to the excise duties on other smoked tobacco.

The 17 participants who participated in the drafting and validation of the Opinion - November 2017


5 Art. L. 3512-17-I du Code de la santé publique
6 Art. L. 3512-7-I du Code de la santé publique
7 Art. L. 3512-8 du Code de la santé publique
8 Art. L. 3512-22-I du Code de la santé publique
9 L’implantation, dans de nombreux pays, de boutiques spécialisées adaptant les codes des grandes boutiques de marque Nespresso® ou Apple® a clairement pour ambition de renormaliser le tabac et rendre acceptable aussi bien ces nouveaux produits du tabac que les anciens, et ne doit pas être autorisée pour faire la promotion d’un produit du tabac
10 Art. 575 du Code Général des Impôts

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