
Reaccreditation report of NGO observers to COP11

Survey response 1

Date submitted
2025-02-28 14:50:47

A. Contact details

A1. Name of organization
Smoke Free Partnership
A6. Website of organization
https://www.smokefreepartnership.eu/

B. General information

B1. Please indicate if your organization would like to retain its status as observer to the Conference of the Parties
Yes
B2. Does your organization's mission statement specifically refer to tobacco control?
Yes
B3. If yes, please specify:
SFP's mission is the effective implementation of the WHO Framework Convention on Tobacco Control (FCTC). To this end, the SFP works with decision makers to ensure that tobacco control receives adequate political attention at EU level and to promote tobacco control information and policy research at EU and national level, in collaboration with other EU health organizations and tobacco control networks. It also aims to ensure FCTC implementation globally and is working to release EU funding for tobacco control to counter poverty in developing countries.
B4. Does your organization have regional branch(es) to enhance activities in different regions or groups of countries?
Yes

B5. If yes, please provide details
<p>The SFP Coalition is a network comprising of independent EU and national advocacy organisations with technical expertise in tobacco control policy. Led by SFP, Coalition partners work together to promote and support smoking prevention through the development of advocacy towards EU tobacco control policies through the development and implementation of the FCTC, its protocols and guidelines.</p> <p>The main priority of the SFP Coalition is to promote forward-looking and evidence-based tobacco control legislation in order to implement the FCTC in specific and cross-cutting policy areas, with an overarching goal of improving health and reducing health inequalities among EU citizens.</p> <p>The SFP Coalition currently has 57 partners across Europe including SFP Main partners, Associate partners and Advocacy partners. The Coalition communicates regularly and meets annually to discuss and agree advocacy priorities at EU and national level on specific areas.</p> <p>SFP Coalition partners recognise the fundamental importance of strengthening cooperation on tobacco control policy in the EU through better communication of our actions and capacity-building regarding specific areas of the FCTC at European and national level.</p> <p>Additionally, SFP serves as the Regional Coordinator for Europe for the Global Alliance for Tobacco Control (GATC). In this role, it effectively conveys GATC's perspective to the European Community.</p> <p>The main priority of the SFP Coalition is to promote forward-looking and evidence-based tobacco control legislation in order to implement the FCTC in specific and cross-cutting policy areas, with an overarching goal of improving health and reducing health inequalities among EU citizens.</p> <p>The SFP Coalition currently has 57 partners across Europe including SFP Main partners, Associate partners and Advocacy partners. The Coalition communicates regularly and meets annually to discuss and agree advocacy priorities at EU and national level on specific areas.</p> <p>SFP Coalition partners recognise the fundamental importance of strengthening cooperation on tobacco control policy in the EU through better communication of our actions and capacity-building regarding specific areas of the FCTC at European and national level.</p>
B6. Does your organization regularly convene meetings or conferences for its membership?
Yes
B7. If yes, is tobacco control covered in these meetings?
Yes
B8. If yes, please provide details
<p>SFP's coalition partners are non-profit organizations working mostly on tobacco control at national level or cancer prevention at EU and national level. Through regular meetings and quarterly calls, SFP actively engages with coalition partners to foster collaboration and strengthen tobacco control efforts across Europe. During these exchanges, SFP provides updates on the implementation of tobacco control measures at the EU level, while coalition partners share valuable insights, best practices, and national developments. These discussions also serve as a platform to identify challenges, address obstacles at the national level, and explore joint initiatives that enhance the implementation of the FCTC, ensuring a more coordinated and impactful approach to tobacco control.</p> <p>Additionally, in 2023, SFP hosted a Workshop on Tobacco Taxation in Brussels, focusing on the revision of the Tobacco Taxation Directive (TTD) and its impact on health and the economy. Experts, including economists and a communications specialist, shared insights through case studies and interactive discussions on effective advocacy strategies for tobacco tax policies at both national and EU levels. This event specifically links to article 6 of the WHO FCTC.</p> <p>In 2024, SFP organized a one-day workshop on Communication Campaigns to strengthen coalition partners' skills in executing effective tobacco control campaigns. The workshop focused on developing impactful narratives, creating media kits, and tailoring communication strategies to the political landscape. Participants learned how to engage key audiences, including policymakers, media, and youth, while covering all stages of a campaign, from framing messages to content creation, distribution, and impact assessment. This event directly links to articles 8 and 12 of the WHO FCTC.</p>

C. Participation in WHO FCTC meetings and contributions to other tobacco control related events

<p>C1. Please indicate the meetings organized by the Convention Secretariat at which your organization was represented (sessions of the Conference of the Parties, meetings of intersessional groups, NGO meetings, etc.)</p> <p>In 2023</p> <ul style="list-style-type: none"> • <input checked="" type="checkbox"/> Preparatory euro-regional meeting for WHO COP10 • <input checked="" type="checkbox"/> Informal NGO meeting organized by the Secretariat <p>In 2024</p> <ul style="list-style-type: none"> • <input checked="" type="checkbox"/> Informal NGO meeting organized by the Secretariat • <input checked="" type="checkbox"/> Conference of Parties to the WHO FCTC (COP10)
<p>C2. Please list any other meetings or conferences with a focus on tobacco control attended by your organization</p> <p>In 2023</p> <ul style="list-style-type: none"> • <input checked="" type="checkbox"/> Intergovernmental Negotiations for the Plastics Treaty (Plastic Pollution INC-5) – France • <input checked="" type="checkbox"/> European Tobacco for Health Conference – Madrid, Spain • <input checked="" type="checkbox"/> Conference by German Cancer Research Centre – Heidelberg, Germany • <input checked="" type="checkbox"/> ENSP Annual Conference – Florence, Italy • <input checked="" type="checkbox"/> Launch of the Global Industry Interference Index - online <p>In 2024</p> <ul style="list-style-type: none"> • <input checked="" type="checkbox"/> World Cancer Congress – Geneva, Switzerland • <input checked="" type="checkbox"/> Intergovernmental Negotiations for the Plastics Treaty (Plastic Pollution INC-5) – Busan, South Korea • <input checked="" type="checkbox"/> ICO Symposium – Barcelona, Spain • <input checked="" type="checkbox"/> ENSP Annual Conference – Athens, Greece • <input checked="" type="checkbox"/> High level Conference on the future of EU Health Union by Belgian Presidency – Brussels, Belgium • <input checked="" type="checkbox"/> Conference Challenging Big Industry Narratives – Ljubljana, Slovenia • <input checked="" type="checkbox"/> GATC COP/MOP Townhall – online • <input checked="" type="checkbox"/> Conference by JATC 2 – Brussels, Belgium

D. Your organization's activities to support implementation of the WHO FCTC

<p>D1. Article 5 (General obligations)?</p> <p>Yes</p>
<p>D2. If yes, please provide details</p> <p>Regarding internal affairs, the SFP Board conducted an independent and thorough assessment of the evidence relating to the reported contacts between Deborah Arnott, former Chief Executive of ASH (UK) (and a current member of the SFP Board in a personal capacity) and JUUL between June 2017 and March 2019, to determine whether these represented a breach of SFP's Articles of Association and/or behaviour incompatible with Deborah Arnott's responsibilities as a Board Member of SFP.</p> <p>Following its assessment, the SFP Board concluded that the evidence did not support the conclusion of any conflict of interest, malicious intent or inconsistency with SFP's mission on behalf of Deborah Arnott. However, the SFP Board identified errors of judgement on the part of Deborah Arnott concerning the sufficiency of disclosure of her contacts with JUUL during the specified period. Deborah Arnott accepted this decision and has offered her resignation from the SFP Board, which has been regrettably accepted.</p> <p>In conclusion, the SFP Board is actively revising its Conflict of Interest Policies to strengthen them and prevent similar cases in the future. This effort includes aligning with updates to the GATC's Conflict of Interest Policies and developing a robust, confidential disclosure process.</p> <p>Furthermore, SFP actively engages with EU policymakers to reinforce their obligations under WHO FCTC Article 5.3, particularly regarding transparency. As a partner of the Global Center for Good Governance in Tobacco Control (GGTC), SFP publishes the European Regional Tobacco Interference Index biennially, with the most recent report released in 2023. SFP also analyzes the EU Transparency Register annually to evaluate industry influence and promote awareness of Article 5.3. Each year, SFP reviews the register to monitor tobacco industry lobbying expenditures and meetings with MEPs.</p> <p>SFP also condemns political events funded by the tobacco industry and urges policymakers to abstain from participating. While the European Commission's Directorates for Taxation and Health uphold Article 5.3 by sharing meeting minutes, SFP continues to advocate for the full implementation of this transparency measure across the entire Commission.</p>
<p>D3. Article 6 (Price and tax measures to reduce demand for tobacco)?</p> <p>Yes</p>

D4. If yes, please provide details
<p>SFP has been actively engaged in the revision of the EU Tobacco Taxation Directive, which was initially expected to be released in 2023, however this is still not the case. Throughout 2023 and into 2024, SFP has conducted regular meetings with EU policymakers and national tax attachés to advocate for stronger tobacco tax measures. In addition to its 2021 position paper on tobacco taxes and the updated advocacy toolkit on the EU Tobacco Tax Directive, SFP has continued to provide coalition partners with updated resources and strategic guidance.</p> <p>SFP collaborated with tax experts to develop a comprehensive model illustrating potential revenues, changes in smoking prevalence, and the tobacco industry's profits under different tax increase scenarios. Once completed, SFP actively disseminated this work, using the model as a key advocacy tool to engage with EU policymakers and highlight the urgent need to raise tobacco taxes as a crucial public health and fiscal measure.</p> <p>In 2023, SFP conducted a Workshop on Tobacco Taxation in Brussels. The event focused on the evaluation and implications of tobacco taxation, specifically within the context of the TTD and its crucial revision. It featured a diverse lineup of experts, including economists, who presented case studies and analyses related to tobacco taxation's effects on health and the economy. Additionally, a communications expert provided insights on persuasive messaging in support of tobacco taxation. The session included interactive group discussions to explore national and EU-level strategies to effectively advocate for tobacco tax policies.</p>
D5. Article 8 (Protection from exposure to tobacco smoke)?
Yes
D6. If yes, please provide details
<p>SFP's external consultant Luk Joossens works on the Tobacco Control Scale (TCS) which evaluates and ranks European countries based on their implementation of key tobacco policies including smoke-free environments, aligning with Article 8 of the WHO FCTC, which mandates protection from exposure to tobacco smoke. The TCS assesses national policies on smoking bans in public places, workplaces, and public transport, highlighting best practices and areas needing improvement. By tracking progress and encouraging stricter enforcement, the TCS helps ensure that countries adopt comprehensive smoke-free laws, protecting non-smokers from the harmful effects of second-hand smoke and promoting healthier public spaces.</p> <p>In September 2024, a proposal for Council Recommendations on Smoke- and Aerosol-Free Environments was launched. SFP analysed the proposal put forward and came to specific conclusions that the proposal aligned with the recommendations of article 8 of the WHO FCTC. SFP supported the European Commission's 2024 proposal to expand smoke-free policies to include heated tobacco and e-cigarettes in public and outdoor spaces and encouraged Member States to adopt the proposal. After the successful adoption of the proposal at Council, SFP sent out a press release congratulating the Council on this decision.</p> <p>SFP's published Response to the European Commission's Call for Evidence on the Legislative Framework for Tobacco Control outlines key recommendations aligned with Article 8. The policy document advocates for comprehensive smoking bans in all indoor public places, workplaces, and public transport, with no exemptions, while also extending these protections to outdoor areas frequented by children, such as playgrounds and school premises. It highlights the need for stronger enforcement mechanisms, including stricter penalties and public awareness campaigns to ensure compliance. SFP also calls for harmonized smoke-free regulations across the EU, preventing disparities in protection levels and closing loopholes that allow certain establishments to bypass restrictions. Additionally, the response urges the inclusion of heated tobacco products (HTPs), e-cigarettes, and other novel products under smoke-free policies, preventing the renormalization of smoking behaviours.</p>
D7. Article 9 (Regulation of the contents of tobacco product) and/or Article 10 (Regulation of tobacco product disclosures)?
Yes
D8. If yes, please provide details
<p>In 2024, SFP published its position paper on the Revision of the EU Tobacco Products Directive, including key recommendations related to the regulation of tobacco product contents (Article 9) and tobacco product disclosures (Article 10) of the WHO FCTC. The paper calls for an extension of the ban on characterizing flavours, ensuring that all flavours are prohibited in all tobacco and related products, including electronic cigarettes. This measure seeks to eliminate current exceptions and align with Article 114(3) of the Treaty on the Functioning of the European Union, which mandates a high level of health protection across Member States, preventing disparities in regulation.</p> <p>For Member States that choose not to ban these products outright, the position paper recommends stricter regulation of non-medicinal nicotine products and nicotine pouches, in line with FCTC/COP/10/79. These measures include:</p> <ul style="list-style-type: none"> • <input checked="" type="checkbox"/> Regulating non-therapeutic nicotine products in the same manner as similar products in terms of appearance, content, and use. • <input checked="" type="checkbox"/> Ensuring that nicotine pouches are not classified as pharmaceutical products unless they have undergone stringent pharmaceutical licensing as nicotine replacement therapies, following approval by the appropriate national regulatory authority. • <input checked="" type="checkbox"/> Minimizing youth access, appeal, and initiation by preventing all forms of marketing for nicotine pouches and implementing strict regulations to limit their availability to young people. <p>By reinforcing content regulation and disclosure requirements, these recommendations aim to strengthen consumer protection, close regulatory loopholes, and reduce the attractiveness of novel tobacco and nicotine products, particularly among young people.</p>

D9. Article 11 (Packaging and labelling of tobacco products)?

Yes

D10. If yes, please provide details

In SFP's published position paper in 2024 on the revision of the EU Tobacco Taxation Directive, we incorporated key recommendations related to the packaging and labelling of tobacco products, in line with Article 11 of the WHO FCTC. The paper advocates for mandatory standardized plain packaging for all tobacco and related products, ensuring a short transition period while following global best practices. This measure aims to reduce market distortions caused by disparities among Member States and uphold the high level of health protection mandated by Article 114(3) of the Treaty on the Functioning of the European Union.

The position paper further calls for full harmonization of packaging and labelling regulations across all tobacco products and devices, eliminating the distinction between smoking and smokeless tobacco products. To strengthen labelling rules, SFP recommends increasing graphic health warnings from 65% to at least 80%, covering both the front and back of all tobacco product packaging. The proposal also underscores the importance of regularly rotating graphic warnings and requiring text warnings on cigarettes, roll-your-own tobacco, cigars, cigarillos, heated tobacco products, and their associated devices.

To ensure the proper functioning of the internal market and enhanced health protections, SFP urges the EU to align with the most ambitious legislations promoted by Member States. The recommendations include introducing graphic health warnings on devices used with heated tobacco products and strengthening packaging and labelling requirements for e-cigarettes and e-liquids. This would involve establishing strict, uniform colour schemes and letter types to reduce product appeal, particularly among youth and non-smokers.

D11. Article 12 (Education, communication, training and public awareness)?

Yes

D12. If yes, please provide details

SFP conducted a Workshop on Tobacco Taxation in Brussels, contributing to the education, communication, training, and public awareness objectives outlined in WHO FCTC Article 12. The event focused on the evaluation and implications of tobacco taxation, particularly within the context of the TTD and its crucial revision. It featured a diverse lineup of experts, including economists, who presented case studies and analyses on the impact of tobacco taxation on health and the economy. Additionally, a communications expert provided insights on persuasive messaging in support of tobacco taxation. The session included interactive group discussions to explore national and EU-level strategies for effectively advocating tobacco tax policies.

D13. Article 13 (Tobacco advertising, promotion and sponsorship)?

Yes

D14. If yes, please provide details

SFP's external consultant Luk Joossens works on the Tobacco Control Scale (TCS) which evaluates and ranks European countries based on their implementation of key tobacco control policies, including restrictions on tobacco advertising, promotion, and sponsorship (TAPS)—a core focus of Article 13. By assessing national regulations on advertising bans, sponsorship restrictions, and enforcement measures, the TCS highlights disparities in tobacco control efforts and encourages stronger policies to eliminate tobacco industry influence. This work supports the comprehensive ban on TAPS recommended by Article 13, ensuring that countries adopt stricter measures to prevent the promotion of tobacco products and protect public health.

SFP published a policy document that provides recommendations on strengthening EU tobacco control measures entitled "Smoke-Free Partnership Response to the European Commission's Call for Evidence on the Legislative Framework for Tobacco Control". It focuses on the Tobacco Advertising Directive (TAD) and the Tobacco Products Directive (TPD), advocating for stricter regulations on tobacco advertising, promotion, sponsorship, and product regulation.

D15. Article 14 (Demand reduction measures concerning tobacco dependence and cessation)

No

D17. Article 15 (Illicit trade in tobacco products)?

Yes

D18. If yes, please provide details
<p>SFP organised two side events at MOP to raise awareness among the Parties to the FCTC Protocol about the dangers of collaborating with the tobacco industry except when absolutely necessary, emphasizing the importance of respecting Article 5.3 of the WHO FCTC and Article 8 of the Protocol.</p> <p>SFP's position paper on the Revision of the EU Tobacco Products Directive (TPD) calls for strengthening the EU's tracking and tracing system to combat illicit trade, in line with Article 15 of the WHO FCTC. To protect public policy from tobacco industry interference, as required by Article 5.3, the paper urges the removal of industry involvement in tracking and tracing under Article 15(8) of the TPD, transferring responsibility for appointing data storage providers and auditors to Member States or the European Commission.</p> <p>To enhance transparency and accountability, SFP recommends publishing audit reports, auditor names, and an annual report on the system's effectiveness. Other key recommendations include:</p> <ul style="list-style-type: none"> • <input checked="" type="checkbox"/> Strengthening audit processes to ensure secure generation of unique identifiers. • <input checked="" type="checkbox"/> Enhancing independence criteria for data storage providers and tracking companies. • <input checked="" type="checkbox"/> Extending tracking and tracing to raw tobacco, preventing illegal supply to factories. • <input checked="" type="checkbox"/> Limiting unique identifier codes, aligning with Article 7 of the WHO FCTC Protocol, to prevent over-supply by the tobacco industry. • <input checked="" type="checkbox"/> Expanding the system's scope to include e-cigarettes, heated tobacco products, and transit tobacco shipments.
D19. Article 16 (Sales to and by minors)?
Yes
D20. If yes, please provide details
<p>In line with Article 16 of the WHO FCTC (Sales to and by Minors), SFP's position paper on the Revision of the EU Tobacco Products Directive (TPD) urges Member States to ban the sale and delivery of tobacco products to individuals born on or after 1 January 2012, with the goal of achieving a tobacco-free generation by 2040. Given that young people who start using tobacco are more likely to become lifelong smokers, targeting youth prevention is critical to reducing smoking rates across Europe.</p> <p>The European Union has positioned itself as a global leader in public health protection, introducing an increasing number of EU-wide initiatives aimed at strengthening tobacco control. Preventing youth from initiating tobacco use must remain a priority, as it is one of the most effective long-term strategies to lower smoking prevalence. Encouraging a tobacco-free generation policy would solidify the EU's role as a global frontrunner in tobacco control, setting a precedent for other regions and reinforcing its commitment to public health and youth protection.</p>
D21. Article 17 (Provision of support for economically viable alternative activities) and/or Article 18 (Protection of the environment and the health of persons)?
Yes
D22. If yes, please provide details
<p>SFP actively participated in INC-5, primarily engaging in discussions with EU representatives. While limited progress was made on the Single-Use Plastics (SUP) Directive, the broader directive addresses plastic pollution reduction through measures such as product bans, extended producer responsibility (EPR), and waste management. The INC-5 Draft Zero, which introduces legally binding global measures, has the potential to complement and strengthen the regional approach of the SUP Directive within the European framework.</p>
D23. Article 19 (Liability)?
No
D25. Article 20 (Research, surveillance and exchange of information)?
Yes
D26. If yes, please provide details
<p>The Smoke-Free Partnership (SFP) actively contributes to research, surveillance, and the exchange of information, in alignment with Article 20 of the WHO FCTC. SFP develops infographics and visual materials based on key data sources, such as the Eurobarometer, to simplify complex information and make it more accessible to policymakers and stakeholders. Additionally, the Tobacco Control Scale (TCS) serves as a critical surveillance tool, assessing and comparing tobacco control policies across European countries, providing valuable insights into progress and areas for improvement.</p> <p>SFP also plays a key role in facilitating research and information exchange by producing policy briefs and research papers, conducted by its affiliated experts on various tobacco control topics like tobacco taxation as an example. These resources ensure that scientific evidence and best practices are widely disseminated, supporting informed decision-making and strengthening tobacco control policies at both national and EU levels. By promoting transparency, evidence-based policymaking, and knowledge-sharing, SFP advances the objectives of Article 20, reinforcing the importance of continuous research and international collaboration in the fight against tobacco use.</p>

D27. Article 22 (Cooperation in the scientific, technical and legal fields and provision of related expertise)?

No

E. Other relevant activities to support the work of the WHO FCTC

E1. Please provide any other relevant information

After COP10 and MOP3, SFP sent thank-you letters to the Belgian Presidency and prepared a brief on key lessons learned, which was shared with key stakeholders. Both before and after COP, SFP engaged with countries holding the EU Presidency—Spain, Belgium, Hungary, and Denmark—by sharing GATC's position on draft decisions beforehand and providing insights from a civil society perspective afterward.

During SFP's in-person Coalition meetings in 2023 and 2024, updates were presented to partners on the adopted COP and MOP decisions, highlighting key obstacles faced. Additionally, SFP engaged with Euro-region Parties to inform and clarify GATC's stance on draft decisions.

As the Euro-regional lead for GATC, SFP played a crucial role in ensuring timely coordination and strategic advocacy efforts.

E2. Please attach any other relevant file(s)

[{"title":"Merged PDF of all mentioned reports","comment":"The following PDF contains: Tobacco Control Scale Report, SFP Position Paper on TPD, Response to recommendation and Analysis of smoke free environment","size":6041.6943359375,"name":"Merged-PDFs.pdf","filename":"fu_dst48n6zd3nxn42","ext":"pdf" }]

filecount - E2. Please attach any other relevant file(s)

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F. Declarations

F1. Please confirm that your organization does not receive, has not received and will not receive in the future, either directly or indirectly, any financial or other contributions or assistance from the tobacco industry or its affiliates. Please also confirm that neither your members nor your partners are affiliated directly or indirectly with the tobacco industry or its affiliates or those furthering the interests of the tobacco industry.

Yes, I confirm

F2. By electronic signature I confirm that the above information is accurate and completed to the best of our abilities.

Lilia Olefir

28/02/2025

F3. Please confirm that the activities of your organization are in conformity with the 17th and 18th preambular paragraphs and Article 5.3 of the WHO FCTC.

Yes, I confirm