

Work Package 4 Sustainability and
Cooperation across Europe

WP4 D4.1
A report of Policy dialogues
on sustainability of JATC
2 actions and possible
contributions to Europe's
Beating Cancer Plan

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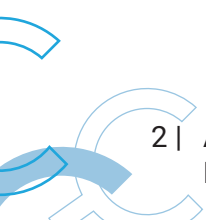


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Introduction

Policy dialogues on Sustainability and Europe's beating cancer plan

An internal workshop was held with JATC 2 Work Package leaders on the 29th of February 2024. This was specifically to provide a dedicated opportunity for dialogue with the Work Package (WP) leaders at a point in the Joint Action where the most valuable insights, perspectives and recommendations could be gathered, on sustainability and links to Europe's Beating Cancer Plan. Importantly, it provided the information to fulfil Deliverable 4.1 *Policy dialogues on sustainability of JATC 2 actions and possible contribution to Europe's Beating Cancer Plan*.

It also followed the receipt of questionnaires in tabular format from WP leaders on this topic. These were issued earlier by WP4, within the objective 4.2 and, the basis of the roadmap in one-pager formats of the sustainability plan of WP activities included in the next Deliverable 4.2 *Sustainability plan, policies and scenarios for long-term sustainability*. These were spoken to by WP leaders in this workshop and are contained in the sustainability plan.

In order to capture a rich record of the discussions in this workshop, these were gathered from three related and complementary perspectives, with each member of the HSE team noting the related discussions and key points. Below, are grouped the related notes into three sections, based upon what was 'heard' as key points coming out of the discussions which followed the WP leaders presentations. They are not a verbatim account and given the nature of the workshop analysis some of the points made overlap in places.

The perspectives were as follows:

1. Sustainability
2. JATC 2 actions and possible contributions to Europe's Beating Cancer plan
3. Enablers/ barriers

1. Sustainability

Work Package 5: EU Common Entry Gate (EU-CEG) data and laboratory capacity

A potential JATC 3 or a similar project including tobacco control is essential to ensure the consistent implementation of any revisions to the TPD (e.g. TPD 3).

The use of the CIRCABC platform to build the knowledge hub base should be considered.

There is also the need to keep an updated contacts list to facilitate sharing of knowledge.

It was also suggested frequent EU meetings should be held and a person within the EU should be assigned the responsibility to coordinate the meetings.

There is a need to consider the possibility to centralise management of EU-CEG data e.g. through European Food Safety Authority (EFSA) or European Chemical Agency (ECHA). A server is needed to host the EU-CEG data for instance to use ECHA. To assist in the establishment of this centralised management of the EU-CEG, it was suggested refer to existing frameworks within Europe for a similar approach to be adopted for tobacco control e.g. Food law, Registration, Evaluation, Authorisation and Restriction (REACH), Classification Labelling and Packaging (CLP).

There is a need for national experts to look at EU-CEG data and use the data more efficiently. The current software used in EU-CEG is not useful in assessing the ingredients data, thus needing a better ability to extract data for each Member State at national level to utilise the EU-CEG data. Each member state must have access to this data.

There is a need to establish a European Reference Laboratory for each category similar to what is in place in Europe for animal feed and foods. Tobacco Control needs reference labs for Tar

Nicotine Carbon Monoxide (TNCO) in cigarettes, non-targeted analysis of e-liquid ingredients. There is a need for funding from industry to fund the above. Funds could be raised from the notifications on EU-CEG.

Regarding laboratory work, a similar approach could be used, akin to novel food approvals, such as the model where DG Santé and EFSA operate independently.

Key points:

1. A person in EU should be appointed to coordinate meetings and knowledge sharing on TPD.
2. There is a need to set up and coordinate European Reference labs similar to framework to food law, REACH and CLP.
3. Regarding the EU-CEG, it is necessary to centralise the storage and maintenance of data and the database, similar to the system used by the European Commission Agency (ECA).

Work Package 6: Enforcement of Tobacco Product Regulation

Knowledge sharing is the key to effective enforcement of the TPD legislation across Europe. There are no answers yet from this WP on means of funding to ensure sustainability. However, knowledge hub meetings need to be maintained to ensure the sharing of knowledge amongst Member States.

Key points:

4. There is a need to maintain a contacts list for circulation of knowledge and information.
5. There is a need to establish the Administrative Cooperation groups (AdCo) groups for tobacco (these are provided for in the market surveillance directive EU 2019/1020). It was suggested the chair of the group could be alternated between each Member State, and it should be mandatory to partake in the AdCo group. The EU needs to fund each Member State attendance at the AdCo in person meetings.
6. A knowledge Hub could be maintained by each MS to provide relevant information for CIRCABC.

Work Package 7: E-cigarettes and novel tobacco products evaluation

There is a need to continue the sharing of information amongst Member States, e.g. facts sheets and information sharing on the JATC website. Currently there is no funding available for activities after the JATC 2 deadline, however, this WP is currently developing information material to be uploaded on the JATC website.

Regulatory bodies need to develop links with Non-Government Organisations (NGOs) to spread the regulatory message and to influence policy makers and those developing regulations in each Member State, e.g. risks associated with novel tobacco products.

Regarding sustainability, this WP stated that is very important to maintain the networks established through JATC 2 work. In future projects, WP4 should include the participation of all the other WP leaders to ensure the Sustainability Plan implementation.

Key points:

7. Enforcement of TPD needs to be consistent across all Member States.
8. There is a need to develop a means of sharing knowledge after JATC 2, e.g. email or another platform.

9. The EU CEG contains a large amount of information. There needs to be developed an easier means of analysing data. There is a need to improve the quality of data entered by industry. This WP needs to link into the recommendations of WP5.
10. Product Regulation – e.g., product ingredients – revisions of the TPD need to be more specific. The current Tobacco Product Directive (TPD) wording relating to ingredients is very vague. The work done by the Netherlands and Denmark on ingredients analysis needs to be developed.
11. The review of the TPD needs to consider the collection and reporting of data relating to adverse health effects. TPD3 should require manufacturers to include on product packaging a link to a website where users can report health effects. The current system of manufacturer/importer reporting is not effective.

Work Package 8: Smoke-free environments and tobacco advertising, promotion, and sponsorship (TAPS) legislation in Europe

The ICO (Spain) server will maintain data from Work Package 8. However, there are concerns about the future maintenance of the JATC website.

WP 8 will coordinate with WP 6 on knowledge sharing and will rely on the contacts list maintained by WP 6 as circulation list to share information.

The following points were discussed during the WP leader's feedback:

- All relevant information/materials will be available on the ICO website, which is not dependent on JATC funding to be maintained.
- The WP will provide ongoing information on strategies that Member States could use to assist local campaigns and funding for smoking cessation and Smoke and Aerosol Free Environments (SAFE) environments.
- For the adoption of SAFE, there is a need to establish a strong team during the implementation stage.
- This WP will work with WP2 on dissemination of information and strategies.

Key points:

12. This WP will establish a scientific journal with open access.
13. The ICO server will store materials pertaining to WP8. There are uncertainties about the future maintenance of the JATC website.

Work Package 9: Tobacco endgame strategy

Key points:

14. Maintaining connections with WP 2, 4, and 6 is important to effectively reach the target audience. Therefore, it's essential to keep an updated contact list for sharing information on tobacco endgame goals and forward-looking measures.
15. Even after the project end, it is important to promote the online toolkit, the WP9 deliverable that compiles essential information of the concept and provides examples of potential best practice case studies and evidence to allow Member States to start moving towards adopting and implementing tobacco endgame goals and forward-looking measures.
16. The online toolkit will be maintained for next 5 years on the *Finnish Institute for Health and Welfare* (THL) server and with a specific domain www.tobaccoendgametoolkit.eu.

Work Package 2: Dissemination

Dissemination of materials produced by JACT is required to target audiences via the European Network for Smoking and Tobacco Prevention (ENSP).

Key points:

17. The National Public Health Organisation ensured that the JATC website will continue for thirteen months from end of JATC 2, thus the EU after this needs to provide funding for website. NPHO is currently trying to secure funding nationally for another 3 years.
18. JATC material to be provided through CIRCABC or EIRCA.
19. The Layman version of the final report to disseminate materials/policy after JATC2.
20. Wider collaboration is needed with European Respiratory Network, ENSP for greater dissemination of material.
21. The best option for sustainability is JATC 3. In addition, to include tobacco free Europe as well as the current JATC 2 focus on tobacco products.

Work Package 3: Evaluation

Key points:

22. A JATC 3 must be established and sustainability considered by all WPs.
23. Establish Knowledge Hub meetings to share information.
24. Knowledge sharing platforms must be maintained e.g. JATC 2 website.
25. This WP will produce three documents for the website to contribute to sustainability of JATC.
26. Establish a reference Laboratory in Europe for product ingredients.
27. There is a need to centralise the maintenance of EU-CEG and experts to review the industry data.
28. Establish an AdCo group for tobacco control.
29. Maintain a contact lists and persons at European level to coordinate maintenance of the list and setting of meetings etc.
30. Maintenance of existing JATC website to store data or use CIRCABC.
31. Need to consider how article 5.3 can be more proactively applied.

2. JATC 2 actions and possible contributions to Europe's Beating Cancer plan

To sustain the existing knowledge and network beyond the project's completion, it is proposed to establish it as a permanent network with shared responsibilities. Participants would rotate the organization of knowledge hub meetings and maintenance of components like archives and forums, ensuring continuity. The focus in the coming months should be on finalising a voluntary agreement among partners to continue these activities before the TPD revision. Additionally, laboratory networks are crucial for Europe, with discussions on allocating resources to certain laboratories and extending them to other countries. Discussion includes forming a voluntary expert group of enforcement practitioners, publishing scientific recommendations for regulators, leveraging NGO networks to raise awareness of e-cigarette risks, and clarifying the TPD interpretation.

Key Threats:

- Delay in updating the recommendation on smoke-free environments and revision of the tobacco directive, jeopardizing the continuity of joint action activities.
- Industry involvement and interference, with concerns about a knowledge gap if revisions are delayed.

- Challenges in maintaining smoke and aerosol-free environments, interpreting and using EU-CEG data on toxic emissions, and the lack of a European-wide structured sampling program.
- Difficulties in assessing literature on health risks, regulating specific ingredients without detailed TPD guidelines, and gathering reliable data on adverse health effects from industry sources.
- Inconsistent enforcement standards among regulators and a lack of secure funding for the sustainability of JATC 2 work.

Contributions to Europe's Beating Cancer Plan:

32. Improve the assessment of ingredients, extend taxation to novel tobacco products, and tackle tobacco advertising, promotion, and sponsorship on the internet and social media.
33. Propose updating the recommendation on smoke-free environments to cover emerging products, such as e-cigarettes and heated tobacco products, and expand smoke-free environments, including outdoor spaces and schools' playgrounds.
34. Facilitate knowledge sharing between EU member states regarding research, regulation, and enforcement of nicotine and tobacco products to achieve the general and overall objectives of the Europe's Beating Cancer Plan.
35. Enhance knowledge about risk factors for developing cancer, and about harmful and carcinogenic substances in these products.
36. Establish a tobacco control AdCo group in line with Market Surveillance Regulations Article 32.
37. Raise awareness of the Tobacco-Free Generation goal (<5% by 2040) set in the EU Cancer Plan, and provide easy-to-access information that countries can utilize to take national actions in line with the regional goal to advance tobacco endgame goals and forward-looking measures.

3. Enablers and barriers

Enablers

The feedback from Work Package 5 clearly indicated that there is a strong foundation for the use of data provided to the European common entry gate (EU-CEG). In addition, the information submitted has a clear connection to the objective to reduce cancer risk via exposure to carcinogenic, mutagenic, reprotoxic (CMR) additives and ingredients. It was suggested that data should be centralised/connected to the European chemical database hosted by ECHA. It was also suggested that a network of reference Laboratories could be set up under the EC/JRC model with a specific budget but this would need European legal framework to facilitate this proposal. This discussion highlighted that there are structures within Europe that can be developed /expanded/ joined to other European initiatives. Work Package 6 proposed that one enabler might be that knowledge hubs are voluntarily rotated between partners or put on a more permanent footing through the AdCo provisions of the market surveillance directive. Work Package 7 emphasized the considerable amount of publications they had been successful in producing and that add to the knowledge of known risk factors but the discussion underscored the need for funding on a more structured basis. Colleagues in Work Package 8 outlined the various position papers etc. they had produced and the on-going availability on the ICO website with the possible ability to add additional material over time. Work Package 9 focused on the toolkit that has been developed and successful discussions at the recent Conference of the Parties, in particular in relation to article 2.1 and the establishment of a group prior to the next conference of the Parties. Work Package 7 highlighted the lab networks under WHO tob lab net and platforms such as CIRCABC, which give a broader REACH and forum for questions particularly on emerging products. Work Package 2 emphasized the importance of harmonized dissemination and the discussion revolved around the importance of this as the joint action comes to an end. Work Package 3 provided useful insights and analysis as to how best evaluate Joint Action objectives and deliverables.

Key points:

38. There is a foundation within notification procedures to the portal, laboratory networks and the joint working across the work packages to develop a more solid base for Tobacco Control going forward, possibly linked to the European chemicals database and the reference laboratory network.
39. There needs to be harmonized dissemination of the outputs and materials from JATC 2 including the WP9 toolkit.
40. Collaborative groups need to be fostered and developed including the establishment of an AdCo.

Barriers

Barriers identified include delays in revising key directives as highlighted by WP 5, ongoing challenges with secure access to CIRCABC, and underutilization of fee provisions within the tobacco products directive. Concerns related to Article 5.3 include the absence of a centralised hub for queries and a separate hub for products notifications. WP 6 emphasised the absence of a formal ongoing network or AdCo as an additional barrier, along with limited interest and availability of time and resources. WP 7 pointed out varying enforcement practices across countries and highlighted financial constraints. Issues such as tobacco industry interference, problematic wording in directive provisions, and challenges with adverse effects notification systems were also discussed. Overall, inadequate countries capacity and funding are significant barriers.

Key points:

41. Several barriers were identified during the discussions, which require further investigation and the development of plans to overcome them. Of immediate concern is the completion of JATC 2 without a clear follow-up or connection to another Joint Action.

Conclusion

The discussions held suggest that in the JATC 2 Sustainability Plan, emphasis needs to be made on the need to build upon what has been achieved in JATC 2 and what is already in existence and working well within European Member States. Notably, this includes utilising the chemicals data available through EU-CEG, continuing knowledge sharing, facilitating laboratory networks, launching an AdCo and investing in tobacco control in terms of resources, training and collaborative working including further Joint Action initiatives.