To: Ursula von der Leyen
President of the European Commission

With copies to:

Stéphane Séjourné	Executive Vice-President for Prosperity and Industrial Strategy
Teresa Ribera Rodríguez	Executive Vice-President for a Clean, Just and Competitive Transition
Roxana Mînzatu	Executive Vice-President for Social Rights and Skills, Quality Jobs and Preparedness
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Jessika Roswall	Commissioner for Environment, Water Resilience and a Competitive Circular Economy
Wopke Hoekstra	Commissioner for Climate, Net Zero and Clean Growth
Ilze Juhansone	Secretary-General of the European Commission

03 November 2026

A coherent approach to health, competitiveness and resilience across Europe's tobacco and nicotine value chain

Dear President von der Leyen.

We write to you today as **201 organisations** representing every link in Europe's tobacco and nicotine value chain, from farmers, component suppliers and manufacturers, to logistics, retailers and associations.

Individually, our organisations speak for different trades, regions, and interests. Together, we speak for a sector that sustains livelihoods in every country across the European Union, from hundreds of thousands of retailers, tobacconists, smallholding farms and other SMEs to regional champions and multi-country operators. We are present in almost every village, town and city across Europe.

With the announced revision of the Tobacco Products Directive, the Tobacco Advertising Directive, the Tobacco Taxation Directive and initiatives tabled as part of the next EU long-term budget, our sector is entering a pivotal moment, with possible far-reaching economic and social consequences.

Consider all available evidence

We, therefore, urge the EU Commission to consider the expertise of all those who know this sector best: economic operators and Europe's citizens. All stakeholders should be part of the consultation process, including the industry, whose expertise is indispensable for better lawmaking in Europe.
We also call on the EU Commission to anchor any future measures in the full body of scientific and real-world evidence on new and emerging tobacco and nicotine products, including independent assessments by European and international government authorities.

Driving value creation in Europe

Any future policy framework should be grounded in the principles of conferral, subsidiarity, and proportionality, while respecting fundamental rights of consumers and economic operators.
The stakes are significant. Europe's tobacco and nicotine value chain supports over 1.5 million jobs, contributes approximately €195 billion to EU GDP annually, and generates more than €107 billion a year in excise duties and VAT[1]. It is a deeply European value chain that supports livelihoods, industrial capacity and public finances across the Union.

[1] Standard & Poor, Global Market intelligence, *The Economic contributions of the traditional tobacco and new nicotine products value chains to the EU-27* (2023)

Accounting for market realities and anticipating potential side effects and unintended consequences is critical.

The illicit market – a key challenge for enforcement

Today, approximately one in ten cigarettes consumed in the EU is illicit, costing public budgets an estimated €13 billion annually in lost revenues and undermining public safety[2]. Illegal trade and non-compliant trade undermine the Single Market, disadvantage responsible economic operators, deprive governments of revenue, weaken consumer protections and provide financing for organised criminal networks.

Any policies should therefore be specifically assessed not only for their intended effects, but also for the risk of displacement into illicit channels, additional enforcement burdens and other unintended consequences.

We support policy that protects public health. We also believe that this objective can be achieved with the current framework while still supporting the Commission's wider priorities for improving competitiveness, innovation and resilience. At a time of increased global geopolitical uncertainty, we have continued to invest in Europe, grow in Europe, and export from Europe.

Transformation that delivers more competitiveness

Our contribution is further amplified as our sector undergoes rapid transformation. Consumer preferences are changing and businesses are investing billions of euros in new technologies, smokeless products and advanced supply chains.

The evaluation of the current legislative framework does not adequately account for the contribution of this transformation to advancing public health, supporting the orderly functioning of the internal market and strengthening Europe's innovation base. Future legislative action should therefore rest on a robust evidentiary and legal foundation: one that is durable, proportionate and capable of enabling innovation.

The Draghi report and the Commission's Competitiveness Compass underline the need to close Europe's innovation gap, reduce dependencies, and create the conditions for companies to invest, manufacture, and scale in Europe.

The cumulative impact and coherence of the ongoing legislative reviews must also be considered. While these files may be assessed separately, their effects will converge on the same value chain. Taken together, they will shape our competitiveness, capacity to invest and ability to sustain jobs across Europe.

The decisions taken in Brussels will shape the future of an entire European value chain for years to come. We stand ready to engage constructively with the Commission and contribute our expertise to ensure those decisions are evidence-based, proportionate and supportive of both public health and European competitiveness.

Yours sincerely,

[2] European Court of Auditors, *Combating the illicit tobacco trade in the EU* (September 2026)

[3] https://ec.europa.eu/commission/presscorner/api/files/document/print/en/ip_26_771/IP_26_771_EN.pdf

Associations and Companies



Business Associations

001	ANIEV	Germany
002	Asociația Națională a Comercianților Mici și Mijlocii din România – ANCMMR	Romania
003	Asociatia pentru Combaterea Traficului Ilicit „Viitorul” (ACTIV)	Romania
004	BDTA - Bundesverband Deutscher Tabakwaren	Germany
005	British Polish Chamber of Commerce	Poland
006	Centromarca - Portuguese Association of Branded Products Companies	Portugal
007	Chamber of Commerce and Industry of Slovenia (GZS) and Chamber of Small Business and Trade (PTZ)	Slovenia
008	Croatian Chamber of Economy	Croatia
009	Croatian Employers' Association (HUP)	Croatia
010	Izba Przemysłowo-Handlowa Białystok	Poland
011	Krajowa Izba Gospodarcza	Poland
012	Latvijas Tirgotāju asociācijas (LTA)	Latvia
013	Lewiatan - Business organization	Poland
014	Lietuvos pramonininkų konfederacija (LPK)	Lithuania
015	Lietuvos verslo konfederacija | ICC Lietuva	Lithuania
016	Markenverband e.V.	Germany
017	Organizatiei Patronale a Hotelurilor si Restaurantelor din Romania (HORA)	Romania
018	Podlaski Klub Biznesu	Poland
019	Polish Federation of Trade Unions in the Tobacco Industry	Poland
020	Polska-Izba-Handlu	Poland
021	Pracodawcy RP - business organization	Poland
022	Slovak Association of Commerce	Slovakia
023	Slovak Association of the Branded Products, SZZV	Slovakia
024	Slovenian Chamber of Commerce	Slovenia
025	The Czech Association of Branded Products	Czechia
026	WKO Fachverband für Produkte aus Papier und Karton	Austria
027	WKO Fachverband Gastronomie	Austria
028	Združenje delodajalcev Slovenije – ZDS	Slovenia
029	Związek Pracodawców Business Centre Club	Poland
030	Związek Przedsiębiorców i Pracodawców (ZPP)	Poland

Sector Representatives Associations

031	Asociacion canaria de industriales tabaqueros	Spain
032	Association des fournisseurs de Tabacs á fumer (AFTF)	France
033	Association Française des Industriels du Tabac (AFIT)	France
034	Association of Traditional and Smokeless Tobacco Products, Latvia	Latvia
035	Bundesverband Wasserpfeifentabak e.V.	Germany
036	Cimabel	Belgium
037	Cyprus Vaping Association	Cyprus
038	Der Bundesverband der Tabakwirtschaft und neuartiger Erzeugnisse (BVTE)	Germany
039	Deutscher Zigarettenverband e.V. (DZV)	Germany
040	European Nicotine Pouches Association (ENPA)	Europe
041	European Smoking Tobacco Association	Europe
042	European Rolling Paper Association ERPA	Europe
043	Febeva	Belgium
044	Finnish Nicotine Industry Association – Savuton nikotiiniala ry, Finlands Nikotinbranch rf (SNA)	Finland
045	Greek Association of traders of vaping products (GATVAP)	Greece
046	KSPT – Krajowe Stowarzyszenie Przemysłu Tytoniowego Polish NMA	Poland
047	Luna corporate	Poland
048	Mesa del Tabaco	Spain
049	NTGA (Nacionalinė tabako gamintojų asociacija) - Lithuania NMA	Lithuania
050	Responsible Vaping Ireland	Ireland
051	Svenska Snustillverkarföreningen/Association of Swedish Snus Manufacturers	Sweden
052	Svenska Tobaksleverantorsforenningen	Sweden
053	The Imported Tobacco products Advisory Council (ITPAC)	UK
054	Tobacco Europe AISBL	Europe
055	Tobacco Manufacturers' Advisory Committee (ITMAC)	Ireland
056	Tobaksproducenterne - Danish Tobacco Association	Denmark
057	Tubakatootjate Eesti Assotsiatsioon (estonian NMA)	Estonia
058	Verband des eZigarettenhandels e. V. (VdeH)	Germany
059	VSK	Netherlands

Farmers and Agri-Chain

060	Alliance One	Switzerland
061	Bundesverband Deutscher Tabakpflanzer e.V. (BDT)	Germany
062	Cetarsa	Spain
063	Confagricoltura	Italy
064	Deltafina srl	Italy
065	Federacion nacional de cultivadores de tabaco de espana	Spain
066	Fetratab	Europe
067	Inbeltab	Belgium
068	International Tobacco Growers Association (ITGA)	Global
069	Krupan list - Growers Association	Croatia
070	Magyar Dohánytermelők Országos Szövetsége	Hungary
071	National Tobacco Growers Association - 2010	Bulgaria
072	Organizacion interprofesional del Tabaco de Espana	Spain
073	OZPT - Growers Association Augustow	Poland
074	OZPT - Growers Association Grudziadz	Poland
075	Polski Zwiazek Plantatorow Tytoniu (PZPT)	Poland
076	Produttori Di Tabacco Del Veneto (NewTab)	Italy
077	Produttori Di Tabacco Della Campania (ProTab)	Italy
078	Tabacum - Growers Association	Croatia
079	Taes SL	Spain
080	UNITAB	Europe
081	Universal Leaf Tobacco Company	Global

Product Manufacturers

082	British American Tobacco	Europe
083	HRJ Production OÜ	Estonia
084	Imperial Brands	Europe
085	Joh. Wilh. von Eicken GmbH	Germany
086	Japan Tobacco International	Europe
087	Landewyck	Luxembourg

Product Manufacturers (continued)

088	Philip Morris Benelux	Benelux
089	YOIK Group AB	Sweden

Components and materials supply chain

090	Alchem Europe SA	Luxembourg
091	Alpaci S.à.r.l.	Germany
092	Amcor	US
093	Arethia Services Germany GmbH & Co. KG	Germany
094	Atmos Lab	Greece
095	Beucke & SÖHNE GmbH & Co. KG.	Germany
096	Bilora Innovations GmbH	Germany
097	Cerdia	Germany
098	Chemnovatic	Poland
099	CIMA GmbH	Germany
100	Consumer Packaging Manufacturer Alliance	UK
101	Contraf-Nicotex-Tobacco GmbH (CNT)	Germany
102	Delfortgroup AG	Austria
103	Deutscher Verband der Aromenindustrie e.V. (DVAI)	Germany
104	Elplast	Poland
105	Etiart, S.L.	Spain
106	Ettiketto	Sweden
107	Extraits Vegeteaux et Derives – EVD	France
108	Filtrona	UK / Hungary
109	FK-Feinpapier Kompetenz GmbH	Germany
110	Folien + Druck GmbH	Germany
111	Gizeh	Germany
112	GLATZ Feinpapier	Austria
113	GM Solutions	Spain
114	GPI Frankfurt & Augsburg GmbH	Germany

Components and materials supply chain (continued)

115	Groku Kunststoffe GmbH	Germany
116	H.O.Persiehl (GmbH & Co.) KG	Germany
117	Hertz & Selck GmbH & Co.	Germany
118	Hertz Flavors KG	Germany
119	Innovia	UK
120	INTREX Spółka z ograniczoną odpowiedzialnością	Poland
121	Julius Glatz GmbH	Germany
122	Körber AG	Germany
123	LOGO tape group	Netherlands
124	Mafco Worldwide LLC	France
125	Metalimex a. s.	Czechia
126	Miquel y Costas	Spain
127	MM Group	Austria
128	nd nuschdruck GmbH & Co. KG	Germany
129	Nicobrand	UK
130	Paul Rauschert GmbH & Co. KG	Germany
131	Pujadas	Spain
132	Purilum LLC	US
133	Säuberlin & Pfeiffer SA/MM Packaging	Switzerland
134	Schur Star Systems GmbH	Germany
135	Solve innovative	Austria
136	Swiss Quality Paper AG	Germany
137	SWM	France
138	Symetal Aluminium Foil Industry S.A.	Greece
139	TannPapier GmbH	Austria
140	Tann Germany GmbH	Germany
141	Tatrafan, s.r.o.	Slovakia
142	Tobacco Technology, Inc.	US
143	Zentralverband der deutschen Werbewirtschaft ZAW e.V.	Germany

Retail, wholesale and distribution

144	Agemos - Associazione Nazionale Distributori e Venditori di Tabacco	Italy
145	Algo logistics	Greece
146	AS Prike	Estonia
147	Austrian Tobacco Wholesalers Association (TGHÖ)	Austria
148	Bft Bundesverband Freier Tankstellen und Unabhängiger Deutscher Mineralölhändler e.V.	Germany
149	Bundesverband des Tabakwaren-Einzelhandels e.V. (BTWE)	Germany
150	Confédération Européenne des Détaillants en Tabac (CEDT)	Europe
151	Chatzivasiloglou S.A.	Greece
152	Compania de tabacos del mediterraneo (COMET)	Spain
153	Confédération des buralistes	France
154	Cyprus Convenience Stores Association (SYKADE)	Cyprus
155	DTV Einzelhandelssysteme GmbH & Co. KG	Germany
156	Express Logistics and Distribution Ltd. (ELD)	Bulgaria
157	EX-Trade GmbH & Co. KG	Germany
158	European Tobacco Wholesaler association	Europe
159	FEAL GmbH	Germany
160	GECO, a.s.	Czechia
161	GGT CZ, a.s.	Czechia
162	Gremi d`Estanquers the Catalunya	Spain
163	iNovine	Croatia
164	Intrade Concepts GmbH	Germany
165	Kapnopolis S.A.	Greece
166	Logista	Spain
167	M. Niemeyer GmbH & Co. KG	Germany
168	Magyar Dohány Kiskereskedők Szövetsége - MDKSZ	Hungary
169	Moosmayr Ges.m.b.H.	Austria
170	MV GROUP Distribution LT, UAB	Lithuania
171	National Association of Convenience Stores (NACS)	Global
172	New Association of Kiosk Owners (NESYPE)	Cyprus

Retail, wholesale and distribution (continued)

173	PEAL a.s.	Czechia
174	Periptera News	Greece
175	Perstablo	Belgium
176	PressMedia, spol. s.r.o.	Czechia
177	Retailers Against Smuggling	Ireland
178	SIA MV Latvia	Latvia
179	SMD Logistics	Sweden
180	SmokerStore GmbH	Germany
181	Steam-Store	Germany
182	Tabacos GmbH	Germany
183	Tabaknatie	Belgium
184	Tobacco DC, s.r.o.	Czechia
185	Tobacco Import LTD	Bulgaria
186	Tobacco Trade	Bulgaria
187	Top Tank s.r.o.	Czechia
188	Trade and Logistics Association of Croatia	Croatia
189	UKO Microshops AG	Austria
190	Union de asociaciones de estanqueros de espana	Spain
191	UNION OF TOBACCONISTS	Greece
192	UNITI Bundesverband EnergieMittelstand e.V.	Germany
193	Unternehmensgruppe Dr. Eckert GmbH	Germany
194	VALMONT CR, spol. s r.o.	Czechia
195	Vapor ExMachina GmbH & Co. KG	Germany
196	VELTA Free Shop s.r.o	Czechia
197	VELTA PLUS EU, s.r.o.	Czechia
198	WKO Bundesgremium der Tabaktrafikanten	Austria
199	WKO Fachverband Enegiehandel (Tankstellen)	Austria
200	Wolsdorff Tobacco GmbH	Germany
201	Zentralverband des Tankstellengewerbes e.V. (ZTG)	Germany